Version 2.2

# Child Safe Anglican Education

## PROCEDURES:
Child Safe Operations

# Table of Contents


1 INTRODUCTION 5

2 CHILD SAFE ACTION PLANNING 7

3 CHILD SAFE COMMITTEE 13

4 PUBLIC COMMITMENT 17

5 CHILD SAFE ADVOCATES 19

6 ASSURANCE AND LEARNING 23

7 HUMAN RESOURCE MANAGEMENT 29

7A WORKFORCE ADMINISTRATION 31

7B WORKING WITH CHILDREN AUTHORITIES (BLUE CARDS) 37

7C INDUCTION AND TRAINING 43

8 RISK MANAGEMENT 47

CHILD SAFE RISK MANAGEMENT 48

PROCUREMENT OF A BUSINESS, OR HIRING OUT SCHOOL OR ECS FACILITIES 50

INTERNATIONAL STUDENTS (INCLUDING HOMESTAY) 52

BOARDING, BILLETING AND OTHER OVERNIGHT ACCOMODATION 54

9 GLOSSARY 57

10 PRACTICE RESOURCES 61

# 1 Introduction

# Introduction

These Procedures: Child Safe Operations (the procedures) are provided to enable Anglican schools, and education and care services (ECS) 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).

Key terms in these procedures can be found in Section 9, Glossary.

## Purpose

Consistent with the policy, the application of these procedures are focused on schools and ECS responsibilities as Child Safe Entities and Reporting Entities under the *Child Safe Organisations Act 2024*, and other mandated requirements associated with children's safety. This includes:

- Promoting children's safety, wellbeing and best interests
- Effectively preventing, detecting and responding to reasonable suspicions of harm as well as matters which may be reportable conduct
- Application of the Child Safe Standards and the Universal Principle within each relevant Child Safe Entity

## Outcomes

These procedures are intended for workers with operational management responsibilities in the school, ECS and any business or group under the authority of control of the respective school or ECS. The outcomes sought from applying these procedures are:

**PREVENTION OF HARM**

Promoting the safety, well-being, and best interests of children. This includes taking all reasonable steps to reduce the likelihood of a child being harmed, especially when under the care, supervision, control, or authority of the school or ECS.

**PREPAREDNESS TO RESPOND**

Taking all reasonable steps to prepare schools and ECS operations to effectively respond to concerns relevant to child harm and reportable conduct.

**PROVIDE ASSURANCE**

Implementing actions to provide assurance that responsibilities for preventing, preparing for, and responding to child harm and reportable conduct are being met.

**PRIORITISE LEARNING**

Committing to processes of continuous improvement, identifying and applying new learnings to enhance the ability to prevent, prepare for, and respond to child harm and reportable conduct.

## Implementation

Decisions and actions by schools and ECS will be informed by these procedures. When specific instructions aren't provided, schools and ECS are 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.

2

# Child Safe Action Planning

# Child Safe Action Plans

**Child Safe Action Plans are a cornerstone of Child Safe Anglican Education. As such each school, ECS and any other Child Safe Entity operated by the school or ECS must create and apply a Child Safe Action Plan.**

Each Child Safe Action Plan is supported by a Child Safe Committee (CSC) [1]. Together, these provide local direction and oversight for how each Child Safe Entity implements the 10 legislated Child Safe Standards, the Universal Principle and other mandated requirements related to children's safety.

Child Safe Entities are defined in Schedule 1 of the *Child Safe Organisations Act 2024*. In addition to education, and early childhood education and care services, the following Entities most commonly operated within schools are accommodation or residential services (including home stay and boarding), health services, services or activities provided primarily for children, commercial services for children, transport/transport related services for children, and religious bodies.

A Child Safe Action Plan may be for one, or a group of, Child Safe Entities (e.g. a school, an accommodation service and each ECS can either have a combined Plan or separate Plans). This is based on local operating environments, and is to be determined by the Principal, and for ECS the Nominated Supervisor, in consultation with the CSC.

For Child Safe Entities that are also Reporting Entities under the Reportable Conduct Scheme: from term 1 2027, the Child Safe Action Plan describes the systems the Head of Entity must have in place (refer to Section 4 of these procedures 'Systems in Place').

Every Child Safe Action plan has two complimenting parts:

1. **CHILD SAFE ACTION PLAN: OPERATIONS** (for publication)
2. **CHILD SAFE ACTION PLAN: IMPROVEMENTS** (for internal use)

To assist in the development and review of each Action Plan, the ASC provides:

1. **CHILD SAFE ANGLICAN EDUCATION POLICY**
2. **CHILD SAFE PROCEDURES (RESPONSES AND OPERATIONS)**
3. **COMPLIANCE SUPPORT INDEX**
4. **PRACTICE RESOURCES**

The Compliance Support Index includes mandated requirements specific to child safety within school and ECS operations. Revised versions will be published as needed.

[1] Within operations, the Child Safe Action Plan and Committee replace the previous requirement for a Child and Youth Risk Management Strategy and the associated Committee.

# Operations and Improvements

## Requirements

### 1. CHILD SAFE ACTION PLAN

**A**

The following persons are responsible for ensuring the Child Safe Action Plan is developed, implemented, reported on and reviewed:

- SCHOOLS: the Principal, supported by the Chair of the CSC
- ECS: both the Nominated Supervisor, and the Approved Provider or their delegate.

**B**

#### CHILD SAFE ACTION PLAN: OPERATIONS

The Operations Plan is a published document and describes what actions are currently being taken or scheduled to be taken to comply with each Standard and the Universal Principle.

In preparing the Operations Plan, Child Safe Entities are to:

- Include actions taken to comply with applicable mandatory requirements relevant to children's safety, including but may not be limited to those identified in the Compliance Support Index.
- Include actions taken to implement the Child Safe Standards, the Universal Principle and related child safety requirements within each Child Safe Entity's approach to risk assessment and management.

Consider additional content within the Compliance Support Index, noting:

- QFCC Key Action Areas are required to be considered in the context of the operating environment.
- Indicators and other relevant content are examples that may also be relevant to consider.
- The application of a risk management approach is provided for each Standard.

The Child Safe Anglican Education Policy and both Procedures: Child Safe Operations and Child Safe Responses, include content that is relevant to list as being implemented in the Action Plan (e.g. the Public Commitment, Child Safe Committee, Child Safe Advocates and the Response processes).

In addition, each school and ECS implements policies, procedures, systems and processes that will be relevant to list, as applicable to each Standard and the Universal Principle.

**C**

#### CHILD SAFE ACTION PLAN: IMPROVEMENTS

The Improvements Plan is for internal use only and recognises that continuous improvement is a fundamental, acceptable and necessary part of Child Safe Entities.

The Improvements Plan describes the actions planned to improve operations in relation to each Standard and the Universal Principle into the future. This is an important part of demonstrating Standard 9: Continuous Improvement.

# Requirements

## 2. ENDORSEMENT AND APPROVAL

### A SCHOOLS

- The Action Plan is endorsed by the School Council. Where the school does not have a Council, the Action Plan is endorsed by the school's Governing Body (Board).
- Action Plans are approved by the school's Principal each year before the end of Term 1.

### B EDUCATION & CARE SERVICES

- For co-located ECS the Action Plan is endorsed alongside the school's Plan (refer to process above).
- For other ECS the Action Plan is endorsed by the ECS Management Committee.
- For all ECS, Action Plans are approved by the ECS's Approved Provider or delegate, each year, before the end of term 1.

## 3. ASSURANCE AND CONTINUOUS IMPROVEMENT

Implementation of the Child Safe Action Plan is monitored throughout the year to support assurance, reporting and continuous improvement.

### A MONITORING AND REPORTING

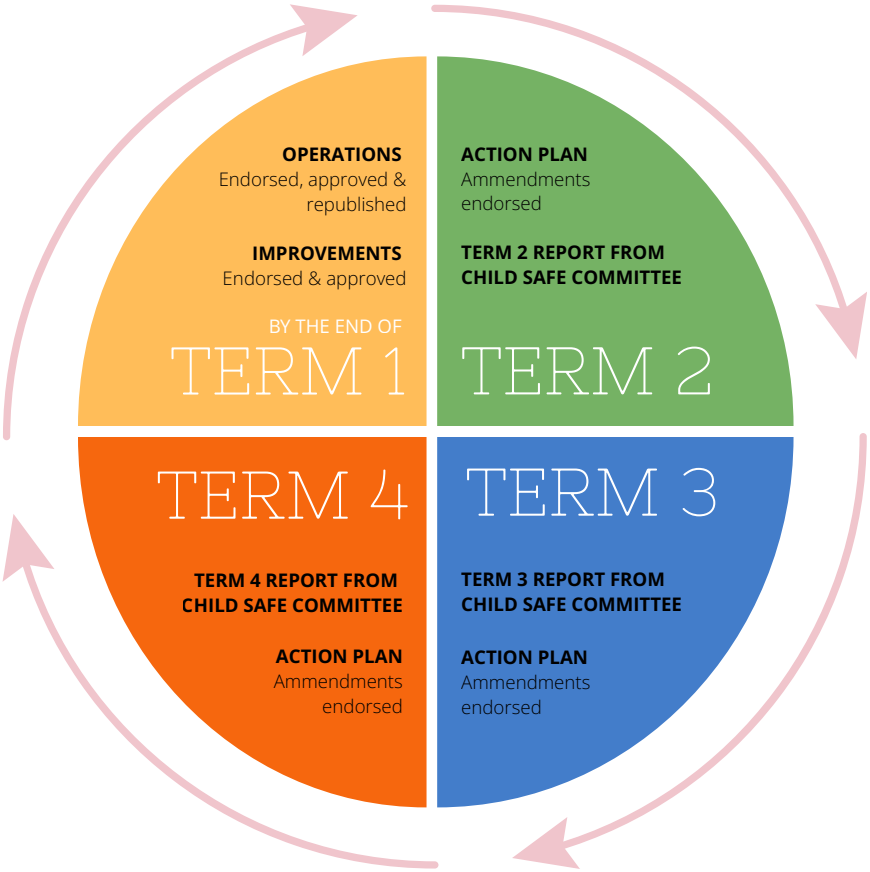
Implementation of the Action Plan is monitored by the CSC, with progress reported by the CSC at least once during Terms 2, 3 and 4 to the Nominated Supervisor (ECS), Principal (schools) and School Council/ECS Management Committee. Progress includes:

- Completion of actions
- Delay to approved timeframes for commencement or completion of actions
- Request to amend or delete actions
- Development of new actions

New actions can be added to the Action Plan (either or both the Operations or Improvement Plans), reflected in termly reports, endorsed through that reporting process, then formally incorporated into the Action Plan during the annual approval process in the following Term 1.

# Requirements

## 4. CHILD SAFE ACTION PLAN OVERVIEW: APPROVAL AND REPORTING




See Practice Resources

- Compliance Support Index
- Child Safe Action Plan: Operations template
- Child Safe Action Plan: Improvements Template
- Child Safe Action Plan: Monitoring Tool
- Child Safe Committee: Report Template

3

# Child Safe Committee (CSC)

# Child Safe Committee (CSC)

Child Safe Action Plans are supported by a Child Safe Committee (CSC)[1].

The CSC's purpose is to coordinate the development, implementation, reporting and review of all related Child Safe Action Plans. This includes:

- The implementation of the Child Safe Anglican Education Policy and related procedures within all operations
- The implementation of systems or practice improvements (e.g. updates to policies, changes to the environment, supervision or recruitment processes, or cultural safety practices)
- Evaluating whether changes have systematically reduced the risk to children.

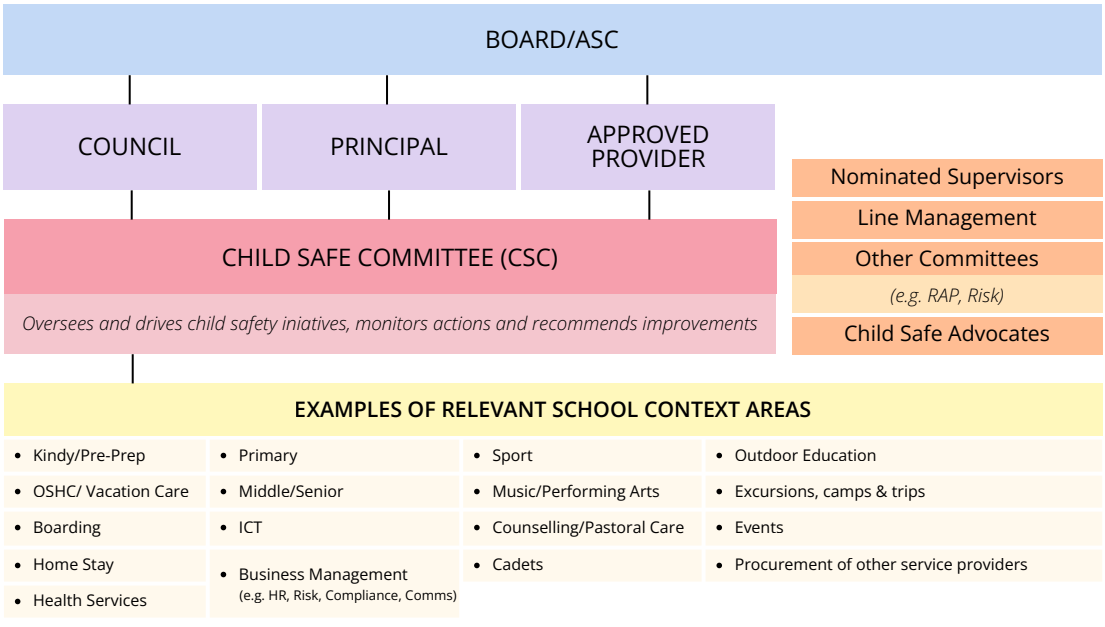
## Requirements

### 1. ADMINISTRATION

The information below describes the administration by which the CSC is established in each school and co-located ECS.

In other ECS, the CSC can either be a sub-committee of, or integrated into, the ECS's Management Committee. Where this occurs, the Nominated Supervisor, and the Approved Provider or their delegate, are responsible for ensuring the work of the CSC is consistent with the relevant administration matters below.

The following Figure 1 represents the governance structure that CSCs sit within schools and co-located ECS.




[1] Within operations, the Child Safe Action Plan and Committee replace the previous requirement for a Child and Youth Risk Management Strategy and the associated Committee.

# Requirements

## 2. MEMBERSHIP

The CSC is to have membership that represents each Child Safe Entity relevant to the Action Plan/s and each area within that Entity that provides services or activities impacting children.

**Reminder:** In addition to schools and ECS, examples of Entities include accommodation or residential services (including home stay and boarding), health services, services or activities provided primarily for children, commercial services for children, transport/transport related services for children and religious bodies.

Each Principal is responsible for making decisions about appropriate membership of their CSC based on the structure of the school. Consideration and decisions on membership will be reflected in the CSC's Terms of Reference.

Attendance of members at meetings is expected, with a proxy to attend by exception.

## 3. TERMS OF REFERENCE

Each CSC is to have a Terms of Reference, including a list of roles and membership, calendar and standard agenda approved by the Principal each year.

To support review and continuous improvement throughout the year, the following topic focus areas are recommended for consideration as a minimum, noting at times other topics may also be important to include to reflect local operations and opportunities for improvements:

- TERM 1: PEOPLE FOCUS
  Administration of CSC, confirmation of Action Plan (for approval), and Standards 5 and 7
- TERM 2: CHILD FOCUS
  Standards 2, 3 and 4
- TERM 3: OPERATIONS FOCUS
  Standards 8 and 10
- TERM 4: IMPROVEMENT FOCUS
  Standards 1, 6 and 9, and finalisation of Action Plan for following year

See Practice Resource: Child Safe Committee Terms of Reference Template

## 4. ROLES

**A** CHAIR

Recommended to be a member of executive or senior leadership to help embed connection between the CSC and school executive. The Chair is responsible for leading the CSC, including ensuring appropriate reporting on the progress of the Action Plan to the Nominated Supervisor (ECS), Principal (schools) and the School Council/ECS Management Committee, at least once per term.

**B** SECRETARIATE

Provides administrative support required for the CSC to operate effectively, including record keeping and administration tasks.

# Requirements

## 4. ROLES (CONTINUED)

### C LEAD CHILD SAFE ADVOCATE:

This role provides leadership support to the Principal and other Child Safe Advocates [1] in the administration and assurance of the Procedures: Child Safe Responses. This role is suggested to be a member of executive or senior leadership, who may or may not also be the Chair of the CSC. For further information on Child Safe Advocates, see Section 5 of these procedures.

[1] Previously referred to as Student Protection Officers.

### D SCHOOL COUNCIL MEMBER

A member of the school council is recommended to be to be a member of the CSC to support strong connection with school leadership.

### E RAP COMMITTEE CHAIR:

The RAP Committee Chair, or similar staff member with related focus, is recommended to be a member of the CSC. Given the importance of cultural safety and the requirement for the Universal Principle to be embedded in each of the Child Safe Standards[1] it is important to establish and maintain integrated connections between Child Safe and RAP governance and practices.

[1] When organisations implement the Child Safe Standards, they must also provide an environment that ensures the cultural safety of Aboriginal children and Torres Strait Islander children. This is known as the Universal Principle. It has the same importance as each of the Standards and the same enforcement powers can be used by the Queensland Family and Child Commission to address non-compliance.

### F GENERAL MEMBERS

Members may represent more than one relevant context area (see Figure 1 in Administration).

Members are expected to be able to facilitate the implementation of the Action Plan for that area and represent that area within discussions.

If a CSC includes an ECS, the Nominated Supervisor of that ECS is to be a member of the CSC.

Members are responsible for:

- Actively participating in work, meetings and reporting of the CSC
- Status reporting on, and completion of, any action they are allocated
- Reporting as per each meeting agenda and as relevant to the area/s they represent

### G INCLUSION OF CHILDREN, PARENTS AND OTHER STAKEHOLDERS, SUCH AS CRITICAL FRIENDS[1]

It is important that the work of the CSC is not impeded by concerns of perceived or actual confidentiality issues and other operational risks. This impediment can occur despite best intentions and organisational culture. Confidentiality at times may be important to ensure fulsome information sharing and consideration. For this reason, children, families and other stakeholders will not be included in the CSC membership.

However, the input of children, parents and other stakeholders is integral to enable meaningful engagement with these persons, in keeping with Standards 2 to 4. To support engagement, each Child Safe Action Plan will include strategies for effective participation of children, parents and other relevant stakeholders in regards to the application of Child Safe Standards and the Universal Principle.

[1] A Critical Friend is a trusted person, usually independent of the School or ECS who can provide specialist advice to inform the work of the Committee, for example, advice regarding cultural safety or online safety. Examples of potential Critical Friends include a local Elder, academic, a private service provider, a graduate from the school, or representative from a local community service provider.

4

# Public Commitment

# Public Commitment to Child Safety

Schools and ECS demonstrate their commitment to child safety through publicly available information, accessible communication and operational systems that support child safe practice. This includes publishing key child safe documents, providing information appropriate to stakeholders and maintaining systems that support the prevention, reporting and management of reportable conduct.

## Requirements

### 1. PUBLIC COMMITMENT AND PUBLICATION

The Child Safe Anglican Education Policy includes a Public Commitment to Child Safety. Each Child Safe Action Plan is to describe how this Commitment is embedded within operations.

The Child Safe Anglican Education Policy and associated procedures will be published by the ASC on its website.

Each Child Safe Action Plan is to describe how these, and other relevant documents, are made available to that Child Safe Entity's stakeholders, inclusive of appropriate information for children, families, workers and other community members.

This includes publication of the following documents in a manner that is accessible and easy to understand:

| PUBLISHED DOCUMENTS | CHILD FRIENDLY RESOURCES | COMMUNITY RESOURCES |
|---|---|---|
| | For example: | For example: |
| Child Safe Anglican Education Policy | Your Safety | Child Safety Induction Overview |
| Procedures: Child Safe Responses | Talk to a Grown Up/Adult | Example Induction Resources |
| Procedures: Child Safe Operations | Child Safe Advocates | Example Content for Parent Communication |
| Child Safe Action Plan (Operations Plan) | Child Safe Process | Content for Student Diary/Portal |
| | | Teaching Notes and Resources |

### 2. SYSTEMS IN PLACE

Schools and ECS, as well as accommodation or residential services, health services, religious bodies and services for children with a disability, are Child Safe Entities that are also Reporting Entities.

From 1 July 2026, each Reporting Entity must have systems in place to:

- Prevent the commission of reportable conduct by a worker in the course of performing work for the Entity
- Enable any person to notify the Head of the Entity of a reportable allegation or reportable conviction of a worker
- Enable any person to notify the Queensland Family and Child Commission of a reportable allegation or reportable conviction involving the Head of the Entity (including through the Delegated Reporting Officer)
- Investigate and respond to a reportable allegation or conviction relating to a worker (as described in the Procedures: Child Safe Responses)

These systems will be reflected within school or ECS operations from 1 July 2026 and within the published Child Safe Action Plan (Operations Plan) from the next approved version (Term 1, 2027).

Refer to the Procedures: Child Safe Responses for further information.

5

# Child Safe Advocates

# Child Safe Advocates

Child Safe Advocates[1] play a vital role in supporting schools and ECS to meet their responsibilities under the Procedures: Child Safe Responses. Their role is focused on support, assistance and facilitation of child safe responses within school and ECS operations. Each school and ECS publishes details of their respective Child Safe Advocates. Refer to each school or ECS' Annexure to the Procedures: Child Safe Responses 'Child Safe Advocates and other Appropriate Persons'.

See Practice Resource: Delegations Approval Template

## Requirements

### 1. EDUCATION AND CARE SERVICES (ECS)

Each Nominated Supervisor must be a Child Safe Advocate. Responsible Persons[2] can also be Child Safe Advocates on approval of the Approved Provider or their delegate.

### 2. SCHOOLS (INCLUSIVE OF CO-LOCATED ECS)

Every Child Safe Advocate's role includes, but is not limited to, each school's requirement to have at least two stated staff members for "the reporting by a student to a stated staff member of conduct, of another staff member that the student considers is inappropriate" - as required under Regulation 16 (2)(a) and 16 (3) of the *Education (Accreditation of Non-State Schools) Regulation 2017.*

#### LEAD CHILD SAFE ADVOCATE

This role provides leadership support to the Principal and other Child Safe Advocates in the administration of Procedures: Child Safe Responses and Procedures: Child Safe Operations (where delegated to undertake Internal Reviews).

Recommended to be a member of executive or senior leadership. A Lead Child Safe Advocate may also be the Chair of the Child Safe Committee.

# Requirements

## 3. ALL CHILD SAFE ADVOCATES

### A INDUCTION

With the exception of Nominated Supervisors, before commencing the role, Child Safe Advocates must participate in an induction delivered by the Child Safety Program, ASC. Nominated Supervisors will participate in the first available induction following their commencement. All Child Safe Advocates will also attend an induction at least every 3 years as a skills refresher. Refer to Section 7C of these procedures, Induction and Training.

### B RESPONSIBILITIES

Child Safe Advocates are responsible for supporting the application of the Procedures: Child Safe Responses within school and ECS operations. This role is focused on support, assistance and facilitation and does not replace the decision-making responsibilities of other persons. Schools are to allocate Child Safe Advocate responsibilities across their Child Safe Advocate team in a manner that best suits their operational arrangements

**SUPPORT FOR CHILDREN**
A contact person and support for children when they are concerned for their own, or another child's safety or wellbeing, or are reporting the conduct of any person in the school or ECS that the child considers as inappropriate conduct, abuse or neglect.[3]

**SUPPORT FOR FAMILIES AND COMMUNITY MEMBERS**
A contact person and support for families, workers, visitors and community members when they have concerns for a child's safety or wellbeing, or the conduct of any person in an Anglican school or ECS that may be considered inappropriate conduct, child abuse or neglect[3].

**INFORMATION GATHERING**
Facilitate the gathering of information that will assist in the response to concerns, such as assessing whether the matter meets the threshold for applying the procedures, and what that response involves. Noting, if the matter impacts the safe operations of a school or ECS, the matter is first escalated to the Principal in schools, Nominated Supervisor in ECS, or other Appropriate Person, for oversight, as described in the Procedures: Child Safe Responses.

**CONSULTATION WITH ASC**
Whenever identified as being of assistance, consult with staff of the Child Safety Program, ASC, regarding the application of the procedures in practice.

**SUPPORTING RESPONSIBLE PERSONS**
Assist the Principal (schools), Nominated Supervisors and the Approved Provider (ECS), and the Delegate of the Governing Body (both) in meeting their responsibilities, as outlined in the Procedures: Child Safe Responses.

[1] Formerly Student Protection Officers
[2] As per the Education and Care Service National Law, a Responsible Person is, in addition to the Approved Provider and a Nominated Supervisor, a person in day-to-day charge of the service (s162).
[3] It is recommended this responsibility is allocated to all Child Safe Advocates. To comply with regulatory requirements, at least two school staff must have this responsibility.

6

# Assurance and Learning

# Child Safe Assurance and Learning

The following actions support the assurance and learning outcomes detailed within the Child Safe Anglican Education Policy. These activities support continuous improvement, oversight and accountability and are undertaken in addition to:

- Actions taken as part of a Child Safe Response (see Procedures: Child Safe Responses)
- Child Safe Action Planning
- Internal audits of Working with Children Registers

## Requirements

### 1. NOTIFICATION OF COMPLIANCE

By the end of Term 1 each year, the person responsible for approving the Child Safe Action Plan (Schools: Principal; ECS: Approved Provider or delegate) is required to provide written advice to the Chair of the Governing Body confirming:

- The Child Safe Action Plan has been approved for that year
- The Child Safe Action Plan: Operations includes actions that reflect compliance with all mandatory requirements identified in the Compliance Support Index
- These requirements have been met for the preceding twelve months, or since the requirement came into effect, whichever is later
- Where a requirement has not been met, the actions taken to rectify the issue

Note: Where the governing body is ACSQ, advice will be provided through the ASC, via the Executive Director/Director of Child Safety.

### 2. INTERNAL REVIEW OF CHILD SAFE RESPONSES

These reviews are undertaken in addition to the management, monitoring and reporting requirements outlined within the Procedures: Child Safe Responses. Each Appropriate Person responsible for managing a concern and completing a Child Safe Response Form is responsible for providing the Form and associated records for inclusion within the review process. The Lead Child Safe Advocate, or an alternative delegate of the Principal (schools) or Approved Provider (ECS), will undertake reviews of Child Safe Responses as described below.

See Practice Resource: Delegations Approval Template

All reviews will consider and report on Compliance with the Child Safe Anglican Education Policy and Procedures: Child Safe Responses and identify:

- Urgent matters requiring action
- Issues or themes identified through root cause analysis
- What worked well
- Challenges encountered
- Opportunities for improvement
- Recommendations for implementation of learnings or other actions as necessary

Where relevant, recommendations will focus on:

- Addressing urgent matters
- Improving future responses
- Training and capability development
- Reporting pathways
- Environmental design
- Cultural safety initiatives
- Supervision practices

The form and content of the report may vary depending on the type of issues identified.

# Requirements

## 2. INTERNAL REVIEW OF CHILD SAFE RESPONSES (CONTINUED)

See Practice Resources

- Child Safe Delegations Approval Template
- Child Safe Internal Review Checklist Template
- Child Safe Internal Review Register Template
- Child Safe Internal Review Report Template

**A**

### INTERNAL REVIEW OF RESPONSES RELATED TO SCHOOL OR ECS OPERATIONS

This review applies to Child Safe Responses impacting on the safe operations of the school or ECS.

#### TIMING

A review of each response will commence within a reasonable timeframe and be completed in a timely manner. Where operationally practicable, commencement is aimed to occur within one month of the matter being finalised.

**B**

### INTERNAL BI-ANNUAL REVIEW OF ALL RESPONSES

#### TIMING

A review of all Child Safe Responses managed by the school or ECS will occur and be reported on twice each calendar year. Report 1 is to be completed by the end of May and Report 2 by the end of October. Child Safe Responses completed from October may be carried forward to the following year's Report 1.

**C**

### FOR BOTH A AND B

#### URGENT MATTERS IDENTIFIED

Any urgent matters identified during these reviews are to be reported to the Principal (schools), the Approved Provider or their delegate (ECS) and Delegate of the Governing Body (both). An urgent matter is where the school/ECS response is assessed as not:

- Having taken all reasonable steps to protect a child from harm when in the school/ECS care, control, supervision or authority, or
- Meeting a mandatory requirement (see Compliance Support Index, Standard 6).

#### NON-URGENT FINDINGS AND RECOMMENDATIONS

Non-urgent findings and recommendations are to be reported on a biannual basis to the Principal and School Council (schools and co-located ECS), ECS Management Committee (other ECS), the Approved Provider or their delegate (all ECS), and the Delegate of the Governing Body. The report will also include information on the number of concerns raised and the number of matters reported to each statutory authority.

# Requirements

### 3. GOOD PRACTICE REPORT

Each year, aimed to be between March and July, the Director of Child Safety ASC, will consider each school and ECS Child Safe Action Plan for the purpose of providing a Good Practice Report identifying areas of good practice or innovation that other Queensland Anglican schools or ECS can consider for their own operations.

This Report will be shared with each Principal, the Approved Provider or their delegate, along with the ASC and, where relevant, within the ACSQ.

### 4. ASSURANCE AND LEARNING REVIEW

A Principal, the Approved Provider or their delegate, or Chair of the Governing Body, can trigger an Assurance and Learning Review, whenever identified as beneficial to improving the effectiveness of a school or ECS operations. Possible triggers, include, but are not limited to, a complaint outcome, critical incident or a regulatory issue.

The person who triggers the Review will also approve the scope of the Review, who is to conduct the Review and who the Review Report is intended to be provided to.

A

**REVIEW FOCUS**

In undertaking the Review, it is recommended the reviewer focus on the following outcomes, with consideration given to the Child Safety Anglican Education Policy and related Procedures:

**ASSURANCE THAT RESPONSIBILITIES ARE MET**

Actions focused on providing assurance that responsibilities to prevent, prepare for and respond to child harm are being met.

**IMPROVED EFFECTIVENESS THROUGH LEARNING**

Actions focused on identifying learning to improve how schools and ECS prevent, prepare for and respond to child harm.

**IDENITFYING**

- Urgent matters requiring action
- Issues or themes through root cause analysis
- What worked well
- What were the challenges
- What could be done differently to improve future operations
- Recommendations for how learnings will be implemented within school/ECS operations, or other actions as relevant.

**PROVIDE A REVIEW REPORT**

# Requirements

## 5. ASSURANCE AND LEARNING AUDIT

Commencing 2027, the Executive Director ASC, with the support of the Director of Child Safety, will arrange for schools and ECS to participate in Assurance and Learning Audits.

The Director of Child Safety will develop an Audit Methodology for the Executive Director's approval. The approved Methodology is aimed to be shared with respective schools and ECS, at least six months prior to Audit commencement. The Audits will be undertaken by an appropriately qualified person as approved by the Executive Director.

A

### AUDIT FOCUS

Audits will be focused on the following outcomes, with consideration given to the Child Safe Anglican Education Policy and related procedures:

**ASSURANCE THAT RESPONSIBILITIES ARE MET**

Actions focused on providing assurance that responsibilities to prevent, prepare for and respond to child harm are being met.

**IMPROVED EFFECTIVENESS THROUGH LEARNING**

Actions focused on identifying learning to improve how schools and ECS prevent, prepare for and respond to child harm.

Audit Reports will be provided, by the Executive Director, to the school or ECS Governing Body, along with, as relevant, the Principal, the Approved Provider or their delegate, School Council and ECS Management Committee. Where the Governing Body is ACSQ, this will occur via the ASC.

B

### AUDIT SCHEDULE

Each initial audit is intended to occur within five years from commencement of the Child Safe Anglican Education Policy.

**SCHOOLS**

For schools, this is aimed to align with the year preceding Cyclical Review through the Non-State Schools Accreditation Board.

- Where this cannot be achieved as the Cyclical Review is scheduled for 2027, transitional planning will occur with the respective school.
- Audits can be requested to be undertaken earlier by the Principal, School Council or the Governing Body (inclusive of the ASC for owned schools).

**EDUCATION AND CARE SERVICES**

For Education and Care Services, this will occur:

- For co-located ECS, aligned with their school's scheduled audit.
- For all ECS, audits can be requested to be undertaken earlier by the ECS Management Committee, Approved Provider or Governing Body.

7

# Human Resource Management

7A

# HR Management: Workforce Administration

# Workforce Administration

Workers play a critical role in creating and maintaining child safe environments. Effective workforce planning, recruitment and management processes support the selection, engagement and ongoing oversight of people whose values, attitudes and conduct align with a strong commitment to children's physical, emotional, psychological and cultural safety and wellbeing.

## Requirements

### 1. ROLE DOCUMENTATION AND MANAGEMENT

This section applies to all 'workers', an inclusive term for any individual performing work of any kind within, or on behalf of, an Anglican school or ECS, including, for example, employees, volunteers, contractors, subcontractors, consultants, labour-hire workers, trainees, work experience employees and religious leaders.

This definition is consistent with the *Child Safe Organisations Act 2024*.

A

#### REQUIRED ROLE DOCUMENTATION

Each school or ECS must develop and maintain a role description or similar document for every role type. This document is to include:

**ROLE REQUIREMENTS**

Relevant information and requirements (e.g. screening, registration, qualifications).

**RESPONSIBILITIES TO CHILDREN**

A clear outline of the role's duties and responsibilities related to child safety.

**MANAGEMENT OVERSIGHT**

Details of the position(s) responsible for the management and oversight of the role.

B

#### ACTIVE MANAGEMENT OF WORKERS

Every role, whether paid or unpaid, must be actively managed. This management is to be delegated to an appropriate line manager who is responsible for the oversight of the role, including recruitment, induction, training and performance management.

C

#### MANAGING OTHER INDIVIDUALS

For individuals not directly engaged as workers (e.g. external service providers, residents on school grounds, visitors) alternative risk management assessments and controls must be in place.

Entry points without robust assurance processes are considered high risk due to reduced oversight.

See Section 8 of these Procedures

# Requirements

## 2. RECRUITMENT AND SCREENING

Child safe recruitment, including advertising, referee checks and screening, is central to ensuring the safety and wellbeing of children.

### A RECRUITMENT PRINCIPLES

When recruiting, consider the following:

**ASSESS VALUES AND ATTITUDES**

Use recruitment and selection processes to evaluate whether an applicant's values, motives and attitudes align with a culture that sees children's safety as paramount.

**EVALUATE PROFESSIONALISM**

Reinforce and evaluate the applicant's understanding of professional boundaries, as this is essential for protecting children.

**CONDUCT THOROUGH REVIEWS**

Be thorough and critical when reviewing all application information. Be vigilant for red flags that may impact a child's safety or wellbeing, e.g. habitual rule breaking.

### B VACANCY MANAGEMENT

**ADVERTISEMENTS AND ROLE DESCRIPTIONS**

Include clear statements about the school or ECS commitment to children's physical, emotional, psychological and cultural safety and wellbeing in all job advertisements. Role descriptions should also reflect this commitment and outline relevant child safety expectations specific to the position.

**CODE OF CONDUCT**

Provide all applicants with applicable conduct expectations (e.g. Code of Conduct) as part of the information package. Require applicants to read and confirm their agreement to these expectations in writing, with this confirmation documented as part of the application process.

**SELECTION CRITERIA**

Include a selection criterion such as:
"Must be able to demonstrate an understanding of appropriate professional boundaries and standards when working with children and young people."

### C CONDUCT EXPECTATIONS

During the assessment of a person's suitability for a role, explore their understanding and commitment to conduct expectations, especially regarding interactions with, or about, children. Apply the following areas as relevant:

**MOTIVATION**

The applicant's motivation for working in a school or ECS.

**CHILD DEVELOPMENT**

Their understanding of children's development and needs.

**VALUES AND ATTITUDES**

Their values and attitudes towards children, including their perspective on children's rights and how to uphold them.

**PROFESSIONAL BOUNDARIES**

Their understanding and commitment to maintaining appropriate professional boundaries.

**EMPLOYMENT HISTORY**

Their reasons for leaving current or previous jobs.

# Requirements

## 2. RECRUITMENT AND SCREENING (CONTINUED)

D

### APPLICANT DISCLOSURE REQUIREMENTS

Prior to accepting a position, applicants must be asked to disclose if they:

- Have been charged with an offence against a child (including charges not proceeded with, or where a caution was provided).
- Have had a prohibited status under applicable working with children screening legislation lifted (in Queensland or other jurisdictions).
- Have been the subject of any complaint, disciplinary, or investigatory processes involving child abuse or neglect, including reportable conduct.

If at any time during the recruitment process information is received that any of the above apply, consultation with relevant people, including delegates of the Approved Provider and Governing Body, must occur.

No applicant may be appointed if doing so would knowingly increase the risk of harm to any child.

## 3. REFEREE CHECKS

When considering an applicant, assess their ability to provide appropriate referee options. The following must be considered:

- References are preferred from positions where the applicant has worked with children, especially within the last five years. Ask applicants to nominate senior referees who were in a line management position for each place of employment. If such a referee is unavailable, the applicant must provide a reasonable explanation. Where at all possible this explanation is independently verified by the school or ECS.
- For workers in roles with significant contact with children (e.g. unsupervised contact, personal care or homestay hosting), conduct a minimum of two referee checks. Critically assess the suitability of each nominated referee.
- Confirm the identity of each referee to ensure the reliability of the reference check.

Referee checks are a critical part of the suitability assessment. To ensure a consistent process, schools and ECS are advised to adopt a standardised set of questions for all referees. All checks must clearly establish the referee's relationship with the applicant, including how long they have known each other and the specifics of their professional or personal connection.

The check should then seek information about the following:

WORK WITH CHILDREN

The referee's knowledge of the applicant's work or interactions with children and families, including any specific observations or feedback.

SUITABILITY AND CONDUCT

Their opinion on the applicant's suitability for the position, including any concerns about the applicant's attitudes or conduct regarding children's physical, emotional, psychological and cultural safety and wellbeing.

CONCERNS

Whether they have any concerns about the applicant working with children or within a Child Safe Entity.

# Requirements

## 4. SCREENING

Screening can only detect a subset of unsuitable individuals. Outcomes of screening are not confirmation that a person is 'safe'. The following steps are to be taken:

**CREDENTIAL VERIFICATION**

Prior to appointment, verify the applicant's identity, qualifications, professional registration and other relevant screening requirements.

**WWCA COMPLIANCE**

Ensure all individuals requiring a Working with Children Authority (Blue Card) have a current authority linked to the school or ECS prior to commencing work.

**ADDITIONAL CHECKS**

Consider the need for a National Police Clearance or international criminal history check, or Anglican Church National Register Check (for Clergy and Licensed Persons).

**DO NOT ENGAGE A PERSON UNTIL ALL RELEVANT SCREENING HAS BEEN COMPLETED.**

**See Practice Resource: Advice on Screening Requirements in Schools and ECS** for specific screening requirements by role type.

A

### VERIFICATION AND VALIDATION REQUIREMENTS

**IDENTITY VERIFICATION**

The school or ECS must take reasonable steps to verify the person's identity. This includes ensuring their identity documents are consistent with their Blue Card and must occur prior to notifying BCS or another regulatory body about a person's employment.

**WORKING WITH CHILDREN AUTHORITY (BLUE CARDS)**

Before a person who requires a Working with Children Authority commences, the school or ECS must confirm the validity of their Blue Card and link them to the school or ECS Blue Card Services (BCS) Online Organisational Portal. This applies to all workers directly engaged by the school or ECS, including trainee students and pre-service teachers. The purpose of linking is to ensure the school or ECS receives direct notification from BCS of any changes to the person's eligibility status.

**VERIFICATION OF PROFESSIONAL REGISTRATIONS**

For workers who are regulated through a professional body (e.g. the Queensland College of Teachers or the Australian Health Practitioner Regulation Agency), their registration must be confirmed prior to commencement. Where possible, their registration is to be linked to the school or ECS as the employer. Where a link is not possible, their registration must be confirmed on at least an annual basis.

The requirement for workers to maintain a Working with Children Authority (Blue Card) or a professional registration must be clearly stipulated in their employment contract or agreement.

## 5. WORKERS (INCLUDING VOLUNTEERS) WHO DO NOT REQUIRE A WORKING WITH CHILDREN AUTHORITY

Workers (including volunteers) in schools or ECS must be eligible to hold a Working with Children Authority (Blue Card), even if they are exempt from requiring one (e.g. some parent volunteers and volunteers under 18).

In these circumstances, the school or ECS must have workers acknowledge in writing that they are not a Restricted Person. This means they do not currently have a suspended Working with Children Authority or hold a Negative Notice, are not a disqualified person as defined in the *Working with Children Check Act 2000*, and are not currently charged with or have been convicted of a serious or disqualifying offence as defined in the *Working with Children Check Act 2000*.

## Requirements

### 6. PROBATION

Schools and ECS are recommended to apply the maximum allowable probation periods to all positions. This period should be used as a proactive and thorough assessment of the employee's suitability.

During this phase, it is recommended that the line manager use direct observation and feedback from others (including children and relevant stakeholders) to assess the employee's strengths and weaknesses in their work with children. The probation period is to be used as an opportunity to identify and address issues promptly, preventing them from escalating.

7B

# HR Management:
# Working with Children Authorities (Blue Cards)

# Working with Children Authorities

Working with Children Authorities (Blue Card, including Exemption Cards) are a critical safeguard that support the safe engagement of workers within schools and Education and Care Services (ECS). Schools and ECS must have systems in place to ensure authorities are verified, monitored and managed in accordance with legislative requirements.

## Requirements

### 1. ACCOUNTABLE PERSON

The Principal (schools) or the Nominated Supervisor (ECS) must delegate one person to serve as an Accountable Person for overseeing all internal processes related to Working with Children Authorities (Blue Cards, including Exemption Cards) and the associated Register. Consideration should also be given to business continuity should this person be unavailable.

See Practice Resource: Child Safe Delegations: Approval template

With reference to the requirements described below, key responsibilities of this role are to:

**DOCUMENT AND APPLY PROCEDURES**

Create and apply local work instructions/procedures

**MANAGE BLUE CARDS AND REGISTERS:**

Fulfill the school or ECS responsibilities regarding Blue Cards and maintain a complete and accurate Register. This includes:

- Appointing appropriate staff as 'administrators' for the BCS Online Organisational Portal and the school/ECS Register.
- Maintaining the currency of the Contact Person on the BCS Online Organisational Portal.

**OVERSEE AUDITS**

Ensure that all required audits are undertaken (see 8 below).

### 2. NOMINATED REPRESENTATIVE/CONTACT PERSON FOR BLUE CARD SERVICES (BCS)

Under Queensland law, each school and ECS must have a Nominated Representative with Blue Card Services (BCS). This person is referred to as the Contact Person. The Contact Person is the employing authority (e.g. the school Principal).

**COMMUNICATION WITH BCS**

The Contact Person is the only individual who will receive official correspondence from BCS regarding Blue or Exemption Card applications, including notifications and outcomes. Anyone listed as an 'administrator' on the BCS Online Organisational Portal is a 'telephone contact', a person who can call BCS on behalf of the Contact Person but will not receive written correspondence.

**UPDATING CONTACT DETAILS**

BCS requires the contact details of the Contact Person to be maintained. Updating this information can be done online (via a form or through the BCS Online Organisational Portal) or by submitting a paper form.

## Requirements

### 3. REGISTER

All persons engaged as part of school or ECS operations must be recorded on a Register. The Register must include, at a minimum, the following details for each person:

- Engagement dates (commencement and cessation).
- Whether a Working with Children Authority (Blue Card, including Exemption Card) is required, and if so, the details of that Blue Card, including the expiry date.
- Where a Blue Card is not required, the reason for this exemption.
- Confirmation that the person is not considered to be a Restricted Person during engagement.

Once a person is entered onto the Register, their entry must not be deleted, even if their engagement ceases. The Register can also be used to record additional information, such as contact details, completion of induction/training, acknowledgment of the Code of Conduct, and/or reason for cessation.

### 4. MAINTAINING BLUE CARDS: RENEWALS

If a cardholder fails to renew their Blue Card before it expires, they are subject to the "No Card, No Link, No Start" rule and are unable to continue in their role. Furthermore, if a person remains engaged after their Blue Card has expired and no renewal application was made prior to expiry, the school or ECS may be committing an offence.

A

**RENEWALS PROCESS**

BLUE CARD SERVICES (BCS)

- Applicants can apply to renew their Blue Card up to 16 weeks before its expiry date.
- Cardholders must keep their personal contact details up to date with BCS. This can be completed online.
- BCS will send cardholders a reminder text to renew their card before it expires.

INTERNAL SCHOOL/ECS ALERT SYSTEM

- The Register must clearly identify the expiry date of each Blue Card.
- The Register and local processes should support an internal alert system that provides a warning at least 12 weeks prior to an expiry date.
- It is preferable that this alert system is automated and notifies both the cardholder and the relevant staff responsible for the Register.
- Local processes must outline the actions taken to ensure the Blue Card is renewed prior to the expiry date.

MANAGING VOLUNTEERS TURNING 18

- The date of birth of volunteers nearing their 18th birthday (such as residents in a homestay) can be recorded on the Register as an 'expiry date' and used to trigger an alert, notifying that a Blue Card is required prior to their birthday.

## Requirements

### 5. LEAVING AN ORGANISATION

When an employee or volunteer leaves the school or ECS, Blue Card Services (BCS) must be notified as soon as practicable. This is done by de-linking the cardholder via the BCS Online Organisational Portal or by submitting a de-link form.

Concurrently, the Working with Children Register must be updated to reflect that:

- The person is no longer with the school or ECS.
- The person is no longer linked with the school or ECS on the BCS portal.
- The person's Blue Card status has been updated to 'inactive'.

This process is critical for meeting legislated privacy obligations.

### 6. CHANGE IN POLICE INFORMATION OR ADVERSE FINDINGS FROM THE REPORTABLE CONDUCT SCHEME

A person with a Blue Card is not legally obligated to advise their employer of any change to their police information. Instead, all applicants and cardholders are obligated to inform Blue Card Services (BCS) directly of any changes to their police information. This is done by completing a change in police information notification on the BCS website.

When BCS receives information on changes to a person's police history (either from the Queensland Police or the individual themselves) or adverse findings from a Reportable Conduct Scheme Investigation (from the Queensland Family and Child Commission (QFCC)), BCS will determine if this changes the applicant's eligibility to work with children (e.g. through suspension or cancellation of their Blue Card).

BCS is only notified of changes to Queensland police history by Police. Interstate history is only checked during the initial application and renewal processes. BCS is also notified of adverse findings from Queensland's Reportable Conduct Scheme Investigations by the QFCC

Regardless of their Blue Card obligations, all workers are required to disclose any information that may indicate a perceived, potential, or actual child safety 'concern' under the Child Safe Anglican Education Policy. This includes information about their own conduct that may impact their Blue Card or their status as a non-restricted person. For guidance on how to respond to such a disclosure, refer to the Procedures: Child Safe Responses.

### 7. CANCELLATION, SUSPENSION, OR NEGATIVE NOTICE

When a Blue Card is correctly linked to the school or ECS, Blue Card Services (BCS) will notify the school's or ECS's Contact Person of any suspension or cancellation.

Upon receiving such a notification, the school or ECS must:

**IMMEDIATELY REMOVE THE PERSON**

A person with a suspended Blue Card or a Negative Notice cannot continue in regulated employment. The school must immediately remove the person from such a role.

**PROHIBIT RETURN**

The person must not return to regulated employment until the suspension or negative notice is revoked, and the school or ECS is satisfied that the person does not present an unacceptable risk of harm to children.

**UPDATE THE REGISTER**

The school or ECS Register must be updated to note the BCS notification and the actions taken to protect children.

# Requirements

## 8. AUDITS

The Accountable Person must facilitate and undertake internal audits at least three times each year to ensure the integrity of the Working with Children Authority and Register processes within the school or ECS. This is aligned with reporting by the Child Safe Committee.

The outcomes of these audits are to be reported as follows:

**BREACH OF LAW**

If a breach of law is identified, it must be reported immediately to the Principal (schools) or the Approved Provider or their delegate (ECS). The Principal or Approved Provider must, in turn, ensure the Delegate of the Governing Body is notified.

**REGULAR REPORTING**

Audit outcomes are to be included in the Child Safe Committee Report submitted to the Principal and School Council, or Nominated Supervisor and ECS Management Committee, in Terms 2, 3, and 4.

During each audit, the following key matters must be checked:

**REGISTER ACCURACY**

Verify that all relevant information is recorded in the Register and that it matches the Blue Card Services Online Organisational Portal (e.g. that individuals remain linked). Ensure all newly engaged people have been added to the Register since the last audit.

**EXPIRY DATES**

Confirm that all Blue Card expiry dates are in the future.

**PROACTIVE ALERTS**

Identify all alerts for potential non-compliance, such as Cards due to expire or a volunteer/homestay household member who is due to turn 18.

**RENEWAL ACTION**

For any Blue Card with an alert dated before the next scheduled Audit, confirm that appropriate action has been taken or is planned to support the person in applying for their renewal or initial Blue Card.

Schools and ECS are to cross-reference the Register with other localised systems (such as payment, sign-in, and information databases) to ensure all relevant persons are recorded correctly. In addition to staff on payroll, careful consideration must be given to the following groups:

**VOLUNTEERS**

Including the identification of parent volunteers who may require a Blue Card.

**SUPPORT ROLES**

E.g. sports coaches and music tutors.

**HOMESTAY**

Hosts and residents.

**REGULATED BUSINESSES**

Especially sole operators/contractors engaged by the school or ECS.

7C

# HR Management: Induction and Training

# Induction and Training

## Requirements

### 1. INDUCTION AND TRAINING

Each school and ECS is to be able to evidence the provision of this material to relevant persons.

A

**VISITORS AND WORKERS**

ONBOARDING

Are provided with information that outlines their responsibilities relevant to the Child Safe Anglican Education Policy. The nature of this information is to be determined by the School or ECS, and may vary as relevant to the purpose of the person's role and responsibilities. Generally, the onboarding material:

- Is provided prior to the person commencing their intended role.
- Can occur through either verbal presentation or through written material (including, for example, information provided and agreed to when 'signing in' to the School or ECS). Verbal presentations are to be documented (e.g. file note).
- Occur on at least an annual basis.

B

**WORKERS (IN ADDITION TO ABOVE)**

Are equipped, through ongoing education and training as relevant to their role, with the knowledge, skills and awareness to help children have their safety needs met. For volunteers and short term/seasonal and new workers, this information will be made available through onboarding induction. Staff in continuous service also complete annual training (discussed below).

Schools and ECS will provide information (including training materials) to support workers to understand matters related to the school or ECS Child Safe Action Plan, and the role they have in helping to manage risks to children's safety.

Without limiting what training may be required, training may include:

- Helping to create environments that reduce the opportunity for abuse or harm to occur, and embed strategies aimed at preventing harm and enhancing wellbeing
- Being attuned to signs of harm and abuse and helping identify risks of harm and abuse to children, including harm caused by other children
- Helping facilitate child-friendly ways for children to express their views, participate in decision making and raise their concerns
- Helping handle disclosures or suspicions of harm and abuse to children
- Supporting colleagues who disclose or raise concerns of harm or abuse
- Understanding the existence and application of applicable law and any obligations that they may have under that law, and
- Effectively implementing the organisation's relevant policies and related processes and any obligations they may have under these policies and processes.

C

**STAFF (IN CONTINUOUS SERVICE), AND MEMBERS OF A SCHOOL COUNCIL, OR ECS (IN ADDITION TO ABOVE)**

Are trained annually in child safe processes:

- Using training material provided by the ASC each year on child safe processes, and
- Additional, often localised, content provided by the School or ECS.

# Requirements

## 1. INDUCTION AND TRAINING (CONTINUED)

D

### CHILD SAFETY ADVOCATES, INCLUDING NOMINATED SUPERVISORS (IN ADDITION TO ABOVE)

- Before commencing the role, Child Safe Advocates must attend an induction delivered by the Child Safety Program, ASC; with the exception of Nominated Supervisors who will attend the first available induction following their commencement.
- Attend inductions at least every 3 years thereafter as a skill refresher.
- Participate in annual professional development as arranged by the ASC.

See Practice Resources: Induction Overview and Example Induction Resources

8

# Risk Management

# Child Safe Risk Management

Risk management, focused on preventing, identifying, eliminating and mitigating risks to children's physical, emotional, psychological and cultural safety and wellbeing, is an integral part of being a child safe organisation.

Effective management of risk supports the safety and wellbeing of children, while creating worthwhile opportunities.

Each school or ECS has a positive duty towards the safety of children and to protect them from risks arising from the organisation's operations. This includes the need to:

- Identify reasonably hazards
- Eliminate these hazards so far as reasonably practicable, and
- Where they cannot be eliminated, minimise risks as far as reasonably practicable through the implementation, maintenance and review of effective control measures.

Risk management is a proactive process that enables a school or ECS to identify risks and reduce the likelihood or severity of adverse circumstances.

At a high level, the three risks seeking to be managed are:

- Children will be harmed or placed at risk of harm from abuse (physical, sexual, emotional, psychological) or neglect (lack of appropriate care) by an adult, or from the conduct of other children.
- Children's need for physical, emotional, psychological and cultural safety will not be met.
- Concerns of child harm will not be effectively responded to.

As such, each school and ECS are required to reflect the management of these risks within their risk management processes, which are broader, yet inclusive of child safety.

## Requirements

### 1. ASSESSING RISKS

Children are often exposed to a variety of environments, activities and people related to their attendance or enrolment at a school or ECS. Schools and ECS are responsible for assessing these circumstances to identify risks and plan accordingly. As part of each school and ECS risk management process, all activities undertaken by or within the School or ECS require risk assessment.

Key questions to consider when assessing risk for any context:

- Does this create any reasonably foreseeable hazards to the safety of children? Consider the environment, activities and people children could be exposed to.
- Are there effective controls in place to adequately eliminate or reduce these hazards and related risks?
- Do the people who need to implement these controls understand their responsibilities, and have the capability to do so?
- Have staff with appropriate authority approved these arrangements, with specialist advice sought where needed?
- Are risk assessments and plans (including controls) recorded in a way that enables the school or ECS to evidence that all action that could be reasonably expected has been taken to protect children from harm?
- Are effective quality assurance strategies in place to be confident this is happening?

## Requirements

### 1. ASSESSING RISKS (CONTINUED)

In addition to the above, the following content informs relevant risk assessments and the operation of these activities:

- Procurement of a Business, or Hiring out use of School or ECS Facilities
- International Students, including Home Stay
- Boarding, Billeting and other Overnight Accommodation (including camps)

# Procurement of a Business, or Hiring of School or ECS

When a school or ECS engages an external business to provide services to children or allows a business to use its facilities, a risk assessment is to inform the approval process.

These arrangements can create increased risk. While the school or ECS remains responsible for children's safety, its knowledge and control over the activity may be decreased. To mitigate this risk and foster a child safe culture, the school or ECS must be satisfied that the business is assessing and controlling hazards effectively.

## Requirements

### 1. ENGAGEMENT AND OVERSIGHT OF EXTERNAL BUSINESSES

A

**PROCUREMENT AND APPROVAL REQUIREMENTS**

Key considerations:

At the procurement stage, assess the level of risk to children. Ensure that a comprehensive risk assessment is documented and actively implemented.

Determine if the engagement is a contractor or sub-contractor relationship. Under the *Child Safe Organisations Act 2024*, a 'worker' of a Child Safe Entity includes a contractor or subcontractor. If a contractor or sub-contractor relationship exists, the school or ECS may manage this person or role similar to a staff member. This applies regardless of payment structure. Examples include a music tutor who invoices the school or an individual provided by a work-hire company.

Consistent with the Reportable Conduct Scheme, require the business to notify the school or ECS about reportable allegations or convictions that they become aware of, that is related to their worker during the time period the worker is engaged with the school or ECS as a result of this procurement.

For any business that is a regulated entity, employs people in regulated employment, or is a Child Safe Entity or Reporting Entity:

- Require compliance with the *Working with Children Checks Act 2000* and the *Child Safe Organisations Act 2024* as a mandatory condition of their engagement.
- Verify the business operator's Working with Children Authority (Blue Card) before they commence work and, at a minimum, on an annual basis. This verification must be recorded on the school or ECS Working with Children Register.
- For a sole operator, link their WWCA (Blue Card) to the school or service to enable real-time monitoring and oversight.

If a business operator does not require a WWCA (Blue Card), record their details and the reason for the exemption on the school's or ECS's Working with Children Register.

Strongly consider seeking a WWCA (Blue Card) for relevant individuals (e.g. guest speakers) where they would require one if the activity was provided in the school or ECS more than 7 days in a calendar year. Base this decision on the definitions of regulated employment and businesses in the *Working with Children Check Act 2000.* Please note the 7 day exemption for regulated employment/businesses is cumulative and is not limited to engagement with individual schools or ECS.

# Requirements

## 1. ENGAGEMENT AND OVERSIGHT OF EXTERNAL BUSINESSES (CONTINUED)

B

### ACTIONS FOR ASSESSING EXTERNAL BUSINESSES

To vet and manage external businesses, consider the following.

**ASK KEY QUESTIONS**

For example:

- What is your approach to children's safety and conduct expectations of workers?
- How do you screen, induct and train your workers regarding your approach to children's safety and conduct expectations?
- What are your processes for handling a child safety concern or complaint?

**OBTAIN INFORMATION AND UNDERTAKE AN ASSESSMENT**

DOCUMENTATION

Get copies of the providers relevant documents (e.g. code of conduct, child safe policy).

RISK ASSESSMENT

Request a written risk assessment, specific to the service or activity they will be providing.

PROOF OF COMPLIANCE

Ask for evidence of any relevant processes, such as their management of Working with Children Authorities (Blue Cards) and relevant insurance.

Seek to be satisfied of the quality of their documentation, asking for additional assurance if needed.

**IMPLEMENT CONTROLS AND MAINTAIN OVERSIGHT**

USE A FORMAL AGREEMENT

Include clauses in a contract, specifying any requirements to adhere to required expectations and outlining indemnity.

PROVIDE SUPPORT

It may be appropriate to support the business in meeting school or ECS safety standards by requiring participation in actions described in the school or ECS risk assessment for this activity or the Child Safe Action Plan.

MONITOR THE ACTIVITY

Designate a school or ECS staff member to oversee the activity.

# International Students (including Home Stay)

## Requirements

### 1. INTERNATIONAL STUDENTS, INCLUDING HOME STAY

Schools must be able to evidence the actions taken to both prevent and respond to child harm, inclusive of reportable conduct and any other legal obligations. Homestay programs must apply their own comprehensive procedures and processes, that meet all relevant obligations.

At minimum, these will include the following topics:

**HOST RECRUITMENT AND SCREENING, FOR EXAMPLE**

- Working with Children Authority (Blue Card) screening and oversight (see Section 7B of these procedures).
- A thorough suitability assessment of all potential homestay hosts.
- An initial physical site visit to verify the accommodation prior to its approval.

**HOUSEHOLD SUITABILITY ASSESSMENT, FOR EXAMPLE**

- Be able to evidence the use of thorough and documented processes to assess a host's suitability.
- Assess the suitability of all residents in the homestay facility who are over 18 years old.
- Evaluate any potential risks posed by children residing in the home.

**HOST TRAINING AND INFORMATION, FOR EXAMPLE**

- Provide comprehensive information and training to all hosts regarding their roles, responsibilities and conduct expectations.

**HOST MANAGEMENT AND REVIEW, FOR EXAMPLE**

- Implement robust management practices for all hosts, including regular reviews of their ongoing suitability.
- Schools must document and apply rigorous processes for the six-monthly review of each homestay placement.
- As outlined in the National Code, these reviews may utilise various mechanisms. However, they must be formally recorded to verify that a child's accommodation remains appropriate for their age and needs.

**PLACEMENT MATCHING, FOR EXAMPLE**

- Use clear and documented practices and processes for matching children with hosts.
- To the extent that is practicable, to support suitable matches, children are to be consulted on potential placements.
- Where applicable, cultural safety must be considered and documented. In these circumstances, it may be appropriate to consult with the child's family or community.

**PRE-PLACEMENT COMMUNICATION, FOR EXAMPLE**

- Ensure and be able to evidence effective pre-placement communication is provided to the children, setting clear expectations and providing support contacts.

# Requirements

## 1. INTERNATIONAL STUDENTS, INCLUDING HOME STAY (CONTINUED)

**PLACEMENT SUPPORT AND VERIFICATION, FOR EXAMPLE**

- Provide ongoing support to the child throughout the placement.
- Conduct verifications of the homestay at least every six months.

**STUDENT COMMUNICATION, WELFARE, AND CARE, FOR EXAMPLE**

- Maintain clear and consistent channels for communication with children.
- Provide ongoing welfre and care management for the child.

## 2. QUALITY ASSURNACE MECHANISMS

To ensure a high standard of safety, schools are to develop, implement, and embed specific quality assurance mechanisms into their management of international students and home stay. The following mechanisms are noted:

### A GOVERNANCE AND REPORTING

Establish Key Performance Indicators (KPIs) for relevant matters, e.g. homestay suitability verifications, internal Working with Children Authority Audits, and provision of safety information to children.

Implement appropriate governance and reporting mechanisms to regularly review these KPIs.

### B SEPARATION OF DUTIES

Separate the roles of assessor and decision-maker for host family approvals and verifications. These delegations are to be approved by the Principal.

The assessor can make recommendations, but the final approval must be made by a separate, delegated decision-maker.

Clearly define and document these roles in their respective position descriptions.

### C EMERGENCY CONTACT MANAGEMENT

Establish a strategy for managing emergency contacts available for children in homestay to access (e.g. a dedicated mobile number).

This function must be managed by more than one staff member to ensure business continuity, provide appropriate rest time, and prevent over-reliance on a single individual.

### D DEMAND MANAGEMENT AND RESOURCING

Develop a strategy to manage demand and ensure adequate resourcing. This should include identifying:

- An appropriate ratio of hosts to staffing.
- An appropriate ratio of children (including short-term tours) to staffing.

### E EFFECTIVE COMMUNICATION

Implement a strategy for effective communication with children and maintain evidence of these communications. This includes:

- Providing culturally and developmentally appropriate information on emergency contacts and what is abuse or inappropriate conduct and how to report these.
- Saving records of written communications used to share legally required information (e.g. orientation PowerPoint slides, emergency contact cards), including version control and dates.

# Boarding, Billeting and other Overnight Accommodation (including camps)

When unrelated children and/or adults share overnight accommodation the risk to child safety is inherently high. Schools must be able to demonstrate that they are sufficiently satisfied that the designated adult supervisor can provide safe care in all overnight accommodation settings. This requires a rigorous assessment of the supervisors' suitability and the safety of the environment.

All arrangements of this nature must have documented assessments that consider the hazards to children and all reasonable actions that are to be taken to mitigate resulting risks.

## Requirements

### 1. HIGH-RISK CIRCUMSTANCES AND RISK FACTORS

Without limiting the factors that may be considered, consideration will be given to high-risk circumstances, including where care is being provided:

- by persons unrelated to the child;
- by any adult in Australian accommodation (including boarding houses) who has spent substantial periods of time living overseas due to the limitations of Working with Children Authorities;
- or currently residing in another country.

Consideration must also be given to the risk of harm arising from the conduct of other children.

### 2. MINIMUM RISK CONTROL MEASURES

Risk assessments for overnight accommodation must consider all reasonably foreseeable hazards, with the following minimum risk control measures specifically identified for consideration:

A

**BRIEFING OF RESPONSIBLE ADULTS**

Ensure that all adults taking responsibility for a child's care (including host parents and any other persons or organisations involved) are briefed appropriately. This briefing should cover:

EXPECTED CONDUCT

Clearly define the professional and ethical conduct expected of them while providing care.

CARE AND SUPERVISION

Specify the level of care and supervision they are required to provide, including supervision ratios and age-appropriate expectations.

CHILD'S BEHAVIOURAL REQUIREMENTS

Outline the behavioural expectations for the child and the steps to be taken if the child breaches these requirements.

EMERGENCY PROCEDURES

Detail all emergency protocols, including contact information for the school's emergency personnel.

REPORTING CONCERNS

Clearly explain the process for reporting any child safety concerns or disclosures.

# Requirements

## 2. MINIMUM RISK CONTROL MEASURES (CONTINUED)

### B PROVIDE CHILDREN WITH EXPLICIT INSTRUCTIONS THAT COVER THE FOLLOWING KEY AREAS

STANDARD OF CARE

Clearly explain the standard of care they should expect to receive from all adults.

BEHAVIOURAL EXPECTATIONS

Outline the expected conduct for both themselves and their peers.

SEEKING HELP

Inform them of multiple, appropriate, and immediately accessible options for help. They must know who to talk to if they are worried or concerned about something.

### C WORKING WITH CHILDREN CHECKS FOR ALL RELEVANT PERSONS

Ensure all relevant adults (e.g. all household members in a billeting family) hold a current Queensland Working with Children Authority (Blue Card) or its jurisdictional equivalent.

If a check is not legally required and cannot be obtained, this must be explicitly communicated to the approver of the activity. The approver must then be satisfied that other strategies in place are sufficient to meet the school's legal obligation to take all reasonable actions to prevent harm.

### D HOMESTAY AND BILLETING ARRANGEMENTS

For homestay and billeting arrangements, it is highly recommended to place children with other children to prevent isolation.

Ideally, the child should be placed in a home with children of a similar age.

Whenever possible, place children together in groups with children who are known to them, with three or more, to provide a peer support and supervision.

Consider the information known, or able to reasonably be obtained about these children, to inform the risk assessment.

### E APPROPRIATE AND SAFE CARE ENVIRONMENTS

Ensure the provision of an appropriate and safe care environment for children. This includes:

SLEEPING ARRANGEMENTS

Children must have a safe, private, and suitable sleeping space.

PRIVATE FACILITIES

Children must have appropriate access to private spaces, such as bathrooms and toilets.

### F CONDUCTING NEEDS ASSESSMENTS

Before any trip, schools must conduct an assessment of all children proposed to attend, with particular focus on identifying those who may be vulnerable or have heightened needs.

A pre-trip assessment must be undertaken to determine if the child's needs can be met and if the trip is sufficiently safe for them. Where practicable, children should be involved in the assessment process.

Relevant school staff (e.g. the school psychologist and pastoral care team) must be given the opportunity to help identify children of potential concern.

Where applicable, cultural safety considerations must be considered and documented. In these circumstances, it may be appropriate to consult with the child's family or community.

### G COMMUNICATION

Ensure appropriate and documented communication with all relevant stakeholders. This communication must clearly outline safety protocols and expectations for everyone involved, including children, parents/guardians, supervising staff, and any host families or organisations.

## Requirements

### 3. SCHOOL CAMPUS ACCOMMODATION REQUIREMENTS

A risk assessment and plan are mandatory for all individuals residing in school campus accommodation. At a minimum, this plan must include the following conditions:

**WORKING WITH CHILDREN AUTHORITY (BLUE CARDS)**

Wherever possible, all adult household members must have a Blue Card linked to the school before the living arrangement begins.

**ALTERNATIVE SCREENING**

If an adult is not legally required and cannot obtain a Blue Card (e.g. they are not in regulated employment), they must, prior to commencement:

- Provide a current National Police Clearance and agree to renew it at least annually.
- Confirm in writing that they are not a restricted person under the *Working with Children Check Act 2000*.
- Agree in writing to inform the Principal of any changes to their police information, including new cautions or charges, and any known matters under investigation through the Reportable Conduct Scheme.

**PRINCIPAL'S DISCRETION**

Any decision to ask a person to immediately cease residing on the school grounds is to be at the Principal's discretion.

# 9 Glossary

# Glossary

**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.

**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.

**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.

**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.

**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*

**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*

10

# Practice Resources

# 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


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