Child & Youth Risk Management Strategy 2024 (JPC ECS)

Annual Strategy

Working with Children (Risk Management and Screening) Act 2000 ss. 171 – 172
Working with Children (Risk Management and Screening) Regulation 2011 s. 3

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Endorsed by John Paul College Board of Directors Chairperson Name : Dominic Taylor Date: 21 March 2024	**Contact Officer:** Name: Lindsay McQuattie Position: Deputy Principal/Head of Primary

Introduction

John Paul College is a Christian, ecumenical, co-educational College. Our values are based on a Christian ethos and particularly emphasise the principles of Mutual Respect, Integrity, Compassion and Excellence. As a College, we retain a 'duty of care' for our children and students, and as such take steps to look after their wellbeing.

The Education and Care Services (ECS) at John Paul College (JPC) is comprised of three services:
- Early Learning Centre (ELC);
- Kindergarten; and
- Outside School Hours Care (OSHC).

This Child and Youth Risk Management Strategy for ECS covers all of the above services and has regard to the national principles for child safe organisations in accordance with the mapping details in Diagram 1.

Safe service environments don't just happen: they require ongoing planning, commitment and maintenance. The Blue Card system aims to create safe and supportive service environments where children and young people can receive services and participate in activities essential to their development and wellbeing. The Blue Card system has 3 key components:
- Risk management strategies
- Blue Card screening
- Compliance and ongoing monitoring.

The *Working with Children (Risk Management and Screening) Act* 2000 (the Act) and the *Working with Children (Risk Management and Screening) Regulation* 2011 requires organisations regulated by the blue card system to develop, implement and review annually a Child and Youth Risk Management strategy.

The purpose of a Child and Youth Risk Management strategy is to help to identify potential risks of harm to children and young people and to implement strategies to minimise these risks.

A well-developed strategy will help **John Paul College Education and Care Services** achieve its objectives by providing a clear and consistent framework to guide and support children and young people, parents, employees, volunteers and visitors to their service.
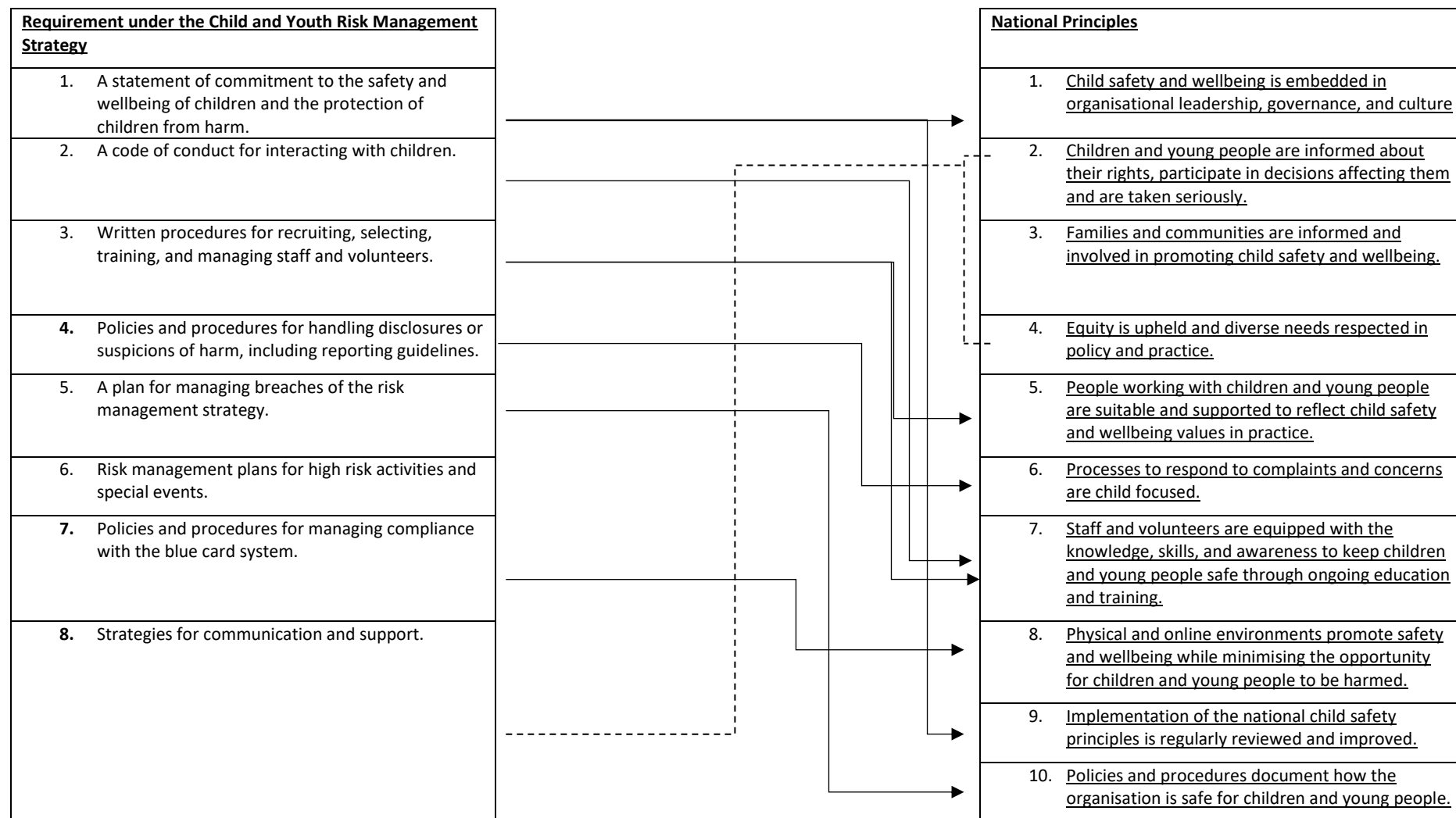
In order to comply with the legislative framework, John Paul College has established a Child and Youth Risk Management Committee (Management Committee). This committee chaired by the Deputy Principal (Culture and Compliance) consists of relevant staff members with representation from across the College including, the Boarding Village, International College and our three (3) Education and Care Services (Early Learning, Kindergarten and Outside School Hours Care).

In order to comply with the legislative framework, a Child and Youth Risk Management strategy must address eight (8) minimum requirements. These requirements:
- address an organisation's **commitment** to creating a safe and supportive service environment
- strengthen an organisation's **capability** to provide such an environment
- assist an organisation to manage any particular **concerns** with respect to the safety and wellbeing of children and young people who are involved with the organisation, and
- promote the **consistency** of an organisation's approach to risk management, both within the organisation and with respect to compliance with the requirements under the Act.

The eight requirements, set out below have been mapped to the National Principles for Child Safe Organisations:

Diagram 1:

Requirement under the Child and Youth Risk Management Strategy	National Principles
1. A statement of commitment to the safety and wellbeing of children and the protection of children from harm.	1. Child safety and wellbeing is embedded in organisational leadership, governance, and culture
2. A code of conduct for interacting with children.	2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
3. Written procedures for recruiting, selecting, training, and managing staff and volunteers.	3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines.	4. Equity is upheld and diverse needs respected in policy and practice.
5. A plan for managing breaches of the risk management strategy.	5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Risk management plans for high risk activities and special events.	6. Processes to respond to complaints and concerns are child focused.
7. Policies and procedures for managing compliance with the blue card system.	7. Staff and volunteers are equipped with the knowledge, skills, and awareness to keep children and young people safe through ongoing education and training.
8. Strategies for communication and support.	8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
	9. Implementation of the national child safety principles is regularly reviewed and improved.
	10. Policies and procedures document how the organisation is safe for children and young people.

Introduction

The JPC CYRM Committee is accountable for ensuring that the John Paul College Child and Youth Risk Management strategy is developed, implemented and reviewed annually.

The strategy is to be reviewed at the completion of each calendar year with the results to inform the development of the new strategy document. The new strategy is to be approved in accordance with the College's governance requirements for implementation for the subsequent school year.

Abbreviations

CYRMS   **Child and Youth Risk Management Strategy**

JPC   **John Paul College**

ECS   **Education and Care Services**

ELC   **Early Learning Centre**

OSHC   **Outside School Hours Care**

ACECQA   **Australian Children's Education and Care Quality Authority**

QCOT   **Queensland College of Teachers**

ECA   **Early Childhood Australia**

Part 1: COMMITMENT

Child and Youth Risk Management Strategy

1. **Statement of Commitment**

Action/s	Reference	Responsible Officer	Evidence

JPC Education and Care Services have adopted the clear Statement of Commitment of JPC which highlights and supports the Services' ongoing commitment to the welfare and wellbeing of children and students.
 	
This statement is well communicated across the ECSs to staff, contractors, volunteers, children, students and parents and is referenced in key policies and procedures.
 	
Communication and dissemination of this statement is the responsibility of the Approved Provider Delegates with the lead assumed by the Heads of each of the Services.
 	
Statement of Commitment
Protection of Children and Young People
John Paul College supports the rights of children and is committed to ensure the safety, welfare and wellbeing of students. John Paul College is therefore committed to responding to allegations of student harm resulting from the conduct or actions of any person including that of employees.
This commitment includes the provision of a safe and supportive living and learning environment for all students and requires all employees, volunteers and visitors to model
	Relevant legislation
	Working with Children (Risk Management and Screening) Act 2000 (ss. 171 – 172)
	
	Working with Children (Risk Management and Screening) Regulation 2011 (s. 3)
	
	Child Protection policies and procedures of the ECS (OSHC, Kindergarten and ELC)
		Approved Provider (Board of Directors)
		
		Approved Provider Delegates
		
		Nominated Supervisors (if not the same):
		
		• Head of Early Education
		• Head of Outside School Hours Care
		
		Deputy Principal/Head of Primary (Operational Supervisor)
			• John Paul College Statement of Commitment to the Safety and Wellbeing of Children and the Protection of Children from Harm utilised by ECSs.
			• **ECS Child Protection Policy and Procedures.** These are physically made available in the
			  • **ELC/Kindergarten/OSHC** Staffroom
			  • **ELC/Kindergarten/OSHC** Reception
			  • **ELC/Kindergarten/OSHC** Office
			
			Statement of Commitment's visible placement:
			• Foyer / Administration areas of OSHC, ELC and Kindergarten.
			• Parent Handbooks, ECS Specific Induction Employment Packs and Staff Handbook.
			• Statement of Commitment is on JPC parent and student protection intranet sites

and encourage behaviour that upholds the dignity and protection of students from harm. *In support of this commitment, John Paul College (which includes its respective Education and Care Services) is dedicated to its Child and Youth Risk Management strategy which includes having relevant policies, procedures and training in place to effectively address the safety and wellbeing of students in our care.*			

Part 1: COMMITMENT

Child and Youth Risk Management Strategy

2. Code of Conduct

Action/s	Reference	Responsible Officer	Evidence
The Education and Care Services at John Paul College has in place Policies and Procedures relating to the "Code of Conduct" for all key stakeholders – employees, children, students, parents, visitors, contractors and volunteers. The John Paul College Strategic Intent (of which the ECS is a part) – Towards 2022 and Strategic Plans (2023) outline the values of the College, which underpin all that we do and who we are as a College and ECS: ❖ Mutual Respect ❖ Excellence ❖ Compassion ❖ Integrity The Cultural Statement along with our Statement of Commitment to Protection of Children and Young People demonstrate our ongoing commitment to the safety and wellbeing of students. John Paul College ECS has in place several Community Codes of Conduct relating to various roles within the College. These codes highlight behavioural expectations with respect to the interactions with students. All employees, volunteers, parents and students must comply with the respective Code of	**College Codes of Conduct** • College Community Code of Conduct – Board Members • College Community Code of Conduct – Staff Members • College Community Code of Conduct • Our College Values and Expectations (Students in OSHC and Kindergarten) **ECS Policies and Procedures** ELC/Kindergarten - Staff Professionalism and Ethics Policy ELC/Kindergarten - Relationships with Children Policy OSHC- Respect for Children Policy OSHC - Employee Professional Conduct and Proactive Practices Policy OSHC - Parent Conduct Policy ELC/Kindergarten - Volunteers Policy OSHC Volunteer Policy Displayed Codes of Ethics within Services: ELC/Kindergarten and OSHC provide paper copies at employment and reinduction each year **Early Childhood Australia Code of Ethics**	Approved Provider (Board of Directors) Approved Provider Delegate Nominated Supervisors: • Head of Early Education • Head of Outside School Hours Care Deputy Principal/Head of Primary (Operational Supervisor)	**Within the JPC Policy and Procedures Documents:** (see reference section for Codes of Conduct) **ECS Policies and Procedures** (see reference section) **Induction and re-induction** College Framework- As part of the deployment of the systemised onboarding and performance and learning management system staff are required at induction and annually thereafter to electronically acknowledge and agree to the JPC Staff Code of Conduct and related staff handbook/policies. ELC/Kindergarten – An annual re-induction checklist is completed by staff each year to indicate their understanding of the policies and procedures of the service, e.g. professionalism, engagement with children, working with children requirements, and codes of ethics. OSHC – Annual reinduction undertaken at the beginning of the year for continuing staff to sign and acknowledge the service specific policies and procedures. **Documents are available and/or referred to:** • ELC / Kindergarten and OSHC Staff Handbooks/Manuals • ELC / Kindergarten and OSHC Parent Information Handbooks • OSHC Volunteer Handbooks

| Conduct/s and relevant policies. In addition, professional staff **must** adhere to their respective Codes of Ethics and/or Standards.

A code of conduct outlines expected standards of behaviour for all stakeholders interacting with children within OSHC, ELC and Kindergarten.

Stakeholders:
    • Children
    • Employees
    • Volunteers
    • Consultants and Contractors
    • Board members
    • Pre-service teachers
    • Visiting researchers
    • Work experience and vocational education students
    • Visitors
    • Volunteers
    • Spectators | **QCOT: Code of Ethics for Teachers in Queensland**

QCOT: Professional Standards for Queensland Teachers

ACECQA National Quality Framework

Education and Care Services National Law Act 2011

Education and Care Services National Regulations | | Updates to the Code of Conduct for staff include mention of responsible consumption of alcohol and restrictions regarding smoking and vaping.

A College 'Professional Boundaries' policy has been published with training for staff planned for PD sessions. |
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Part 2: CAPABILITY

Child and Youth Risk Management Strategy

3. Written processes for recruitment, selection, training and managing staff and volunteers.

Action/s	Reference	Responsible Officer	Evidence
The John Paul College ECS has child-focused policies and procedures in place for recruitment and selecting, training, managing paid employees and volunteers. Student/Child Protection Training covers legislative and policy obligations and supports the identification and reporting of abuse, harm, and inappropriate behaviour towards a student/child. Staff are reminded to wear name badges on site, During training staff are advised to ensure that only permitted adults are on campus. We have systems in place for pre-employment, post-employment, performance and learning management. Effective recruitment, selection, training and management strategies will: - Attract suitable paid and volunteer applicants and deter unsuitable or unqualified applicants. - Ensure appropriate screening is made for potential new staff and volunteers including Blue Card and Referee checks. - Include relevant interview/selection criteria. - Provide thorough induction processes to ensure staff and volunteers understand safe	**John Paul College Policies that are adopted for use in the ECS.** - John Paul College Working with Children Policy and Procedure - Recruitment and Selection Policy - Volunteer Management Policy and Procedure - Anti-Discrimination Policy - Equal Employment Opportunity Policy - Privacy Policy - Staff Training and Professional Development **ECS Policies** - ELC/Kindergarten Staffing Policy (Roles and Responsibilities, Responsible Person on Duty, induction and orientation and safe practices) - OSHC - Employee Performance Monitoring / Review and Management Policy - OSHC - Employee Orientation and Induction Policy	Approved Provider (Board of Directors) Approved Provider Delegate Nominated Supervisors: - Head of Early Education (Kindergarten) - Head of Outside School Hours Care Deputy Principal (Head of Primary School) (Operational Supervisor) Director of Human Resources Deputy Principal (Culture and Compliance) Compliance Officer (Blue Card Co-ordinator) Blue Card Organisational Representatives	**Recruitment and selection – JPC Interview Record** Relevant policies current and available on the College intranet for staff. In addition: - All potential staff interviews include student protection scenario type questions relative to the position being applied for; - Rigorous (minimum two) referee checks undertaken. **Working with Children / Compliance with College Policies and Procedure / Student Protection information contained in:** - Employment agreement - Interview questions template - Position descriptions Annual online child protection (identification and mandatory reporting) training is delivered for completion by all staff at commencement of Term One each year. Child / Student protection training covers College/ECS policies and reporting procedures. ECS specific third party facilitated child protection training is also completed annually by Encompass Family and Community and Insafe Hands (Qualified experienced child protection experts) as appropriate to the age of the students (e.g. ELC and Kindy). Mandatory training includes:

and productive approaches and are made aware of guiding policies and procedures. • Signing of Induction Checklist for new staff and volunteers. Long term sign annually. • Ensure staff and volunteers maintain a safe and supportive environment for children through accountability and training. • Provide an appropriate appraisal process. • Ensure that any issues with staff performance or conduct are identified and appropriately addressed in a timely manner.			• Sexual abuse/ likely sexual abuse of children/students • Harm / risk of harm caused by physical abuse, sexual abuse, emotional abuse or neglect: and • Suspected harm, Inappropriate and other concerning behaviour reporting. **Induction and training (mandatory)** Student and Child Protection training is recorded within ELMO (the College's systemised onboarding, performance and learning management system). During the intervening period until external professional development courses are captured within ELMO, records will be maintained by the relevant Head of Service and made available to the Director of Human Resources. The Heads of the relevant Services manage the back capture of staff who miss any mandatory training and ensure for any new staff child protection training is undertaken within 30 days of commencement. At the Service level, new staff are required to sign off by email, that they have read and understood key compliance policies, including the ECS Child Protection Policy and Code of Conduct. The training provides staff with strong skills to effectively respond to and report suspicions or allegations as required by law. External parties are invited to speak to students and staff on specialist child protection subjects, e.g. Bravehearts for OSHC and puppet show for ELC/Kindergarten Services.

			Volunteers and Visitors (including Incursion presenters and allied health professionals): All volunteers and visitors are required to sign in and out of the service (ELC, Kindergarten and OSHC). NOTE: Visitors to the Service are required to be accompanied by a staff member always and are never left with students unattended. For maintenance works, contractors are also required to sign in and out and remain supervised at all times while children are at the service being cared for. All volunteers receive an induction into the ECS and child/student protection training (whether online or face to face). This is in accordance with the College's Volunteer Management Policy. Volunteers are required to re-register, receive management endorsement, and be re-trained and screened under the Working with Children Risk Management and Screening Act 2000, annually. Face to face training (complemented by online modules) has been made available to prospective volunteers.

Part 3: CONCERNS

Child and Youth Risk Management Strategy

4. Policies and procedures for handling disclosures or suspicions of harm including reporting guidelines

Action/s	Reference	Responsible Officer	Evidence
Children can only be protected from harm if it is recognised, responded to and reported. The ECS services must have policies and procedures in place to ensure staff and volunteers respond as quickly as possible to a disclosure or suspicion of harm. A lack of formal policies and procedures can impede the reporting of such matters. The ECS's child protection processes provide a process for all staff to recognise, respond and report allegations or suspicions of: • sexual abuse/likely sexual abuse of students; • harm or risk of harm to children /young people caused by physical abuse, sexual abuse, emotional abuse or neglect; and • inappropriate behaviour of staff, visitors or volunteers to children. All staff receive training and professional development in relation to the child protection policy and procedure annually.	**RELEVANT LEGISLATION** *Child Protection Act* 1999 *Working with Children (Risk Management and Screening) Act* 2000 *Education and Care Services National Law (Queensland)* • s. 162A Persons in day-to-day charge and nominated supervisors to have child protection training https://www.legislation.qld.gov.au/view/html/inforce/current/act-2013-ecsnlq#sec.162A • s. 166 Offence to use inappropriate discipline https://www.legislation.qld.gov.au/view/html/inforce/current/act-2013-ecsnlq#sec.166 • s. 167 Offence relating to protection of children from harm and hazards (harm is as defined by CPA) https://www.legislation.qld.gov.au/view/html/inforce/current/act-2013-ecsnlq#sec.167 • s. 170 Offence relating to unauthorised persons on education and care service premises [see the definition of authorised person in s 170 (5) (a)	Approved Provider (Board of Directors) Approved Provider Delegate Nominated Supervisors: • Head of Early Education • Head of Outside School Hours Care Deputy Principal/Head of Primary (Operational Supervisor) Educators/Teachers	All employees, volunteers and visitors will respond as outlined in The John Paul College (Education and Care Service) Child Protection Policy and associated reporting workflow. The respective procedures in place for handling disclosures or suspicions of harm, including reporting guidelines. The current Child Protection Policy and Procedures documents above are available in the reception areas, staffroom and administration offices of the ECS. Child Protection Policies and Procedures will be reviewed for effectiveness after each reported incident and amended if required. Annual Child Protection Training (All Staff) – Training registers maintained via ELMO and until such time as external training is configured into the ELMO system, within registers / staff files maintained by the Head of the relevant Service. Education event / information records are also maintained by Nominated Supervisors to record all child protection events and curriculum pieces provided to students/ children and parents including literature and presentations by third parties such as Bravehearts.

	https://www.legislation.qld.gov.au/view/html/inforce/current/act-2013-ecsnlq#sec.170		OSHC Safe Place Board (2020/2021) introduced for students and parents to share information about Child Protection. This is a student friendly board addressing where to go for help and SPO summary. It also encourages children to talk with their Educators.

- s.174 Offence to fail to notify certain information to Regulatory Authority [ss (2) and (4)
  https://www.legislation.qld.gov.au/view/html/inforce/current/act-2013-ecsnlq#sec.174

Education and Care Services National Regulations
- s. 12 Meaning of serious incident
  https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2011-ecsnr#sec.12

- s. 84 Awareness of child protection law
  https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2011-ecsnr#sec.84

- s. 155 Interactions with children
  https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2011-ecsnr#sec.155

- s. 168 ECS must have policies and procedures
  https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2011-ecsnr#sec.168

- s. 170 Policies and procedures to be followed
  https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2011-ecsnr#sec.170

- s. 171 Policies and procedures to be kept available
  https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2011-ecsnr#sec.171

- s. 175 Prescribed information to be notified to Regulatory Authority [ss (2) (d) and (e)

Child Protection Week – acknowledgement through special events and activities to raise awareness.

Links in Staff Portal – relating to Child Protection:
- Department of Child Safety, Women and Youth: https://www.csyw.qld.gov.au/child-family/protecting-children/reporting-child-abuse
- National Quality Agenda IT System (NQAITS): https://www.acecqa.gov.au/resources/national-quality-agenda-it-system
- Online Child Protection Guide: https://www.csyw.qld.gov.au/about-us/partners/child-family/our-government-partners/queensland-child-protection-guide/online-child-protection-guide

Student / Child Protection information sheets are available to staff (info hub).

An annual review on the student/child protection policy and reporting frameworks was also undertaken in December 2020. Updated reporting workflows and materials including legislative briefing papers addressing legislative reforms including with respect to the failure to report and failure to protect were prepared and rolled out to staff. A review of reporting mechanisms were also completed with development work scoped to consolidate the 8 internal and 2 external online child protection reporting forms into one amalgamated form for ease of use and reference by staff (reviewed at the end of 2022).

	https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2011-ecsnr#sec.175		ISQ undertook a review of policy and procedures in November/December 2022. Recommendations for improvements to be implemented 2023.
	• S. 176 Time to notify certain information to Regulatory Authority https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2011-ecsnr#sec.176		
	Australian Children's Education and Care Quality Authority National Quality Framework National Quality Standard • Quality area 2 Children's health and safety Standard 2.2. Safety Element 2.2.3 Child Protection – Management, educators and staff are aware of their roles and responsibilities to identify and respond to every child at risk of abuse or neglect. • Quality area 5 Relationships with children Standard 5.1 Relationships between educators and children Element 5.1.1 Positive Educator to child interactions Element 5.1.2 Dignity of rights of the child *Education and Care Service Act* 2013 • s. 109 Approved provider's overriding responsibility [in particular ss (b) https://www.legislation.qld.gov.au/view/html/inforce/current/act-2013-044#sec.109 • s. 122 Children must be protected from harm and hazards (harm is as defined in the CPA) https://www.legislation.qld.gov.au/view/html/inforce/current/act-2013-044#sec.122		

POLICIES AND PROCEDURES • ECS Child Protection Policy and Procedures • John Paul College Statement of Commitment to the Safety and Wellbeing of Children and the Protection of Children from Harm • ELC/Kindergarten- Grievance and Complaints Policy • John Paul College – Complaints Handling Policy • OSHC – Complaints Handling Policy • Professional Boundaries Policy *Education General Provisions Act* 2006 *Education (Accreditation of Non-State Schools) Regulation* 2017 (s. 16) **Student / Child Protection (Staff Portal)** **Child Protection Reporting forms and processes:** Reporting forms • Sexual Abuse / Likely Sexual Abuse or Harm • E-Report of Suspected Child in Need of Protection • Inappropriate Behaviour Report (internal use only) • Record of Harm or Concerning Behaviour (internal use only) Referral forms to a community- based support service • E-Referral Family and Child Connect • Consent to Share Information / Referral Form (internal use only) **Early Childhood Australia Code of Ethics** **Queensland College of Teachers Code of Ethics for Teachers in Queensland**		

	Queensland College of Teachers Notices		
	• QCoT Section 76 Notice of Investigation		
	• QCoT Section 77 Notice Resignation		
	• QCoT Section 78 Notice Dismissal		
	Professional Standards for Queensland Teachers		
	Department of Child Safety, Youth and Women:		
	https://www.communities.qld.gov.au/childsafety/protecting-children/reporting-child-abuse		

Part 3: CONCERNS

Child and Youth Risk Management Strategy

5. A plan for managing breaches of the risk management strategy.			
Action/s	**Reference**	**Responsible Officer**	**Evidence**
ECS at John Paul College has policies and procedures in place for managing any action or inaction by a person that fails to comply with any of the policies and procedures which make up our risk management strategy. A plan allows the organisation to manage potential breaches in a fair and supportive manner. All Staff, Contractors, Volunteers or other person who is on campus is required to complete an online induction as well as an induction session where policies and procedures are outlined and advised where to find relevant information as well as what will occur should they breach any of the school policy or procedures. The JPC Working with Children Policy and the Breach Management Policy provides the processes and procedures to be followed in the event of an actual or potential breach with remedial strategies including but not limited to: • noting the incident, ensuring that it has been rectified; • referring the matter to the Internal Risk Committee or to the C&YRM Committee; • initiating an internal college investigation; • initiating an external investigation; • commissioning an audit / review (internal or external);	*Working with Children (Risk Management and Screening) Act 2000* *Failure to Report / Failure to Protection introduced under the Criminal Code (Child Sexual Offences Reform) and other Legislation Amendment Act 2020 (QLD)* *Civil Liability and Other Legislation Amendment Act (reverse burden of proof)* *Child Protection Act* 1999 Queensland College of Teachers Code of Ethics for Teachers in Queensland Professional Standards for Queensland Teachers ECS Child Protection Policy and Procedures John Paul College Statement of Commitment to the Safety and Wellbeing of Children and the Protection of Children from Harm Education (Queensland College of Teachers) Act 2005 Fair Work Act 2009 Working with Children Policy and Procedures **Reporting form (internal use)**	Approved Provider (Board of Directors) Approved Provider Delegate Nominated Supervisors: • Head of Early Education • Head of Outside School Hours Care Deputy Principal/Head of Primary (Operational Supervisor) Compliance Officer (Blue Card Coordinator)	Breaches are managed in accordance with relevant policies and procedures as appropriate with the circumstances. • John Paul College Breach Management Policy • John Paul College Complaints Handling Policy • ELC/Kindergarten-Grievance and Complaints Policy • OSHC – Complaints Handling Policy • John Paul College Working with Children Policy and Procedures • All Codes of Conduct • All policies and procedures available in hardcopy in reception, staff rooms and offices of the Nominated ECS Supervisors. • Documentation of breaches (centralised compliance) and disciplinary action (managed in consultation with JPC HR)

• report to the Department of Justice / Blue Card Services; or • report to the police/child safety.	• Breach Management Policy and Procedure including Reporting Form • Whistleblowing Policy and Procedure including Reporting Form		• Incident forms and ACECQA reporting documentation with notification to the Regulatory Body on the occurrence of any serious incidents . Breaches for Teaching Staff are also managed in accordance with the Queensland College of Teachers – Standards and Conduct and the Education (QCT) Act which require teachers not only be registered to teach and meet professional teaching standards but also to meet standards of ethical conduct, especially in dealings with children. Minutes of: • C&YRM Committee • Internal Risk Management Committee • Audit and Risk Committee. Breaches reporting is provided to Principal and Audit and Risk Committee.

Child and Youth Risk Management Strategy

6. Risk management plans for high risk activities and special events.

Action/s	Reference	Responsible Officer	Evidence
Forward planning to identify risks and implement strategies can assist to reduce the possibility of children being harmed. It is important to recognise that in order for a child to suffer harm, there must be an opportunity for harm to arise. These opportunities can be reduced by developing specific policies and procedures to manage high risk activities and special events. The ECS at John Paul College has thorough policies and procedures to ensure appropriate control measures are in place and implemented to manage identified risks. All Incursions or events are approved by the Nominated Supervisor in conjunction with the Deputy Principal/Head of Primary. Risk assessments are conducted to identify and assess risks that the incursion, event or excursion may pose to the safety, health or wellbeing of any child participating in these activities. A Function Request Form is lodged with management and a risk assessment undertaken for an event when approved. A risk assessment is conducted for all regular outings within John Paul College and updated annually. As per Regulation 101, a risk assessment must be conducted for all excursions. The risk assessment must consider: - The proposed route and destination for the excursion; and	AS/NZS ISO 31000:2009 Risk Management Principles and Guidelines ECS Child Protection Policy and Procedures John Paul College Statement of Commitment to the Safety and Wellbeing of Children and the Protection of Children from Harm ELC/Kindergarten Excursion & Incursion Policy OSHC – Excursion and Transport for Excursion Policy OSHC – Incursion Policy Workplace Health and Safety Event, Tour and Excursion Risk Assessment Forms Education and Care Services National Law Act 2011 Education and Care Services National Regulations Australian Children's Education and Care Quality Authority National Quality Framework	Approved Provider (Board of Directors) Approved Provider Delegate Nominated Supervisors: • Head of Early Education (Kindergarten) • Head of Outside School Hours Care Deputy Principal/Head of Primary (Operational Supervisor) Workplace Health & Safety Officer	A risk assessment is completed for events and activities, on or off site in consultation with the JPC Workplace Health and Safety Officer. Appropriate risk management reduces the risk level of activities and the inherent risk levels are: **Low**: little chance of incident or injury (Acceptable) **Medium**: some chance of an accident and injury requiring first aid (Justifiable) **High:** likely chance of a serious injury requiring medical treatment; **Extreme**: high chance of a serious injury resulting in a highly debilitating injury. (Unacceptable) Completed Risk Assessments are submitted to the Nominated Supervisor according to the Education and Care Regulations and are finalised in consultation with the JPC Workplace Health and Safety Officer. A note regarding specific medical or behavioural concerns (including mental health concerns) is included. Individual Medication, Anaphylaxis and Asthma Management plans are visible in the classrooms / OSHC Office.

- Any water hazards and any risks associated with water-based activities; and - Transport to and from the proposed destination noting that a specific transportation policy, detailed transportation specific risk assessment and transportation scenario testing plans must be in place to support this; and - The number of adults and children involved; and - Given the risks posed by the excursion the number of educators and other responsible adults that is appropriate to provide supervision and whether any adults with specialised skills are required; and - The proposed activities; and - The proposed duration of the excursion; and - The items that should be taken on the excursion Risk Assessments must be approved by the Nominated Supervisor and the WHS Officer to reduce the possibility of students being harmed. Each Risk Assessment identifies areas of potential risk and lists the corresponding controls. Each Risk Assessment is then evaluated (post controls) and given a risk rating using a traditional risk score table (taking into account the likelihood of any hazards occurring and the consequences that may result). Students/children are responsible for complying with the College's policies; following the instructions of staff and adopting appropriate behaviour. Identify spaces on site which pose a risk for students and staff in their interactions.	Queensland College of Teachers Code of Ethics for Teachers in Queensland Professional Standards for Queensland Teachers		Staying Healthy in Childcare (5th Edition) documentation is visible in the Foyer or Administration Office (ELC, Kindergarten and OSHC). Relief Teachers and Educators follow centralised HR selection and recruitment protocols and are provided with an induction process, a Staff Handbook and Policy and Procedure documents All Forms include: • Risk Assessment Form • Excursion Form and Permission • Incident, Injury, Trauma and Illness Report • Illness Report Form (2020) ECS policies and procedures are regularly under review and follow the issuance of the latest regulatory guidance. Before any high-risk activities (as defined under the College's General Liability Policy) are undertaken additional provider due diligence is also required to be completed with advance notification and approval from the College insurer. This is more relevant to OSHC given the nature of the activities. Audit of spaces on site for 'concealed' areas. Action remediation to ensure appropriate

			visibility of interactions. (Eg where a door has no external window)

Child and Youth Risk Management Strategy

7. Policies and Procedures for Managing Compliance with the Blue Card System

Action/s	Reference	Responsible Officer	Evidence
The organisation must outline policies and procedures to ensure compliance with the Blue Card System requirements under the Working with Children (Risk Management and Screening) Act.	Working with Children Policy and Procedure	Approved Provider (Board of Directors)	Working with Children Policy and Procedure
	ECS Child Protection Policy and Procedures	Approved Provider Delegate	Volunteer Management Policy
By ensuring that the school is complying with the legislative requirements under the Blue Card System, the school can demonstrate to stakeholders that it is committed to maintaining a safe and supportive environment for children and young people.	John Paul College Statement of Commitment to the Safety and Wellbeing of Children and the Protection of Children from Harm	Nominated Supervisors: Head of Early Education (Kindergarten) Head of Outside Schools Hours Care	Staff, Contractor and Volunteer onboarding protocols (workflow) **Working with Children check**
Monitoring of Blue Card compliance and expiry is undertaken with automated exceptions reporting overseen by the College's Compliance Officer (Blue Card Coordinator) and Working with Children Organisational Representatives under guidance/direction from the Deputy Principal (Culture and Compliance)	Working with Children (Risk Management & Screening) Act 2000 Department of Justice and Attorney General's Office / Blue Card Services	Deputy Principal/Head of Primary (Operational Supervisor)	Processes in place to ensure: - Initial Working with Children Blue Card Screening - Online Validation - Linking; and - Ongoing monitoring – Blue Card Register
Note: No Card No Start legislative regime was introduced 31 August 2020. From 31 August 2020 no person is permitted to be engaged in Regulated Employment without holding a current and valid Blue Card and being linked to the College via the Blue Card Services Organisational Portal. Certain exemptions apply for those engaged in Restricted Employment however a WWC Declaration is required to be completed and engagements monitored by the WWC Organisational Representatives.	Blue Card Services Organisational Portal Early Childhood Australia Code of Ethics Queensland College of Teachers Code of Ethics for Teachers in Queensland Professional Standards for Queensland Teachers Education and Care Services National Law Act 2011	Deputy Principal (Culture and Compliance) Working with Children Compliance Officer (Blue Card Co-ordinator) Working with Children Organisational Representative	Initial Blue Card Screening Forms: - Blue Card Application (Paid/Volunteer/Exemption/Business) - Link an application/cardholder via the Blue Card Organisational Portal - Volunteer to paid employment transfer form Annual training on Working with Children Requirements including No Card No Start and designation of WWC Organisational Representatives is rolled out at the commencement of each year.

	Education and Care Services National Regulations Australian Children's Education and Care Quality Authority National Quality Framework		WWC Organisational Representative networking meetings (with representatives from the ECS) are facilitated each quarter. WWCC Organisational Representatives training package was also developed and rolled out in response to the latest legislative reforms in August 2020.
John Paul College is committed to maintaining a safe and supportive learning environment for students. To ensure compliance with relevant legislation and policy and to inform improvements, an independent review was undertaken in 2018 following which the College undertook a review of the college Blue Card Policy and procedures; establishment a Child and Youth Risk Management Committee; instituted annual reviews and update of the College and ECS C&YRM Strategy; appointed a Compliance Officer (Blue Card Coordinator), scoped and scheduled development within Synergetic (College and ECS Blue Card Register) to support monitoring and audit assurance including the internal processes to identify and report actual or potential breaches of the Blue Card System and this strategy. WWC Organisational Representatives were designated for oversight across devolved engagement of volunteers and contractors, associated working with children's resources and training was developed and rolled out with quarterly networking meetings of the WWC Org representatives facilitated. **Blue Card Screening:** As required by legislation and the John Paul College Working with Children Policy and Procedure, the College has a comprehensive rigorous process for ensuring that all persons being engaged in 'Regulated Employment' hold a current valid Working with Children Clearance (previously referred to as a Positive Notice or Blue Card). This process is managed by HR for staff, and the WWC Organisational Representatives for contractors and volunteers both of which are overseen by the Compliance Officer (Blue Card	**Relevant legislation** *Working with Children (Risk Management and Screening) Act* 2000 *Working with Children (Risk Management and Screening) Regulation* 2011 *Education (Accreditation of Non-State Schools) Regulation* 2017 (s. 15) **Relevant policies and procedures** • Working with Children Policy and Procedure • Blue Card Coordinator Workbook • Child and Youth Risk Management Strategy; • Child and Youth Risk Management Committee Terms of Reference • Working with Children (Blue Card) Screening including expiry and exceptions reporting (further development underway to improve	John Paul College Ltd Board of Directors Principal Child and Youth Risk Management Committee Director of Human Resources Director of John Paul College International Deputy Principal (Culture and Compliance) Compliance Officer (Blue Card Co-ordinator) JPC WWC Organisation Representatives	Working with Children Policy and Procedure C&YRM Strategy approved by the Principal and endorsed by the Board of Directors annually Policies and CRYMS are available on the staff portal (intranet) Centralisation of employment selection and recruitment protocols Employee Register (Blue Card Register) and DOJA / Blue Card Services Organisational Portal Key staff have received training on Working with Children Policy and Procedure/ Legislative Requirements and the Child and Youth Risk Management Strategy Automated Working with Children Blue Card Exceptions reporting review and monitoring by WWC Organisational Representatives and the Compliance Officer (Blue Card Coordinator) under guidance from the Deputy Principal (Culture and Compliance) Audit and Risk Committee Breach Reporting

Coordinator) under direction and guidance from the Director of Human Resources. Particular attention is made to the process of 'Compliance Met' as it relates to staff who need both teacher registration and a Blue Card (E.g. ECS Teacher). The Heads of the relevant services are also responsible for ensuring oversight and compliance with Working with Children obligations across their respective services. The Compliance Officer (Blue Card Coordinator) supports a number of key staff to fulfil the role of Working with Children Organisation Representatives. **Note: no employee, volunteer or contractor is permitted to commence in 'Regulated Employment' with JPC unless they have met their legislative requirements for Working with Children.** **All current valid Blue Cards (Paid and Volunteer) and Exemption Cards will, prior to or upon commencement of 'Regulated Employment', be linked to JPC.** **Child and Youth Risk Management Strategy** The review of this strategy is undertaken annually as outlined in the Working with Children Policy and Procedures. The Child and Youth Risk Management Committee chaired by the Deputy Principal (Culture and Compliance) is responsible for this review. **Compliance and ongoing monitoring** Blue Card exceptions reporting is monitored and overseen by the Compliance Officer (Blue Card Coordinator) in consultation with Working with Children Organisational Representatives. The John Paul College Working with Children and Breach Management Policy details the process by which the College will manage potential breaches of Working with Children legislative requirements.	oversight and reporting); and - Compliance and ongoing monitoring - Breach Management Policy and Procedure **Child and Youth Risk Management Committee** - Deputy Principal (Culture and Compliance) – Chair - Deputy Principal/Head of Primary - Deputy Principal/Head of Secondary - Head of Boarding - College Counsellors - Deans of Academic Welfare - Head of Early Education (Kindergarten) - Head of OSHC - Deputy Head of International Operations - Director of John Paul College International - Head of Sport and Activities - Head of Performing Arts - Director of Human Resources - Dean of Administration - Workplace Health and Safety Officer		

Child and Youth Risk Management Strategy

8. Strategies for communication and support

Action/s	Reference	Responsible Officer	Evidence
John Paul College ECS must have strategies for communication of the Risk Management Strategy and support. Strategies for communication and support must include: • Written information for parents, employees and volunteers that includes details of the organisation's risk management strategy or where the strategy can be accessed; (in development) and • Training materials for employees and volunteers which help identify: ○ Risks of harm and how to handle disclosures or suspicions of harm. Stakeholders of the ECS at John Paul College consist of children and young people, employees, College Board members, parents, and volunteers. By providing communication and support, the ECSs at JPC: • ensures that all people in the organisation are aware of their responsibilities and understand what acceptable behaviour for interacting with children is. • provides updated advice based on changes to legislation (eg regarding the Criminal Code) • enable people to feel comfortable addressing issues of concerns. • highlights the importance of our commitment to protecting the safety and wellbeing of children in our service environment, and	*Working with Children (Risk Management and Screening) Act* 2000 Blue Card Services Website / Organisational Portal Early Childhood Australia Code of Ethics Queensland College of Teachers Code of Ethics for Teachers in Queensland Professional Standards for Queensland Teachers *Education and Care Services National Law Act* 2011 *Education and Care Services National Regulations* Australian Children's Education and Care Quality Authority National Quality Framework	Approved Provider (Board of Directors) Approved Provider Delegate Nominated Supervisors: • Head of Early Education • Head of Outside School Hours Care Deputy Principal/Head of Primary School (Operational Supervisor) Educators/Teachers	Staff and all members of the community can access resources relating to Child Protection including Working with Children and Volunteer Management Policies and Procedures through: • Displays / policy documents in reception areas • Workplace Health and Safety documentation – i.e. Excursion / Incursion Risk Assessment Template • ELC and Kindergarten - ACECQA documentation and other relevant information such as Staying Healthy in Childcare (online and using the iPads in reception area) Communication to stakeholders regarding the Strategy includes: Staff: • Email communication • Staff Meetings • Professional Development Sessions and Register • Induction procedures for all paid employees and volunteers • Policy and Procedure review • Regular mandatory training **Parents and carers:** • Email communication • Parent Information sessions • ECS Parent Library – Books / Resources on child protection

			Children / Students:
• reduces the likelihood of breaches of our Child and Youth Risk Management Strategy. Effectiveness of our communication to our stakeholders reviewed annually involving children / students, staff and parent representatives.			• Posters • Child Protection Week activities and other educational events with invited guest speakers • Cyber Safety Week activities • OSHC - Safe Place Board
Staff may require support to deal with issues such as behaviour management, stress, conflict, bullying, child protection concerns, breaches of the risk management strategy and dealing with disclosures or suspicions of harm.	Early Childhood Australia Code of Ethics Queensland College of Teachers Code of Ethics for Teachers in Queensland Professional Standards for Queensland Teachers Australian Children's Education and Care Quality Authority National Quality Framework Education and Care Services National Law Act 2011 Education and Care Services National Regulations	Nominated Supervisor Deputy Principal/Head of Primary School (Operational Supervisor)	JPC ECS are committed to the wellbeing of staff. Nominated Supervisors and Operational Supervisor provide guidance and support through advice, counselling, reference to evidence-based research, empathy and referral to medical practitioners. (as required) We also make available to staff confidential employment support services – EAP. Wellbeing check-ins (formal/informal) with performance management discussions conducted at a minimum annually. Performance management to be transitioned to ELMO (online onboarding, performance and learning management system for personnel)