

Student Protection Policy

Approved by INC National Executive (the Governing Body)
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Student Protection Policy

Board and College Policy 7.1	First Issued	January 2006
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1. INTRODUCTION

Citipointe Christian College is committed to preventing harm to students and staff by providing a safe and supportive learning environment for all students and College staff. Any behaviour which jeopardises such an environment will not be tolerated. This Policy conforms with relevant Child Safety Legislation.

2. PURPOSE

There are several written policies at Citipointe Christian College which address the safety and wellbeing of students and staff. The purpose of this policy is to make clear the reporting and response process when inappropriate behaviour or harm, sexual abuse or neglect to a student, whether internal or external to the College, is disclosed or suspected.

Where there is any conflict between the Student Protection Policy and other College policies, the former will prevail.

3. DEFINITIONS

Relevant Person¹

- A student under 18 years attending the school (College);
- A kindergarten age child registered in a kindergarten learning program at the school (College);
- A person with a disability who
 - Under section 420(2) of the Education (General Provisions) Act 2006 is being provided with special education at the school (College); and
 - Is not enrolled in the preparatory year at the school (College).

This term is usually used in regards to sexual abuse.

Relevant Child²

- A child in need of protection; or
- A child who may become a child in need of protection if preventative support is not given to the child or the child's family.

This term is usually used in regards to physical, psychological or emotional abuse or neglect.

Child

A person up to the age of 18 years of age³.

A Child in need of protection

Section 10 of the Child Protection Act 1999 (Qld) defines "a child in need of protection" as a child who—

- a) has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and
- b) does not have a parent able and willing to protect the child from the harm.

¹ Education (General Provisions) Act 2006 (Qld) S366 and 366A (a) to (c)

² Child Protection Act (Qld) 1999 S159BA

³ With the exception to references to an Accountable Person where a child is defined as a person under 16 years or a person with an impairment of the mind - Criminal Code Act 1899 (Qld) S229BC(1)(b)

Student

A student is any person regardless of age who is enrolled at the College (including Citipointe Christian College International).

Governing Body

The National Executive of Christian Outreach Centre trading as International Network of Churches

Director

A member of the Governing Body.

College Board

The Board appointed by the Local Church Committee of Management by authority of the Governing Body to oversee the day-to-day management of the College.

Board Member

A member of the College Board.

Department of Children, Youth Justice and Multicultural Affairs

In this policy the Department of Children, Youth Justice and Multicultural Affairs will be referred to as Child Safety Services

Significant Harm⁴

Significant harm 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:

- A single act, omission or circumstance; or
- A series or combination of acts, omissions or circumstances.
- Physical, psychological or emotional abuse or neglect;
- Sexual abuse or exploitation.

Sexual abuse⁵

Sexual abuse, in relation to a relevant person includes sexual behaviour involving the relevant person and another person in the following circumstances:

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

Grooming⁶

Grooming refers to the way some offenders form relationships and build trust with parents, carers, teachers and other children in order to get close to a child and create the opportunity for sexual abuse. Grooming can be difficult to identify as the behaviour itself may not be abusive or sexual. It is also important to note that not all offenders use grooming techniques⁷.

Neglect

The term neglect in this policy may be defined as any act or omission causing harm to a child by any person. Neglect occurs when a child's basic necessities of life (example: food, housing, health care and medical treatment, adequate clothing, personal hygiene and adequate supervision) are not met, and their health and development are affected.

⁴ Harm as defined under section 9 of Child Protection Act 1999

⁵ Education (General Provisions) Act 2006 S364

⁶ Criminal Code Act 1899 (Qld) Schedule 1, Part 4, Chap 22, S218B (2)

⁷ <https://www.qld.gov.au/community/getting-support-health-social-issue/support-victims-abuse/child-abuse/child-sexual-abuse/child-sexual-abuse-protect>

Inappropriate behaviour by a staff member towards a student: Inappropriate behaviour is NOT defined by law. For the purpose of this policy inappropriate behaviour includes any unwelcome behaviour by a College employee towards a College student that the student is uncomfortable with and breaches the trust implicit in a normal adult-student relationship, as defined by accepted societal values, professional and contractual obligations, current legislation and/or legal precedent. Behaviour which would be regarded by a reasonable person to be inappropriate between an adult and a child will be responded to as such even if the child does not reject it or indicates it is unwelcome.

Reportable Suspicion

A reportable suspicion is one where a staff member:

- (a) has a reasonable suspicion that a relevant person or relevant child has suffered, is suffering, or is at an unacceptable risk of suffering significant harm caused by physical, psychological or sexual abuse; and
- (b) may not have a parent able and willing to protect the relevant person or relevant child from harm.

Reasonable Suspicion⁸

A suspicion formed on grounds that are reasonable in the circumstances. The Child Protection Act⁹ also states that:

- (a) matters that may be considered when forming a reasonable suspicion include:
 - (i) whether there are detrimental effects on the child's body or psychological or emotional state that are evident or likely to become evident in the future; and
 - (ii) the nature and severity of the detrimental effects and the likelihood they will continue; and
 - (iii) the child's age.
- (b) a reasonable suspicion may be informed by observation of the child, other knowledge of the child or any other relevant knowledge, training or experience the person forming the suspicion may have.

Teacher

A person employed in the capacity of a registered teacher at Citipointe Christian College, and includes full time, part time, casual and re-appointments.

General Staff

Includes those involved in administration, teaching assistants, groundsman, cleaners, coaches, referees and volunteers, paid and unpaid, working in any capacity within the College.

Staff

Includes all workers at the College including volunteers.

Citipointe Christian College

Includes Citipointe Christian College International.

Notifier

A person who brings notice of significant harm to the attention of the College.

Student Protection Contact Officer

The named and published staff member, as required under the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) S16, to whom students may refer complaints.

⁸ Department of Education Queensland **Student Protection Procedures (Version 10.4 17/10/2023)** <https://ppr.qed.qld.gov.au/pp/student-protection-procedure>

⁹ Child Protection Act (Qld) 1999 S13c

Appropriately Qualified Individual

A person, not being the College Principal, nor a member of College staff, who possesses the qualifications, experience or standing appropriate to perform the function of receiving a report and giving a copy of the report to a Police officer under section 366 or 366A of the Education (General Provisions) Act 2006 on behalf of the Governing Body.

Delegated Appropriately Qualified Individual

The person appointed unanimously by the Governing Body, delegated with the directors' reporting function under section 366B of the Education (General Provisions) Act 2006 (Qld). (Specifically, the person listed in 7.1.1 Student Protection Policy Contact Details for Reporting).

Employee (of the College)

A person engaged to carry out work at the College for financial reward.

Accountable Person

An accountable person is an adult who is associated with the College. This includes all staff at the College, including but not limited to, teachers, administration staff, ancillary staff, contactors, tutors and volunteers.

Independent Protection Advisor

A person appointed by the College, who is independent of the College, but available for assessment of complaints.

Vexatious Complaint

A complaint which has no substance and which may be brought with ill intent. Vexatious complaints may have serious consequences under College policy and legislation.

Unacceptable Risk

If the report of alleged abuse is of such concern that in the reasonable view of the Principal (with consultation) the person implicated would be a danger – that person can be stood down or suspended in the interim.

4. THE LAW ¹⁰

- Age Discrimination Act 2004 (Cth)
- Anti-Discrimination Act 1991 (Qld)
- Australian Human Rights Commission Act 1986 (Cth)
- Child Protection Act 1999 (Qld)
- Civil Liability Act 2003 (Qld)
- Crimes Amendment (Working With Children—Criminal History) Act 2010 (Cth)
- Criminal Code Act 1889 (Qld)
- Common Law – Contract and Duty of Care (Cth) (Qld)
- Disability Discrimination Act 1992 (Cth)
- Education (General Provisions) Act 2006 (Qld)
- Education (General Provisions) Regulation 2017 (Qld)
- Education (Queensland College of Teachers) Act 2005 (Qld)
- Education (Accreditation of Non-State Schools) Act 2017 (Qld)
- Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)
- Education and Training Amendment Act 2011 (Qld)
- Education Services for Overseas Students Act 2000 (Cth) – referred to as the ESOS Act 2018, hereafter.
- Limitation of Actions Act 1974 (Qld)

¹⁰ All references to legislation include amendments as of 01/09/2022

- National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Sex Discrimination Act 1984 (Cth)
- Work Health & Safety Act 2011 (Qld) Working with Children (Risk Management and Screening) Act 2000 (Qld)

The College has written processes in place to enable it to comply with the requirements of the Work Health and Safety Act 2011 (Qld) and the Working with Children (Risk Management and Screening) Act 2000 (Qld).

NB: In relations to Child Protection, the College is aware of the legislative action taken to amend laws to ensure a cohesive framework to protect victims of violence and their children¹¹, some of whom may be part of our school community. The College will support amendments as they relate to the requirements that schools respond as required to assist in the provision of safety to the families and staff experiencing violence, including with:

- Providing paid leave as legislated;
- Increased attentiveness to DV Orders (now to be more specific to each family circumstance); including:
 - Family Court Orders, and amendments to Orders;
 - Availability of Greater Police interventions.

5. PRINCIPLES

This policy is founded on the following principles:

- The mandatory reporting to the appropriate authorities the reasonable suspicion that a relevant person or relevant child has suffered, is suffering, or is at an unacceptable risk of suffering significant harm caused by physical, psychological or sexual abuse¹²;
- Every student has a right to protection from harm. Protecting students from harm and the risk of harm is fundamental to maximising their personal and academic potential.
- The welfare and best interests of the student will always be a primary consideration.
- All children are vulnerable but some children need special care and protection to ensure they are safe. The College recognises that children with disability have an increased risk of suffering harm.
- Families have the primary responsibility for the upbringing, protection and development of their children.
- In all actions taken by the College, the best interests of the student will always be a primary consideration and include the reporting of any harmful behaviour, regardless of family issues.
- As part of its pastoral care commitments, the College will provide appropriate support to the student and family when an alleged abuse or inappropriate harm has taken place.
- The College will screen new staff/volunteers in relation to the suitability to work with children.
- The College will not tolerate harmful behaviours. Such behaviours will result in penalties being imposed by the College.
- The College will provide pastoral care to alleged offenders if they are students or employees of the College.
- The confidentiality of all parties will be respected.

¹¹ <https://www.justice.qld.gov.au/initiatives/end-domestic-family-violence/our-progress>

¹² Appropriate Authorities include, but are not limited to the Queensland Police Service, Department of Child Safety, Sensors and Disability Services Queensland and The Queensland College of Teachers.

Natural Justice

The principle of natural justice will apply to processes and decisions under this policy.

The principles of *Natural Justice* are that:

- A person alleged to have behaved improperly has a right to particulars of what has been allegedly done.
- The right to respond to the allegations.
- The person has a right to be heard in an unbiased forum.

Note: In instances where the alleged person is involved with or suspected of physical and/or sexual abuse of a relevant person, it may not be appropriate or permissible to inform the alleged perpetrator. Instead, the police need to be informed and the authorities will make the necessary contact.

Confidentiality

It is important when handling complaints information that the confidentiality of all parties concerned is respected. Information will be regarded as confidential if:

- The information has the 'necessary qualities of confidence' in that any unauthorized use would be detrimental to a party and that;
- It was shared or confided under circumstances where there was a special need for trust, i.e. between the harassment officer and the complainant, or between the Principal and the alleged offender. This special need for trust does not negate or take precedence over the mandatory reporting requirements for significant harm set out in the Child Protection Act 1999 (Qld)¹³ and the mandatory reporting requirements for sexual offences set out in The Criminal Code Act 1899 (Qld)¹⁴. Information will be shared only with other parties as required by law.

6. SCOPE

This policy and the procedures contained herein will apply to all concerns/complaints/allegations of inappropriate conduct, harm or sexual abuse caused to a student or relevant child at the College, whether they occur internally or externally. This policy is to be read in conjunction also with the ESOS Act 2018. It applies to all staff, as well as contractors, volunteers and people undertaking work experience or vocational placements at the College, students, relevant persons and relevant children

7. POLICY STATEMENT

Under this policy:

1. The College will adhere to the mandatory reporting process imposed by law – to Police, Child Safety Services and the Queensland College of Teachers.
2. All staff, contractors and volunteers must ensure that their behaviour towards and relationships with students reflect proper standards of care for students. Staff, contractors and volunteers must not cause harm to students¹⁵.
3. All staff who become aware of allegations of harm, inappropriate behaviour or reasonable suspected harm towards a student must report to College delegates/the Principal as required by this Policy including their responsibility as mandatory reporters.
4. All staff are considered an accountable person under Criminal Code Act 1899 (Qld)¹⁶. An accountable person commits a crime if they know there is a significant risk that another adult will commit a child sexual offence in relation to a child and willfully or negligently fails to reduce or remove the risk to the child¹⁷.
5. The College will work with State Authorities and in community partnership with Agencies

¹³ The Child Protection Act 1999 (Qld) S13E, S13G, 13H and 13I

¹⁴ The Criminal Code Act 1899 (Qld) S229BB and 229BC

¹⁵ Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) S16(1)

¹⁶ The Criminal Code Act 1899 (Qld) S229BB and 229BC

¹⁷ The Criminal Code Act 1899 (Qld) S229BB (1)(a)(f)

and parents concerning student protection issues.

6. The College may report at the discretion of the Principal other matters of harm, abuse and criminality which are not mandatory to State Authorities.
7. The College has internal processes in place to address matters (i.e. not physical or sexual harm) that are not reported/referred externally.
8. Failure to follow this policy will result in College disciplinary measures additional to any penalties which may apply at Law.
9. Formal grievances, disputes and/or complaints arising from the processing or outcomes of this policy may be engaged by accessing the College's Board 11.4 Community Complaints and Feedback policy¹⁸ located on the College's network storage platform and accessible to parents, students and staff from the College website.

8. RESPONSIBILITIES

a) The Governing Body

- The Governing Body is responsible for ensuring that health, safety and conduct of staff and students' processes are implemented in accordance with the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld), S16(4) (6) via delegation to the College Board through the Local Church Committee of Management.
- The Governing Body is responsible for the development of and compliance with this policy.
- The Governing Body is responsible for the appointment of an Appropriately Qualified Individual to receive and report any allegations relating to sexual abuse of a relevant person on behalf of the Governing Body.

b) The College Board

- The College Board is responsible for compliance with this policy at the individual College level as delegated by the Governing Body whose responsibility is outlined in accordance with the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld), S16(4). The College Board is responsible for establishing and maintaining the College formal complaints policies (11.4 Community Complaints and Feedback Policy and 11.6 Complaints Handling and Feedback Policy [Staff]) which covers complaints arising out of this Policy.

c) The Principal is responsible for:

- Ensuring they are conversant with relevant legislation (including the ESOS Act 2018) and this policy;
- Ensuring that their own behaviour neither encourages nor supports behaviour in others which may undermine the intention of this policy;
- Ensuring that all staff, for whom they are responsible, understand and fulfil their responsibilities within this policy;
- Appointing the College Independent Student Protection Adviser and Student Protection Contact Officers¹⁹;
- Ensuring that all staff know that they must not, in any circumstances, engage in sexual conduct of any nature with a student who is enrolled at Citipointe Christian College, or any harmful or inappropriate behaviours. It is irrelevant whether the sexual conduct is consensual or non-consensual, or condoned by parents or caregivers. The ages of the student or employee involved are also irrelevant;
- Ensuring the College has sound recruitment and screening processes in place for staff and volunteers:

¹⁸ 11.6 Complaints Handling and Feedback Policy (Staff) policy is to be used for staff initiated complaints

¹⁹ Annexure K

- Making it clear that victimization of students or others making a complaint will not be tolerated;
- Ensuring that student management practices are administered in a manner which maintains the student's dignity;
- Reporting, if deemed necessary under the mandatory reporting laws, particulars of allegations made against Citipointe Christian College to the Queensland Police Service and/or Child Safety Services;
- Receiving any complaint/allegation made whether directly, or through a staff member or Student Protection Contact Officer;
- Assessing the complaint/allegation and, in cases regarding inappropriate behaviour, ensuring that assistance is sought from the College Independent Protection Advisor to decide upon the response; and
- Working with the Delegated Appropriately Qualified Individual in all matters concerning responding to and reporting sexual abuse.

d) Independent Protection Advisor:

- Will be available to advise on the safety of students, as required.

e) Staff are Responsible for:

- Complying with this policy and procedures;
- Reporting complaints/allegations/suspicions/information of inappropriate behaviour, harm or abuse (which are not sexual abuse) to the appropriate Student Protection Contact Officer and/or the Principal (*Annexure A & D*);
- Reporting of all sexual abuse, suspected sexual abuse or likely sexual abuse to the Principal or Delegated Appropriately Qualified Individual;
- Making clear and objective notes of what they suspect or have been told. (See *Student Protection Forms – Annexure B – D*);
- Protecting confidentiality;
- Complying with the ESOS Act 2018 when dealing with international students; and
- Reducing or removing the risk if they know there is a significant risk that another adult will commit a child sexual offence in relation to a child.²⁰

Under this Policy the obligation to report is placed upon all staff with consultation with the Principal or the Delegated Appropriately Qualified Individual. The Principal will work within the College's Christian worldview when consulted with concerning all student protection issues.

f) Student Protection Contact Officers²¹

- Will be appointed by the Principal in each of the sub-schools;
- Will undertake training in the requirements of the role;
- Will be known to staff and students, and should be persons that will be accessible;
- Will follow the procedures set out in this policy; and
- Must inform the Principal of all incidents brought to their attention.

g) Students

All students are expected to contribute to the care and wellbeing of other students by complying with all College policies, rules and directions.

Students are encouraged to report any behaviour of staff that they consider inappropriate to a Student Protection Contact Officer.

²⁰ The Criminal Code Act 1899 (Qld) S229BB(1)

²¹ Annexure K

h) Responsibilities under Criminal Code Act 1899 (Qld)

The Criminal Code Act 1899 (Qld) includes two offences that pertain to the failure to report a child sexual offence and the failure to protect a child against a child sexual offence. A child sexual offence is an offence of a sexual nature by an adult against a child under 16 years or a person with an impairment of the mind.

(i) Failure to Report²²

Under section 229BC of the Code, all adults must report sexual offences against a child by another adult to police as soon as reasonably practicable after the belief is, or ought reasonably to have been, formed. Failure to make a report, without a reasonable excuse, is a criminal offence. This offence applies to all adults inclusive of students 18 years or older, as well as parents/guardians and volunteers at the school. A reasonable excuse not to make a report under the Criminal Code Act 1899 includes that a report has already been made under the Education (General Provisions) Act 2006 (Qld) (reporting sexual abuse or likely sexual abuse) and the Child Protection Act 1999 (Qld) (reporting significant harm or risk of significant harm) as per this policy.

(ii) Failure to Protect²³

Under section 229BB of the Code, all adults in positions of power or responsibility within institutions to reduce or remove the risk of child sexual offences being committed must take reasonable steps to protect children in their care from a child sexual offence. A failure to protect is an offence.

9. DEALING WITH ALLEGATIONS OF HARM, SEXUAL ABUSE, INAPPROPRIATE CONDUCT AND SELF INJURY

A) SEXUAL ABUSE

- (a) The following outlines the procedures for reporting of known, suspected or likely sexual abuse which will apply in Citipointe Christian College.

Where a reference is made to **PROVIDING A WRITTEN REPORT** in the procedures below, the following matters are to be included in the written report (required under S68 & 68a Education (General Provisions) Regulations 2017 (Qld))²⁴:

- (i) Name of the person giving the Report (the Notifier);
- (ii) The relevant person's name and sex descriptor (the person who it is suspected has been sexually abused or is likely to be sexually abused);
- (iii) Details of the basis for the Notifier becoming aware, or reasonably suspecting, that the relevant person has been sexually abused by another person;
- (iv) Details of the abuse or suspected abuse;
- (v) Any of the following information of which the Notifier is aware
 - a. the relevant person's age;
 - b. The identity of the person who has abused, or is suspected to have abused, the relevant person;
 - c. the identity of anyone else who may have information about the abuse or suspected abuse²⁵.

If a staff member is aware or reasonably suspects that a relevant person has been sexually abused or is likely to be sexually abused, a written report must be given to either the Principal or the Delegated Appropriately Qualified Individual immediately²⁶.

Without removing the mandatory obligation of the staff member to report the allegation, the Principal or Delegated Appropriately Qualified Individual must immediately contact the Police and

²² Criminal Code Act 1899 (Qld) s.229BC

²³ Criminal Code Act 1899 (Qld) s.229BB

²⁴ Annexure A and Annexure D - Student Protection Form 3

²⁵ Education (General Provisions) Regulation 2017 (Qld) S68

²⁶ Annexure B- E, Student Protection Forms 1 -5

provide them with a copy of the report (Student Protection Form 3) and Student Protection Record. (Where State Authorities Interview Student or Relevant person at the College).

The Principal or the Delegated Appropriately Qualified Individual must also provide a copy of the report to the governing body (i.e. INC – International Network of Churches).

If the Principal is the first person who is aware or reasonably suspects that a relevant person has been sexually abused or is likely to be sexually abused, the Principal must immediately provide a written report to a police officer and also provide a copy of the report to the Governing Body (i.e. INC – International Network of Churches).

If the Delegated Appropriately Qualified Individual is the first person who is aware or reasonably suspects that a relevant person has been sexually abused or is likely to be sexually abused the Delegated Appropriately Qualified Individual must immediately provide a written report to the Principal and a police officer and also provide a copy of the report to the Governing Body (i.e. INC – International Network of Churches).

B) REPORTABLE SUSPICION – Sexual Abuse²⁷

Reporting harm as a result of a child sexual offence under Section 229BC of the Criminal Code Act 1889 (Qld)

Staff Obligations:

The Criminal Code Act 1899 (Qld)²⁸ names all adults as mandatory reporters in regard to child sexual offences

If:

You have a “reportable suspicion”, i.e. a reasonable suspicion, that a child sexual offence is being or has been committed against a student

1. Complete the College’s reporting forms²⁹;
2. Consult/discuss your concerns with the Principal or the Delegated Appropriately Qualified Individual;
3. The teacher/staff member will make the report to Child Safety Services as the “Notifier”;
4. The Principal will acknowledge the receipt from teacher/staff member of a copy of the report;

Or

1. If you suspect the Principal is involved in the abuse, directly inform the Delegated Appropriately Qualified Individual (refer to the contact details on the first page of the policy) prior to making a report (as mandatory reporter) to Child Safety Services (and providing a copy of the report to the Delegated Appropriately Qualified Individual);
2. Keep appropriate records of your decisions and actions.

A report under this section must include the following particulars:

- a) the basis on which the person has formed the reportable suspicion³⁰;
- b) the child’s name, age and sex descriptor;
- c) details of how to contact the child;
- d) details of the harm to which the reportable suspicion relates;
- e) particulars of the identity of the person suspected of causing the child to have suffered, suffer, or be at risk of suffering, the harm to which the reportable suspicion relates;

²⁷ Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) S16(2)(c)

²⁸ The Criminal Code Act 1899 (Qld) S229BB

²⁹ Annexure B – Student Protection Form 1 and Annexure D – Student Protection Form 4

³⁰ Child Protection Act 1999 S13G (2)(a)

- f) particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates³¹.

The College recognises that a student may not meet the criteria of a relevant person (as set out in Section 3: Definitions) if over the age the 18. However, due to the inherent imbalance of the teacher/student relationship where the student has less power than the teacher, there exists a *jus naturale*. Due to this, any sexual behaviour or suspected sexual behaviour involving a student over the age of 18 and a teacher, while not meeting the requirements of mandatory reporting as set out in the Education (General Provisions) Act 2006 (Qld)³², must be reported to the Principal, a Director of the Governing Body or the delegated Appropriately Qualified Individual.

C) REPORTABLE SUSPICION – Physical Abuse

Reporting harm as a result of physical abuse under Sections 13E and 13G of the Child Protection Act 1999 (Qld).

Staff Obligations:

If:

- You are a teacher/staff member (the obligation to report is extended to all staff under this Policy); **and**
- You have a “reportable suspicion”, i.e. a reasonable suspicion that a relevant child—
 - a) has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical abuse; **and**
 - b) may not have a parent able and willing to protect the relevant child from the harm.

Then:

1. Complete the College’s reporting forms³³;
2. Consult/discuss your concerns with the Principal or the Delegated Appropriately Qualified Individual;
3. The teacher/staff member will make the report to Child Safety Services as the “Notifier”;
4. The Principal will acknowledge the receipt from teacher/staff member of a copy of the report;

Or

1. If you suspect the Principal is involved in the abuse, directly inform the Delegated Appropriately Qualified Individual (refer to the contact details on the first page of the policy) prior to making a report (as a mandatory reporter) to Child Safety Services (and providing a copy of the report to the Delegated Appropriately Qualified Individual);
2. Keep appropriate records of your decisions and actions.

A report under this section must include the following particulars:

- a) the basis on which the person has formed the reportable suspicion³⁴;
- b) the child’s name, age and sex descriptor;
- c) details of how to contact the child;
- d) details of the harm to which the reportable suspicion relates;
- e) particulars of the identity of the person suspected of causing the child to have suffered, suffer, or be at risk of suffering, the harm to which the reportable suspicion relates;
- f) particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates³⁵.

³¹ See Child Protection Regulation 2023 (Qld) S4 “Information to be included in reports”

³² Education (General Provisions) Act 2006 S366 and S366A

³³ Annexure B –Student Protection Form 1 and Annexure D – Student Protection Form 4

³⁴ Child Protection Act 1999 S13G (2)(a)

³⁵ See Child Protection Regulation 2023 (Qld) S4 “Information to be included in reports”

The College recognises that a student may not meet the criteria of a relevant person (as set out in Section 3: Definitions) if over the age the 18. However, due to the inherent imbalance of the teacher/student relationship where the student has less power than the teacher, there exists a *jus naturale* Due to this, all physical abuse or suspected physical abuse involving a student over the age of 18 and a teacher, while not meeting the requirements of mandatory reporting as set out in the Child Protection Act 1999³⁶ must be reported to the Principal or the delegated Appropriately Qualified Individual.

NB: If a staff member is suspected of having inappropriate behaviour or harm towards a student it is the prerogative of the Principal/Governing Body to require the teacher or staff member be relieved of all duties that have student contact whilst the suspicion is investigated. The duration of this variation of duty should not be longer than 20 days.

Principal's, Directors' of the Governing Body, Delegated Appropriately Qualified Individual's Obligations:

If:

- You are the Principal, Director, Delegated Appropriately Qualified Individual; **and**
- A staff member (other than a staff member required to make a mandatory report e.g. teacher or registered nurse) under the College Policy reports a "reportable suspicion" to you; **and**
- You are aware or reasonably suspect the harm to have been caused **and** you are aware or reasonably suspect that the student may not have a parent willing and able to protect them.

Then:

1. Ensure that the College's reporting forms are completed;
2. If a report has not already been made by a teacher, make a report to Child Safety Services;
3. Inform the Governing Body through the Delegated Appropriately Qualified Individual of the staff member's report;
4. Keep appropriate records of your decisions and actions.

D) REPORTABLE SUSPICION - Psychological, Emotional Harm Neglect or Exploitation

- (i) Should a staff member form a suspicion, observe harmful conduct or have harm disclosed to them, that staff member must inform the appropriate Student Protection Contact Officer by **providing a written report**³⁷.
- (ii) The Student Protection Contact Officer must inform and consult with the Principal or their delegate (Head of School) in the absence of the Principal
- (iii) The Student Protection Contact Officer, in order to establish there are reasonable grounds for suspicion, may consult with the Independent Protection Advisor.
- (iv) The Principal will, at their discretion:
 - Still report to Police or Child Safety Services
 - Adopt internal supports and remedies including:
 - Contacting parents to discuss partnership actions under contract,
 - Investigating
 - Referral to Family and Child Support Services
 - Pastoral Initiatives.

³⁶ Child Protection Act 1999 (Qld) S13E, S13G and S159BA

³⁷ Annexure A, Annexure B - Student Protection Form 1 and Annexure D – Student Protection Form 4

NB: In cases of actual or suspected harm, the role of the Student Protection Contact Officer is not an investigative one and the Student Protection Contact Officer will not undertake investigations beyond satisfying him/herself that s/he has reasonable grounds to suspect that a student has been, or is, at risk of harm. The Student Protection Contact Officer is not obliged to obtain proof, establish the cause of harm or assess its severity.

E) INAPPROPRIATE BEHAVIOUR

- i) Students are encouraged, and staff are required to report any inappropriate behaviours of staff to a Student Protection Contact Officer.
- ii) The Student Protection Contact Officer will report the matter to the Principal.
- iii) The Principal will meet with the alleged offender to inform him/her of the allegation and to hear the alleged offender's response to the allegation. The Principal will initiate the investigation ask questions concerning the particularized allegations.
- (v) An outside investigator will conduct an investigation process and present a report to the Principal to assist with decision making.
- v) If there is unacceptable risk, the Principal will stand down the alleged offender (in extreme cases, dismiss them summarily).

The Principal will:

- Put in place any disciplinary consequences.
- Offer support to the student and the respondent.
- Inform the student's parents.
- Inform the College's governing body.
- Inform the College's insurers.

NB: Where a complaint/allegation is found to have no substance, every effort will be made to reinstate the alleged offender's status and reputation.

10. PROTECTIVE BEHAVIOURS – GUIDELINES FOR STAFF

- When interviewing, talking to, or tutoring a student, be cautious of never being alone or in a private setting.
- While counselling/advising a student requires a confidential setting – have a place with appropriate safeguards, e.g. a pane of glass in the door so staff personnel (not student) can be seen.
- Do not choose a place which is too isolated or overly private. Prefer group activities to working with students individually.
- Segregation of staff and student amenities must be observed.
- Be circumspect when supervising amenity blocks, change rooms and toilets. Announce your approach loudly.
- Make sure camps and excursions are authorised by parents and a minimum of 2 adult supervisors attend any overnight camp. A gender balance in the number of adults attending is preferred.
- Never invite a student to your home.
- If responding to a crisis, advise the Head of School immediately.
- Never **personally** search a student or his property. Prefer they turn out pockets, bags, etc., with a witness in attendance. Make a diary note of persons present.
- Ask the student's permission to touch. Remember that a distressed student may not be able to convey this.
- Never assume that physical contact is acceptable to a student. Remember you don't know what the student has experienced at home or elsewhere.
- Use verbal directions rather than touch when appropriate. For example, ask a student to move, rather than redirect with a touch.
- Use only physical contact that is least likely to be misconstrued, such as using a high-five

rather than a hug.

- Respect the signs that a student is uncomfortable with touch.

11. **TIMELY RESPONSE**

Matters of abuse will be handled as a priority taking into account the complexity and implications of such accusations. The Principal will ensure a timely response to the allegations which will serve the best interests of all parties.

12. **INVESTIGATION**

- a) The College does not investigate mandatory reporting matters or an alleged criminal offence. That is a matter for the appropriate State and/or Commonwealth authorities. The College will cooperate with any government authority investigating a mandatory reporting matter.
- b) For an action falling short of mandatory reporting of a student, the College may decide on a number of responses including investigating the matter internally or with the assistance of an external investigator.

13. **CONSEQUENCES of BREACH of POLICY**

- a) Causing abuse to a student or relevant persons or children may attract criminal penalties as decided by legal process; Employment penalties will follow state investigations.

In criminal cases the Principal will stand down a staff member pending the results of an investigation by the Police.

- b) Breaches of inappropriate conduct, which may not result in reporting or external penalties, will result in consequences imposed by the Principal and may include:
 - apology
 - counselling
 - warning
 - demotion
 - suspension
 - standing aside
 - termination of employment

14. **RECORD KEEPING**

Any staff member who has concerns about harm to a student, relevant person or relevant child (including physical and sexual harm), either suspicious or disclosed, **MUST**

- a. Keep anecdotal records of observations, focusing on the persistence of indicators over time and the severity of effects;
- b. If speaking to a student, relevant person or relevant child, keep questions to what/where/when
- c. Take only short notes – must not investigate;
- d. Present physical and sexual harm documentation to the Principal or Delegated Appropriately Qualified Individual;
- e. Present other forms of harm (which are not mandatory reporting) to the Student Protection Contact Officer (Annexure B).

Should the Principal need to interview the student, relevant person or relevant child further, the same procedures must be followed – this is not an investigation. Records must be kept in a locked file or a secure section of the College's network storage platform.

15. LENGTH OF TIME RECORDS WILL BE KEPT

All records relating to child sexual abuse, physical abuse, psychological, emotional harm, neglect and/or exploitation that has occurred, or is alleged to have occurred will be retained for forty-five (45) years and if the relevant person is of Indigenous origin or in out-of-home care, retained permanently. This period is to allow for delayed disclosure of abuse by victims and take account of limitation periods for civil actions for child sexual abuse.³⁸

In all cases of inappropriate behaviour, proven or alleged, the College will keep all events until the end of three (3) years after the last date on which the child was educated and cared for by the College.³⁹

16. PUBLICATION

The Board will ensure that this policy is published:

- to staff members generally, at least once a year
- onto the College website
- to each new staff member, on induction

The Principal will ensure that a copy of the policy is always available on the College website. A copy of the Student and Parent Information Leaflets are provided to parent(s)/guardian(s) via the College website and within the parent handbooks.

17. TRAINING AND PROFESSIONAL DEVELOPMENT

The governing body acknowledges its commitment to and will ensure that the College Board, teachers and staff members of the College are trained in Child Safety Services obligations.

All staff members will receive student protection professional development at the beginning of each academic year before commencement of term during the annual professional development week.

New staff members who are employed during the course of the year will receive their student protection training in the staff induction process.

Additionally, each of the sub-school teachers/staff members will receive student protection training conducted by the Student Protection Contact Officers⁴⁰ or the respective schools to address specifics to the different age groups.

Student Protection Contact Officers⁴¹ are required to attend annual student protection professional development conducted by external providers and they are updated regularly via ISQ news updates and the College advisory barrister.

College Board members will receive regular student protection professional development and updates from the barrister or as legislation requires.

18. COMMUNICATION TO STUDENTS

The Student Protection policy is designed to ensure that every student feels safe and secure. The College understands that students learn and understand things differently, so will communicate this policy in various ways to make sure every student can understand it. The College aims to empower students with the knowledge they need to recognise and respond to any situation that might make them feel unsafe.

³⁸ Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report Recommendations 8.1, 8.2, 8.3 and 8.5

³⁹ Australian Society of Archivists, *Records Retention and Disposal Schedule for Non-Government Schools*, 2nd Edition, April 2018

⁴⁰ Annexure K

⁴¹ Annexure K

The College will have processes in place to make sure children with a disability know who they can go to if they feel unsafe or have a concern or complaint - make sure these processes take into account the child's developmental level and communication requirements.

19. REVIEW OF POLICY

This policy will be reviewed annually or as required by legislation.

20. CONTACT INFORMATION

If, on receiving advice from an employee that he/she suspects a student is in need of protection from a situation outside of the immediate Citipointe Christian College environment, the Principal should contact and document the contact with either the:

- Queensland Police Services Child Protection and Investigation Unit, Morningside⁴²
Phone 07 3823 8619 or 07 3364 6430
- Department of Children, Youth Justice and Multicultural Affairs (Child Safety Services)⁴³ Phone: 1800 811 810 (from 9am to 5pm Monday to Friday) or 1800 177 135 (outside office hours) or 1300 682 254 (Regional Office) and
- The Senior Pastor of Citipointe Church Tel: 3343 8888

⁴² <https://www.police.qld.gov.au/units/victims-of-crime/child-protection>

⁴³ <https://www.cyjma.qld.gov.au/protecting-children/reporting-child-abuse>

Annexure A

STUDENT PROTECTION - ACTION SUMMARY

Conduct	Who Must Report	Report to	Action Required	Relevant Legislation
<p>1. Sexual Abuse</p> <p>Awareness, or reasonable suspicion, or likely</p> <p>this may overlap with 2 below</p>	All Staff	<p>MUST REPORT*</p> <p>To the Principal or Delegated Appropriately Qualified Individual (DAQI) immediately.</p> <p>The Principal or DAQI must immediately report to the Police and provide them with a copy of the written report.</p>	<p>MUST REPORT*</p> <p>Provide a copy of the report to the Principal, Governing Body</p> <p>Principal, Governing Body provide NOTIFICATION report to Police. The staff member who makes the report will be listed as the NOTIFIER.</p>	<p>Education (Accreditation of Non-State Schools) Regulation 2017 (Qld), S16</p> <p>Education (General Provisions) Act 2006 (Qld) S366, S366A</p> <p>Criminal Code 1899 (Qld) Schedule 1, Part 4, Chap 22, S229BB, S229BC (The Criminal Code names all adults as mandatory reporters regarding child sexual offences)</p>
<p>2. Reportable Suspicion of Sexual Abuse</p>	All Staff	<p>MUST REPORT*</p> <p>To the Principal or Delegated Appropriately Qualified Individual (DAQI) immediately.</p> <p>The Principal or DAQI must immediately report to the Police and provide them with a copy of the written report.</p>	<p>MUST REPORT*</p> <p>Provide a copy of the report to the Principal, Governing Body</p> <p>Principal, Governing Body provide NOTIFICATION report to Police. The staff member who makes the report will be listed as the NOTIFIER.</p>	<p>Criminal Code 1899 (Qld) S229BC</p> <p>Child Protection Act 1999 (Qld) S13E</p>
<p>3. Reportable Suspicion of Physical Abuse - must fit 2 criteria:</p> <p>a. Significant Harm AND b. Parent may not be able or willing to protect the child</p>	All Staff	<p>MUST REPORT*</p> <p>To the Principal or Delegated Appropriately Qualified Individual (DAQI) immediately.</p> <p>The Principal or DAQI must immediately report to the Police and provide them with a copy of the written report.</p>	<p>MUST REPORT*</p> <p>Provide a copy of the report to the Principal, Governing Body</p> <p>Principal, Governing Body provide NOTIFICATION report to Child Safety Services. The staff member who makes the report will be listed as the NOTIFIER.</p>	<p>Child Protection Act 1999 (Qld) S13E</p>

MUST REPORT*

All reporting will be carried out in consultation with the Principal and/or the delegated Appropriately Qualified Individual. Reporting to the Principal and/or the delegated Appropriately Qualified Individual does not remove the mandatory reporting obligations of the staff member to report allegations under the Child Protection Act 1999 (Qld).

Conduct	Who Must Report	Report to	Action Required	Relevant Legislation
4(a)(b). Harm or Reasonable Suspicion of Harm or Other Concerns	All Staff	MUST REPORT* to Child Protection Contact Officers/HOS and Principal	Principal/Delegate 4(a) NOTIFY Child Safety Services subject to criteria 3a and 3b, OR (b) NOTIFY Police	Education (Accreditation of Non-State Schools) Regulation 2017 (Qld), S16 Child Protection Act 1999 (Qld) S9
4(c) Any Concerns/Harm where parents are supportive / in partnership with the College but DO NOT fit both criteria of 3a & 3b above	All Staff	MUST REPORT* to Child Protection Contact Officers/HOS and Principal	Principal/Delegate 4(c) REFER (with consent) to CBIR...FCC...IFSS	Child Protection Act 1999 (Qld) S9
4(d) Any Concerns/Harm where parents are not supportive / in partnership with the College and DO NOT fit both criteria of 3a & 3b above	All Staff	MUST REPORT* to Child Protection Contact Officers/HOS and Principal	Principal/Delegate 4(d) MAY REFER (without consent) to CBIR...FCC...IFSS	Child Protection Act 1999 (Qld) S9
5. Inappropriate Behaviour (staff and students)	Inappropriate behaviour will continue to be managed internally by the College, via internal investigation and remedy, including by referral of students / families to FCC for support.			

UNDER LEGISLATION THE PATHWAYS FOR REPORTING AND ACTION ARE:

- Mandatory reporting (**IN RED ABOVE**) to Police or Child Safety Services as in 1 and 2 above, sometimes to both, of sexual and/or physical abuse.
- Reporting of harm (that is not sexual or physical), as in 4 (a), (b), (c) and (d) above.
- Referral to support agencies CBIR, FCC or IFSS, as appropriate.
- Dealing with inappropriate behaviour, as in 4 above.

COMMON LAW DUTY OF CARE, THE CONTRACT AND THE BEST INTERESTS OF THE STUDENT OR RELEVANT CHILD WILL ALSO DIRECT YOUR THINKING AND RESPONSES.

Adapted from table prepared by Suzanne Brooks, Barrister
Liability limited by a scheme approved under
Professional Standards Legislation

CBIR REFERS TO – *Community Based Intake & Referral*;
FCC REFERS TO – *Family and Child Connect*;
IFSS REFERS TO – *Intensive Family Support Services*

MUST REPORT*

All reporting will be carried out in consultation with the Principal and/or the delegated Appropriately Qualified Individual. Reporting to the Principal and/or the delegated Appropriately Qualified Individual does not remove the mandatory reporting obligations of the staff member to report allegations under the Child Protection Act 1999 (Qld).



ANNEXURE B

STUDENT PROTECTION FORM 1

For all reporting EXCEPT sexual abuse, known or suspected, by any person
(use Form 3 for sexual abuse, known or suspected)

REFERRAL FORM 1 - TO BE GIVEN TO THE STUDENT PROTECTION CONTACT OFFICER

1. Name of person with reasonable concern _____
2. Name of student and year level _____
3. Name of the alleged offender and their relationship to the student: _____
4. Is the problem: External to the College: Parent Relative
Internal to the College: Teacher Student Other
5. Date and time you became concerned: _____
6. How did you form the reasonable suspicion? _____
7. Details of disclosure by the victim? _____
8. Details of disclosure from somebody else? _____
9. Did you observe something? _____
10. Have you spoken of your concern to anyone? _____
NAME _____
11. Describe the "who, what, when and where" of the matter. (Use extra paper if necessary)
12. To whom did you report the concern first? The Student Protection Contact Officer
The Principal
Another
13. Name of the person referring _____ Role _____
14. Time of actual referral _____ Date _____

A factual written report of the Student Protection concerns must accompany this form.

Confidentiality Declaration

I declare I will respect the requirements of confidentiality in this matter unless as required otherwise by law.

Signature: _____ Date of Reporting _____



ANNEXURE C

STUDENT PROTECTION – FORM 2

For All Reporting - To be Completed by Student Protection Contact Officer and given to Principal.

Today's Date: _____

1. Name of person reporting concern/information: _____
2. Name of Student: _____
3. Name of alleged offender: _____
4. Name of any likely witnesses: _____
5. Name of any others who may have information or who may assist: _____
6. Has Form 1 been completed? Yes No

A factual written report of the Student Protection concerns must accompany this form.

CONFIDENTIALITY DECLARATION

I (Name): _____

Declare I will keep this information confidential.

Signed: _____



ANNEXURE D

STUDENT PROTECTION – FORM 3

**MANDATORY REPORTING FORM FOR REPORTING KNOWN or SUSPECTED
SEXUAL ABUSE TO POLICE**

Reporting of all incidents is **mandatory for staff whether the situation has occurred inside or outside the College.**

This form is to be initiated by the staff member who has become aware of or suspecting of sexual abuse of a relevant person and forwarded to Principal or the Delegated Appropriately Qualified Individual immediately.

Name of Student:			
Gender of Student:		DOB:	
Name of School:		Year Level:	
Name of Parents:		Address and Contact Details:	
		Address and Contact Details:	
Custody Arrangements			

Name of staff member completing this form:			
Role/Position:			
Name of School student attends:		Year Level:	
Date reasonable suspicion formed			
I became aware of this student protection concern because the student involved:			
<input type="checkbox"/> Spoke to me			
<input type="checkbox"/> Spoke to another student	Name of Student:		
<input type="checkbox"/> Spoke to another staff member	Name of Staff Member:		
<input type="checkbox"/> Staff member/other observation	Name of Staff Member:		
<input type="checkbox"/> Other	Details:		

A factual written report of the Student Protection concerns known to the College must accompany this form.

I confirm that the details above are to my belief correct. I will maintain the confidentiality of all persons involved, and expect the information passed on, will be acted upon and resolved in accordance with the College Student Protection Policy.

*Signed by staff member initiating process (and full name) _____

_____ Date

Referred to Principal _____
Signed: by Principal

_____ Date Received

Referred to Appropriately Qualified Individual _____

Signed: Appropriately Qualified Individual

_____ Date Received



ANNEXURE D

STUDENT PROTECTION – FORM 4

MANDATORY REPORTING FORM FOR REPORTABLE SUSPICION – TO CHILD SAFETY SERVICES

Reporting of all incidents is mandatory for staff whether the situation has occurred inside or outside the College.

This form is to be initiated by the staff member who has become aware of or suspecting of sexual abuse of a student and used to make a mandatory report to Child Safety Services. A copy of the form must be forwarded to the Principal or the Delegated Appropriately Qualified Individual.

Does this report concern:	<input type="checkbox"/> Sexual Harm	<input type="checkbox"/> Physical Harm	<input type="checkbox"/> Grooming
	<input type="checkbox"/> Psychological, Emotional Harm Neglect or Exploitation		
Does it pass the significant harm test?	<input type="checkbox"/> Yes.	<input type="checkbox"/> No	
Does it pass the parent test?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Student:			
Gender of Student:		DOB:	
Name of School:		Year Level:	
Name of Parents:		Address and Contact Details:	
		Address and Contact Details:	
Custody Arrangements			

Name of staff member completing this form:			
Role/Position:			
Name of School student attends:		Year Level:	
Date reasonable suspicion formed			
I became aware of this student protection concern because the student involved:			
<input type="checkbox"/> Spoke to me			
<input type="checkbox"/> Spoke to another student	Name of Student:		
<input type="checkbox"/> Spoke to another staff member	Name of Staff Member:		
<input type="checkbox"/> Staff member/other observation	Name of Staff Member:		
<input type="checkbox"/> Other	Details:		

A factual written report of the Student Protection concerns known to the College must accompany this form.



ANNEXURE D

STUDENT PROTECTION – FORM 4
(Continued)

<i>I confirm that the details above are to my belief correct. I will maintain the confidentiality of all persons involved, and expect the information passed on, will be acted upon and resolved in accordance with the College Student Protection Policy.</i>	
*Signed by staff member making the report (and full name) _____	Date _____
The mandatory report was made to Department of Children, Youth Justice and Multicultural Affairs _____	
Date _____	
OFFICE USE ONLY	
Referred to Principal _____	Signed: by Principal _____
	Date Received _____
Referred to Delegated Appropriately Qualified Individual _____	
Signed: Appropriately Qualified Individual Date Received _____	
* IT IS A MANDATORY REQUIREMENT TO PROVIDE THESE DETAILS	



ANNEXURE E

STUDENT PROTECTION – FORM 5

To be completed by the Principal

ACTION AND OUTCOME FORM

Referred to Student Contact Office: Yes No Date:

Referred to Principal: Time: Date:

Referred to: By whom: Date:

Contact with Board chair/delegated Appropriately Qualified Authority and External Protection Advisor?

- | | | |
|--------------|---|--------------------------|
| Assessment - | Harm | <input type="checkbox"/> |
| | Neglect | <input type="checkbox"/> |
| | Grooming | <input type="checkbox"/> |
| | Sexual abuse of student by staff member | <input type="checkbox"/> |
| | Inappropriate Behaviour | <input type="checkbox"/> |

Action Decided:

Who Took Action?

TYPE OF ACTION TAKEN:

- Issue dealt with under another College Policy (e.g.) Bullying
- No Harm or Sexual Abuse - Issue dealt with internally
- Internal Investigation Needed (but no Criminality.)
- Counselling offered to _____ (name)
- Warning / Termination / Expulsion
- Referral to Department of Children, Youth Justice and Multicultural Affairs
- Referral to Police
- Standing Aside / Suspension
- Referral to an Outside Agency
- Pastoral Care set in Place
- Other: (Please State)

Other Comments (if applicable):

Principal's Signature: _____ Date: _____



RECORD OF STUDENT PROTECTION ISSUES

CITIPOINTE CHRISTIAN COLLEGE

RECORD OF STUDENT PROTECTION ISSUES

A Report from the COLLEGE BOARD

For COC/INC National Executive (the Governing Body)

Report from the Principal of the College to

Meeting of Directors (via the College Board) _____

Report under: Criminal Code Act 1899 (Qld), Child Protection Act 1999 (Qld), General Provisions Act 2006 (Qld) and the Accreditation (Non-State Schools) Regulation 2017 (Qld)

Definitions:

'College Board' means the local College Board appointed by the local church Committee of Management under the College Board Charter outlined in the COC Colleges Governance Policies and Procedures Manual.

'Governing Body' means the National Executive of Christian Outreach Centre (COC) trading as International Network of Churches (INC).

1. This report is updated and presented at each College Board meeting for each meeting of the Governing Body (COC/INC National Executive) in response to the requirements of the Child Protection Act, 1999 (Qld), the Education General Provisions Act, 2006 (Qld) and Education (General Provisions) Regulation, 2017 (Qld), the Accreditation (Non-State Schools) Regulation, 2017 (Qld) and the Criminal Code Act, 1899 (Qld). The Acts and Regulations place a number of obligations on directors of the Company.

The Governing Body accepts the legal obligations under the before mentioned legislation. Notably the obligations detailed in Regulations 15 and 16 of the Accreditation (Non-State Schools) Regulation, 2017 (Qld) and Section 229BB and 229BC of the Criminal Code Act 1899 (Qld).

Knowledge of child protection issues and actions taken requires College Board members and members of the Governing Body (in particular) to be familiar with the Child Protection Policy and with the requirements of Regulation 15 and 16 the Accreditation (Non-State Schools) Regulation, 2017(Qld) and Section 229BB and 229BC of the Criminal Code Act 1899 (Qld).

2. RESPONSIBILITIES OF THE COLLEGE BOARD AND THE GOVERNING BODY UNDER THE POLICY AND LEGISLATION

The College Board and the Governing Body:

- will discharge their duties in accordance with Regulation 15 and 16 of the Accreditation (Non-State Schools) Regulation 2017(Qld) and Section 229BB and 229BC of the Criminal Code Act 1899 (Qld);
- will receive regular reports from the Principal at College Board and Governing Body meetings;
- will ensure the College Formal Complaints Policy covers Child Protection complaints;
- may appoint a Delegated Appropriately Qualified Individual to receive and report (to external authorities) any allegations relating to sexual abuse, including likely sexual abuse on behalf of the Governing Body (this relates to the Governing Body ONLY).

3. College Board Members and members of the Governing Body will be proactive to meet their responsibilities by:

- Seeking professional development relevant to the area of Child Protection. This to take place annually or more frequently if required by changes to policy or law.
- Including a review of the Child Protection Policy.
- Receiving annually, a completed and current copy of the Child Protection Checklist.
- Maintaining currency with all updates to legislation and regulations.
- Receiving a report at each College Board and Governing Body meeting which will provide a summary in number form only of reports received by the Principal of the College.

4. DOCUMENTATION

a. REPORTING PERIOD FOR THIS REPORT _____

b. TYPES OF PROTECTION ISSUES RAISED, KNOWN OR REPORTABLE SUSPICION:

- (i) Inappropriate Behaviour (ii) Harm (iii) Neglect
- (iv) Sexual Abuse (v) Grooming

c. Notifications to the Police
(Mandatory Reporting or Otherwise)

d. Referrals to the Dept of Communities
(Mandatory Reporting or Otherwise)

e. Those which required referral to an agency

Signatures:

Principal of College _____ Date _____
(Citipointe Christian College)

Delegated Appropriately Qualified Individual _____ Date _____
(Citipointe Christian College Board)

Chairperson _____ Date _____
(Citipointe Christian College Board)

Chairperson _____ Date _____
(Governing Body COC/INC National Chairperson)



STUDENT PROTECTION

Student Information Leaflet (Secondary)

Every student at the College has the right to feel safe and free from harm. We expect you to respect your teachers and other students and we expect that you will receive the same respect in return. We encourage our students to never allow themselves to feel unsafe without reporting it to someone they trust.

Who should I tell if I am not feeling safe at the College or at home?

There are delegated Student Protection Contact Officers. However, you may report to any staff. If you do not feel like talking to a member of staff, you may like to write him or her a letter.

What will happen if I report what is happening to a member of staff?

If the concern is worrying you but not causing you immediate harm, then the member of staff will discuss with you ways to solve your problem. If the concern is serious and the member of staff believes there is inappropriate behaviour or you are being harmed or in danger of being harmed, he or she will report it to the Contact Officer or Principal.

What if I do not want the member of staff to tell the Principal?

The member of staff will try to keep your concerns confidential as much as possible. However, if the member of staff is aware or reasonably suspects inappropriate behaviour or harm being caused to a student of the College, then College Policy and the law says that the matter must be reported to the Principal, the Police and/or Child Safety Services. If the staff member has no choice about reporting what you have told them to someone else, he or she will explain to you exactly what will happen next.

Remember, the most important thing is that you feel safe and free from harm. You need to tell or email a staff member if you are being harmed or afraid that you will be harmed.

Student Information Leaflet (Upper Primary)



Citipointe Christian College

Student Protection Policy

We have this policy to keep children safe and secure at school. It helps our community understand their responsibility to Child Safety.

We will support families in the care and education of their children, within our College and our wider community, by providing a safe and supportive learning environment for all students. Our College is committed to Student Safety. Staff, volunteers, students and their families work together to keep students safe from harm.

What our College believes

The College has a responsibility to create nurturing school environments where everyone is respected, their voices are heard and they are safe and feel safe. We are all created by God in His image. God loves us and wants us to be safe. God only wants the best for us.

All students attending our College have the right to feel and be safe. Our College works in partnership with families and our community. We must have honest, respectful and trusting relationships between adults and children at our College.

What our College promises to do

Our College teaches students skills to understand and maintain their personal safety and wellbeing. Our College will communicate honestly and openly with parents and carers about the wellbeing and safety of their children. Our College will listen to the views of staff, children and our community about our student safety practice, policies and procedures. We will listen to all concerns voiced about keeping students safe from harm.

What our Staff promise to do

All adults in our College have a responsibility to care for children, to promote wellbeing and keep them safe. Our College has a Code of Conduct for all adults. It states the expectations for adults at working, volunteering or visiting our school. Staff have regular training to make sure they understand the Government requirements for Student Safety.



Reporting and responding

Our College respects student's views and their privacy.

If a child has a concern and reports this to a staff member they will take it seriously and take appropriate action. All staff know how to respond to student safety issues. If you feel unsafe you could speak to the Primary Student Protection Contact Officers or any staff. The Student Protection Contact Officers also provide advice to all the primary staff on Student safety.

If staff think a student may have been unsafe, is unsafe or will be unsafe in the future they will always report it to Mrs Piercey, Mrs Gravestein or one of the Student Protection Contact Officers. Sometimes they might even report it to the Police. Staff won't tell everyone about the problem, just the people they have to tell. This is called keeping things confidential.

Primary Student Protection Contact Officers



Mrs Varghese



Mrs O'Sullivan



Mr Smith



Mrs Grobbelaar

Remember, if you ever feel unsafe tell your teacher or any staff member at the College. We will help you.

STUDENT PROTECTION

Student Information Leaflet (Lower Primary)



Citipointe Christian College

Student Protection Policy

We have this policy to keep children safe and secure at school. It helps our community understand their responsibility to Child Safety.

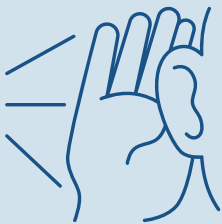
Our College is a safe place for students to learn and have fun. We want to make sure everyone is safe at our College. We have rules to keep students safe, and we all work together to follow them. Teachers, volunteers, students and their families work together to keep children safe from harm.

We believe that every student has the right to feel safe and be happy. We also believe that everyone should treat each other with respect and kindness.



We are all created by God in His image. God loves us and wants us to be safe. God only wants the best for us.

Our teachers are trained to help students learn how to be safe and take care of themselves. They will always listen if a student needs help and take action to make things better.



Miss Grobbelaar



Mr Smith



Mrs O'Sullivan



Mrs Varghese

We have some special teachers at the College who you can talk to if you don't feel safe.

If you ever feel scared or uncomfortable, you can talk to any teacher at the College. They will listen to you and help you and make sure you are safe.



ANNEXURE H

STUDENT PROTECTION PARENT INFORMATION LEAFLET

STUDENT PROTECTION INFORMATION

The College recognises that protecting students from harm, sexual abuse, grooming, neglect and inappropriate behaviour is fundamental to maximising their potential. For this reason, the welfare and best interests of the students within our College will always be a primary consideration. We expect our students to show respect to our staff and volunteers and to comply with safe practices, and we expect all employees to ensure that their behaviour towards and relationships with students reflect proper standards of care for students, and are not unprofessional or unlawful. The College will respond diligently to a report of suspected or actual harm, or risk of harm to a student. It is the intent of the College to provide the students with a safe learning environment within the College grounds and during College related activities. However, any activities outside of College hours and scope of activities will be the responsibility and care of the individual. The College will not have the capacity to provide the extended duty of care outside of College activities.

What does the College mean by harm? (defined under section 9 of Child Protection Act 1999)

Harm 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:

- A single act, omission or circumstance; or
- A series or combination of acts, omissions or circumstances.
- Physical, psychological or emotional abuse or neglect;
- Sexual abuse or exploitation.

How does the College protect students from harm?

The College has a comprehensive Student Protection Policy. This covers the actions to be taken if a member of staff or a parent of the College becomes aware of, or reasonably suspects that a student has been harmed by other staff, people outside the College or by other students.

What to do if you become aware or reasonably suspect that harm has been caused to a student of the College by a member of staff, someone outside of the College or by other students.

You are encouraged to report your concerns to a Student Protection Contact Officer or Principal or to any other member of the teaching staff.

What will happen next?

If you report your concerns to a member of staff other than the Principal, the member of staff will report it to the Principal immediately. Or if the subject of the complaint is the Principal then the member of staff will report to the Appropriately Qualified Individual or a Student Protection Contact Officer.

What will the Principal or Appropriately Qualified Individual do?

If the Principal or Appropriately Qualified Individual receives a report of harm or suspected harm to a student of the College; and he/she becomes aware of the harm/sexual abuse having been caused or reasonably suspects the harm to have been caused then it will be reported to the relevant State

Authorities handling child protection issues. Or it may be dealt with internally if the matter does not require mandatory reporting to an outside body.

What about confidentiality?

Your report will be treated in a confidential manner and with respect. Knowledge of it will be limited to the Principal and those directly involved. The Chairman of the College Board may also need to be informed. It is the College's policy that confidentiality between the College and notifiers will be respected as much as possible and any concerns raised will not rebound adversely on their children.

Each person who has access to information regarding suspected or disclosed harm has an obligation to observe appropriate confidentiality. However, the College is unable to promise absolute confidentiality since the steps of the Policy will require disclosing, internally and externally, certain details involved in responding to the report. State Authorities can compel people to give evidence about actions under the Policy and to produce documents. You would be fully informed if information you provided were to be passed on to a third party.

Any action which needed to be taken under staff disciplinary procedures as a result of an allegation not requiring police intervention would be handled confidentially within the College.

How will the College help my child?

The Principal will ensure that the following things are done to reduce the chance of harm occurring:

- Ensure that each staff member understands and fulfils their obligations under this Policy and the Policy for reporting abuse;
- Ensure that there are acceptable references for each staff member engaged since the commencement of this protocol, from his or her previous employers;
- Ensure that each staff member and volunteer who has contact with children has a current "Positive Notice Blue Card" or an "Exemption Card" issued by the Commissioner for Children and Young People;
- Ensure the students of the College understand the policy is in place and are encouraged to report any inappropriate behaviours;

If the Principal receives a report of harm to your child, he/she will support the child by:

- Responding rapidly and diligently to the report;
- Reassuring the student;
- Protecting the child's confidentiality as much as possible;
- Offering continuous support; and
- Arranging counselling if requested/required
- May refer the matter to Family and Child Support Services (FCC), Community Based Intake and Referral Services (CBIR) or the Intensive Family Support Services (IFSS)

What should I do if I require more information?

The College's complete Student Protection Policy is available at the College administration. Parents and students may have access to this policy at any time.

What do I do if I wish to make an allegation of non-compliance with the College's stated reporting processes?

If you have an allegation of non-compliance, please refer to the Grievance and Disputes policy which is located on the College website.



ANNEXURE I

Student Protection Record

Where State Authorities Interview Child at the College

Record of interview with students for whom there are student protection interviews conducted by Department of Children, Youth Justice and Multicultural Affairs and/or Queensland Police Service, at the College.			
This form is to be completed by the Principal (or delegate) and retained confidentially at College level. File the form in a secure location with other student protection documentation.			
1. Student interviewed:			DOB:
2. Date of request:			
3. Time period within which contact is required	<input type="checkbox"/> Immediate / today	<input type="checkbox"/> < 5 days	<input type="checkbox"/> 5 days – 14 days
4. Agency/Agencies intending to interview student	<input type="checkbox"/> Department of Children, Youth Justice and Multicultural Affairs <input type="checkbox"/> Queensland Police Service		
5. Officers who are requesting to interview student	Name	Position	Agency (QPS or DOCYJMA)
7. Parent Notice	Please tick <input type="checkbox"/> relevant boxes (below) <u>after</u> obtaining information from DOCYJMA or QPS about the legal requirements under the Child Protection Act 1999 (Qld) and the Criminal Code 1899 (Qld).		
	<input type="checkbox"/> It is in the child's best interests that the officer has contact with the child <u>before</u> the child's parents are told about the investigation and/or <input type="checkbox"/> The child's parents knowing in advance about the proposed interview with the child is likely to adversely affect or otherwise prevent the proper conduct of the investigation. <hr/> <input type="checkbox"/> Department of Children, Youth Justice and Multicultural Affairs <input type="checkbox"/> Queensland Police Service <input type="checkbox"/> Will, as soon as practicable <u>after</u> the officer has had contact with the student, tell at least one (1) of the student's parents that the officer has had contact with the student and the reasons for the contact.		
	NB. The College is not to inform parents of interviews unless requested to do so by Child Safety Services or the Police. The College retains the right to deny requests to inform parents of interviews conducted by Child Safety Services or the Police.		
College support person	Did the College provide the student with a support person during the interview? <input type="checkbox"/> Yes Name of Support Person: _____ Did the State Authority provide support? <input type="checkbox"/> Yes Name of Support Person: _____ <input type="checkbox"/> No		

Signature of Principal: _____ Date: _____
(Delegate)

Student Protection Policy Contact Details for Reporting

7.1.1 Student Protection Policy Reporting Contact Details Contact details for reporting within this Board and College Policy 7.1	Last Review and Approved	20/02/2023
	Next Review Due	2024

Principal: Mrs Ruth Gravestain, Citipointe Christian College, 322 Wecker Road, Carindale Qld 4152. Phone 07 3555 2700.

Delegated Appropriately Qualified Individual: Romy Fulljames, 138 Juliette St, Greenslopes. Phone 0422 225 484

Independent Protection Advisor: Ps Michael Mulheran, Phone 3343 8888

Student Protection Contact Officers for the College are:

- Whole College - Ronelle Grobbelaar
- Primary – Anna Varghese, Toni O’Sullivan, and Daniel Smith
- Secondary –Mrs Lana van den Berg
- International – Nadia Janse van Rensburg

Citipointe Christian College, 322 Wecker Road Carindale Qld 4152. Phone 07 3555 2700.

Governing Body: Mrs Suellen Holmes, Secretary, 56 Caloola Drive, Tweed Heads NSW 2485. Phone 07 5506 5100.

Queensland Police Services Child Protection and Investigation Unit, Morningside Phone 07 3823 8619 or 07 3364 6430 - <https://www.police.qld.gov.au/units/victims-of-crime/child-protection>

Department of Children, Youth Justice and Multicultural Affairs (Child Safety Services)

Phone: 1800 811 810 (from 9am to 5pm Monday to Friday) or

1800 177 135 (outside office hours) or

1300 682 254 (Regional Office)

<https://www.cyjma.qld.gov.au/protecting-children/reporting-child-abuse>







ANNEXURE K



STUDENT PROTECTION CONTACT OFFICERS

Every student at Citipointe Christian College has the right to feel safe and free from harm. You need to tell somebody if you, or another student, are being harmed or are afraid of being harmed from somebody at home, at school, or in the community. If you or others are feeling unsafe, it is very important that you tell somebody immediately.

The staff members pictured below are specifically delegated Student Protection Contact Officers available to help you whenever you need to discuss a concern. You may also talk with the Principal, your Head of School, your Head of Year or any teacher.

					
<p>Miss Ronelle Grobbelaar Student Services Coordinator</p>	<p>Mrs Toni O'Sullivan Head of Primary Pastoral Care</p>	<p>Mrs Anna Varghese Head of Student Support</p>	<p>Mr Daniel Smith Director of Primary Administration</p>	<p>Mrs Lana van den Berg Director of Student Care Secondary</p>	<p>Nadia Janse van Rensburg Student Counsellor Citipointe Christian College International</p>

GENERAL INFORMATION

PROTECTION FOR NOTIFIERS

- a) The Child Protection Act 1999 provides for the confidentiality of information supplied by the person making a notification.
- b) Also the Child Protection Act 1999 (Qld) Chapter 6, Part 7, Section 197A states a person, who, in good faith, acting honestly and reasonably, discloses information about suspected harm to a child, to a police officer or the Department of Child Safety, Youth and Women is not liable civilly, criminally or under an administrative process for making the disclosure. It states that merely because the person gives the notification or information, the person cannot be held to have breached any code of professional etiquette or ethics, or departed from accepted standards of professional conduct.

In accordance with this Act the College will protect the identity of the notifier of information, in accordance with College's Board Policy 11.9 Reporter Protection Policy, unless required otherwise by Law.

ROLE OF CHILD PROTECTION AGENCIES AND FAMILY AND CHILD SUPPORT SERVICES

As part of the coordinated interdepartmental approach to child abuse, officers of the Queensland Police Service and the Department of Children, Youth Justice and Multicultural Affairs (Child Safety Services) are responsible for investigating and assessing any report of suspected harm or neglect from any source and to ensure the wellbeing and safety of the child.

It may arise that the person making the complaint or harmed by the behaviours (or parents) do not want to take the matter further. In circumstances of criminality or where the College assesses it appropriate, the matter will be taken further, irrespective of wishes to the contrary.

Referrals may be made by the College to Family and Child Support Services.

ANONYMOUS COMPLAINTS

Such complaints by their very nature provide difficulties, however the College will investigate the validity of each one to the extent possible.

EVIDENCE

The investigation of situations of harm is a complex and sensitive process. In the course of an investigation, officers from the child protection agencies may request permission to interview the student concerned. In most cases, in order to ensure the interests of the child are protected, the student may be interviewed before the matter is discussed with the parent/caregiver.

The responsibility for informing parents/caregivers of notifications and any interviews rests with the investigating child protection agency officers, not with the Principal. For this reason, any person making an inquiry or complaint concerning an investigation or an interview must be promptly referred to the Principal who will refer the enquirer to the appropriate department, with the explanation that it is the responsibility of that department to answer such enquiries or complaints.

POLICE INVESTIGATION

After the police have commenced investigations, and contacted the person against whom the allegations are made, the Principal may provide/arrange support and/or counselling for the person concerned, and the student/s and other employees affected by the situation.

Citipointe Christian College personnel should cooperate with the police in conducting their investigations. The aim of the College and the police is to respond quickly, efficiently and sensitively to establish the facts of the matter and effect its resolution.

Following an investigation, the Principal should also transmit the outcomes of any police actions to the Chairman of the Citipointe Christian College Board and the Senior Pastor of Citipointe Church.

SUGGESTED COLLEGE MANAGEMENT APPROACHES AND STRATEGIES TO ENSURE CHILD PROTECTION

Reporting of a criminal offence has no statute of limitations.

It is advisable that the College:

- (a) Monitors the teaching and learning environment to ensure that the behaviour of students, employees and others who work at the College supports its aims and employment policies.
- (b) Provide ongoing opportunities for employees to develop skills and understanding in how to protect students in their care.
- (c) Ensure that staff have access to, and are informed of, resources available to assist them such as training, advice and relevant literature.
- (d) Support the implementation at the classroom level of all protection programs and harm prevention curriculum which may be developed and ensure that students, while at Citipointe Christian College, are provided with an environment in which they can feel and be safe.
- (e) Organise and conduct professional development on personal safety for Citipointe Christian College personnel in order to avoid potentially compromising situations.
- (f) Arrange counselling and reallocate duties, if required.
- (g) Disseminate information to the total educational community and workplace that these behaviours will not be tolerated under any circumstances.
- (h) Monitor Citipointe Christian College to ensure that high standards of behaviour are maintained and the desired behaviours modelled by adults.
- (i) Publicise procedures for resolving complaints to all employees, students and voluntary workers.
- (j) Develop an awareness and professional expertise in the area.
- (k) Take immediate action on complaints of this nature, in accordance with the procedures set out in this document.
- (l) Make it clear that victimisation of students making a complaint will not be tolerated.
- (m) Respond supportively to any student who makes a complaint of harassment.
- (n) Arrange appropriate in-servicing of employees, students and others.