PMSA Child Protection Risk Management Strategy - 2016

Our Values

Relationships • Care • Ethics • Personal Development • Excellence • Celebration
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PREFACE

The purpose of the PMSA Child Protection Risk Management Strategy is to help to identify potential risks of harm to children and young people in PMSA schools and to implement strategies to prevent and minimise those risks. This strategy also aims to provide a clear and consistent framework to assist all who work in our schools to value and guide their relationships with the children and young people in their care.

This Child Protection Risk Management Strategy is evidence of the PMSA's commitment to the safety and wellbeing of children and the protection of children from harm in fulfilment of the requirements of section 3(1)(a) of the Working with Children (Risk Management and Screening) Regulation 2011 (Qld).

SCOPE

This Child Protection Risk Management Strategy applies to all employees, including volunteers, of PMSA schools, Early Learning Centres and agencies. The Strategy identifies the policies and procedures in place across the PMSA and its schools which, together, act to protect students from harm. It also identifies strategies in place for recruiting, selecting, training and managing employees; policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines; risk identification and management; communication and support about matters relating to child protection and processes for managing breaches of the PMSA Child Protection Policy.

RELATED LEGISLATION

- Child Protection Act (1999) (Qld)
- Child Protection Regulation 2011 (Qld)
- Education and Care Services National Law (Queensland) Act 2011(Qld)
- Education and Care Services National Law (Queensland) Regulation 2011
- Education and Care Service Act 2013 (Qld)
- Education and Care Services Regulation 2013
- Education (General Provisions Act) 2006 (Qld)
- Education (General Provisions) Regulation 2006 (Qld)
- Education (Accreditation of Non-State Schools) Act 2001 (Qld)
- Education (Accreditation of Non-State Schools) Regulation 2001 (Qld)
- Education (Accreditation of Non-State Schools) Transitional Regulation 2013 (Qld)
- Education (Queensland College of Teachers) Act 2005 (Qld)
- Education (Queensland College of Teachers) Regulation 2005 (Qld)
- Education Services for Overseas Students (ESOS) Act 2000 (Cth)
- Education (Overseas Students) Act 1996 (Qld)
- Education (Overseas Students) Regulation 2014(Qld)
- Family and Child Commission Act 2014
- Limitation of Actions Act 1974 (Qld)
- Public Guardian Act 2014
- Public Health Act 2005 (Qld)
- Working with Children (Risk Management and Screening) Act 2000 (Qld)
- Working with Children (Risk Management and Screening) Regulation 2011 (Qld)
IMPLEMENTATION

In practice, the PMSA’s commitment to acting in accordance to the Working with Children (Risk Management and Screening) Act 2000 (“the Act”) to ensure the safety and wellbeing of students means that it will implement the measures outlined in the following sections of the Strategy below.

OUR COMMITMENT TO CHILD PROTECTION

The (PMSA) is committed to the safety and wellbeing of students enrolled in our schools and Early Learning Centres, and in accordance with sections 171 and 172 of the Act, is dedicated to eliminating and minimising risks to child safety through this Strategy which includes and refers to various other policies and procedures to effectively ensure the safety and wellbeing of children in the school’s care.

The PMSA’s commitment to child protection is immersed in our vision -

'To build communities based on Christian foundations, by providing teaching and learning environments of excellence, permeated by Christian faith and actions'

And in the core values and which underpin it.

We believe that the care for the children and young people in our schools is an outward expression and evidence of our Christian faith and our commitment to achieving a vision of collected and committed action, of intolerance to any threat of harm towards children and young people and which actively seeks to prevent the occurrence of any such threat.

The care and protection of the children and young people in PMSA schools is of paramount importance and involves:

- Working together to make our schools and workplaces places of safety for children and young people;
- Not tolerating any threat of harm towards children and actively seeking to prevent the occurrence of any such threat; and
- Reporting any suspicion you have that a child or student has been harmed or may be at risk of harm

Every person who shares in the work of our PMSA communities - including employees, volunteers, contractors and visitors- shares in the responsibility to care for and protect all children and young people from any threat or perceived threat of harm.

EXPECTATIONS OF EMPLOYEES COMMITMENT AND BEHAVIOUR

All PMSA employees are expected to ensure that their interactions with students are appropriate at all times and actively seek to prevent harm to children and young people, and to support those who have been harmed by making sure that their intentions, their actions and their efforts ensure a child safe environment at all times. Under their Contract of Employment it is expected that all employees will treat all children and young people respectfully and within the child protection laws of Australia (free from any form of abuse) and act appropriately and responsibly with students of all ages.
Specific protocols which relate to situations involving students include:

- Employees must not have a romantic or sexual relationship with a student.
- Employees should avoid situations where they are alone in an enclosed space with a student.
- When physical contact with a student is a necessary part of the teaching/learning experience, employees must exercise caution to ensure that the contact is appropriate and acceptable. Employees must always advise the student of what they intend doing and seek their consent.
- Employees should not transport students in their own vehicle unless they have specific permission from the student’s parent/guardian, their supervisor and/or the Principal prior to the journey, where there is no feasible option available to provide alternative transportation or in the event of emergency situation.
- Employees must not develop a relationship with any student that is, or that can be interpreted as having a personal rather than a professional interest in a student.
- Employees must not use electronic devices, such as email, social networking sites, mobile video phones and SMS texting, for the purposes of the distribution of sexually explicit material to a student/s or for solicitation or harassment. All employee interactions with students via e-mail or other electronic media use must be directly related to the educational context and must be professional at all times.
- Employees must not invite students to join their personal electronic social networking site/s or accept students’ invitations to join their social networking site/s.

The PMSA also has a Code of Conduct for Homestay Hosts which outlines the standards of behaviour expected of the Homestay Host, their families and all visitors who interact with the Homestay Student in the Homestay Residence. These standards are consistent with the values and principles of the relevant School’s Homestay Program.

This commitment is evidence of the PMSA’s fulfilment of the requirements of section 3(1)(b) of the Regulation.

POLICIES AND PROCEDURES

The PMSA and its schools are committed to providing safe environments for all children in their care by developing and implementing policies and procedures which ensure:

- All employees (including volunteers) are screened and trained in the requirements and processes of Child Protection and professional behaviour and
- Students and parents/guardians are also provided with information and education in the area of Child Protection

PMSA Abuse Policy

The PMSA Abuse Policy and associated procedures outlines the PMSA’s processes for dealing with allegations of Abuse relating to individuals who, as children, received education and/or accommodation or care within a PMSA school but who are not students of the school at the time the allegations are made, i.e. former students.

PMSA Blue Card Guidelines

The PMSA Blue Card Guidelines contains clear procedures to assist PMSA schools, Early Learning
Centres and agencies to comply with the blue card requirements for all employees and volunteers (including volunteer trainee students) outlined in the Working with Children (Risk Management and Screening) Act 2000 (Qld).

PMSA Blue Card (Working with Children) Policy
The PMSA Blue Card (Working with Children) Policy requires that all persons who are engaged in, or provide services to, student children in PMSA schools, except those volunteers who fall into the exempted categories, must have met the 'Blue Card' screening requirements, as required by the Working with Children (Risk Management & Screening) Act 2000 before commencing services.

Blue Card Register
The PMSA and each of its schools are required to establish and maintain an employee register of all paid employees and volunteers involved in child-related activities which includes:
- whether or not the person requires a blue card (if not, why not – e.g. the parent exemption applies)
- the type of application (e.g. paid or volunteer)
- when the person applied and/or the date of issue of the positive notice and blue card
- the expiry date of the blue card
- the renewal date (this should be at least 30 days before expiry to allow employees, including volunteers, to continue working in child-related employment)
- whether a negative notice has been issued
- any change in status to a blue card (e.g. a change in police information, the positive notice and blue card is cancelled or suspended);
- where there is a change in police information, the date you informed of the change
- where an employee leaves your organisation and the date you informed the Public Safety Business Agency, and
- any change of personal information of an employee, including the date they informed the Public Safety Business Agency (you should note that it is an offence for an employee to fail to notify the Agency on the appropriate form of any change in personal details within 14 days).

An audit of each school’s Blue Card register is conducted annually as part of the PMSA’s Risk Management and Assurance Program.

PMSA Child Protection Policy
The PMSA Child Protection Policy outlines the commitment of the PMSA and its schools to the welfare and well-being of the students of all its schools. The Policy covers information for handling disclosures or suspicions of harm, including the reporting of physical abuse, emotional or psychological abuse, sexual abuse or exploitation as well as neglect, inappropriate behaviour and self-harm.

The PMSA Child Protection Policy applies to all PMSA employees, volunteers and students and is available:
- on the PMSA website;
- on the website of each school;
- in the Staff Policy Handbook of each school;
- at reception of each school
- student handbooks (summarised version)
PMSA Homestay Welfare and Accommodation Policy
The PMSA Homestay Welfare and Accommodation Policy provides written processes to ensure that PMSA Schools and Homestay Hosts arranged by and for PMSA schools comply with the Education Services for Overseas Students (ESOS) Act 2000 and the requirements of Standard 5 of the National Code of Practice 2007 (National Code) for ensuring the suitability of accommodation, support and general welfare for Homestay Students under 18 years of age.

PMSA Homestay Risk Management Strategy
The PMSA Homestay Risk Management Strategy ensures that the PMSA and its schools have appropriate policies and procedures in place to identify and minimise the risk of harm to Homestay Students where the school has taken responsibility for the accommodation, support and general welfare of the student.

PMSA Human Resources Policies
Child Protection has been incorporated into the PMSA's broader human resource management framework. The PMSA Human Resources Child Protection Compliance Policy, available to all employees on the PMSA Staff Portal, establishes clear professional standards of conduct to be followed by all employees in the area of child protection and provides obligations regarding employee interactions with students that promote the protection of those students from any threat or risk of harm.

ICT Policy
Cybersafety is a serious risk management issue for the PMSA and its schools in relation to child protection. Each PMSA school has policies relating to the appropriate use of information technology within the school which outlines the protocols and procedures for the use of the school's electronic devices, including internet access, email protocols, electronic record access, security information and confidentiality requirements.

The PMSA Employment Standards Email & Internet Usage Policy also provides guidance on the proper use of internet and email systems within the PMSA and its schools and makes employees aware of what the PMSA deems as acceptable and unacceptable use of these systems.

The PMSA Child Protection Compliance Policy requires that all employees keep an appropriate professional distance from all students. This includes the appropriate use of the School's email, intranet and internet systems with students for professional and approved personal communication only, including prohibiting PMSA employees from joining the social networking sites of students and from allowing students to join their own personal social networking sites.

School's Accreditation Manual
The PMSA's School's Accreditation Manual provides all PMSA schools with strategies to meet the accreditation requirements of The Education (Accreditation of Non-State Schools) Act 2001. The Act requires PMSA schools, as established non-government schools, to demonstrate compliance once every five (5) years with key accreditation criteria. PMSA schools must provide evidence of written processes about the appropriate conduct of staff and students, that accord with legislation applying in the State about the care and protection of children, including processes for:

- the reporting by a student to a stated staff member of behaviour of another staff member that the student considers is inappropriate; and
- how the information reported to that stated staff member must be dealt with by that stated staff member.
Student Guide for Protection from Abuse or Harm
A “Student Guide for Protection from Abuse or Harm” is included in all student handbooks and students are informed at assembly and regular classroom meetings about how to protect themselves, and who to report to if they are concerned about their safety.

Ten Commandments of Child Protection for Staff at PMSA Schools
The PMSA has developed the "Ten Commandments of Child Protection for Staff at PMSA Schools and Workplaces", designed to cover the ten most important things for individuals to remember, as an employee of the PMSA, in respect to child protection.

All PMSA Child Protection Policies and Risk Management Strategies are available on the PMSA website or on the PMSA Staff Portal.

RECRUITMENT, SELECTION AND SCREENING

The PMSA and its schools recognise that risk management in relation to child protection begins with the recruiting, selection and screening of the right people to work in its schools. Compliance with PMSA Policies on child protection, prescribed notices (Blue Cards) and the prevention and reporting of Abuse is a condition of employment with the PMSA and its schools.

It is the policy of the PMSA and its schools that every PMSA employee (except for exempt categories such as teachers), volunteers and contractors (including sports and activities coaches, music tutors and boarding house tutors) must receive a Positive Notice from the Public Safety Business Agency (PSBA), known as a ‘Blue Card’, as part of their condition of employment with the PMSA.

Teachers undergo a similar screening process as part of their teacher registration process and are therefore exempt from the blue card application process.

All PMSA employees, volunteers and contractors are made aware as part of the recruitment, selection and screening process, of their responsibilities to:

• Obtain a blue card and ensure they have met the required screening obligations prior to undertaking work with students (with the exception of registered teachers);
• Agree to advise the school and the Public Safety Business Agency (PSBA) of any changes required by the relevant Act or Regulations (e.g. change of address, change of Notice status);
• To make all disclosures to the PMSA, as required by the Public Safety Business Agency (PSBA), that may affect the issuing to you of a positive prescribed notice, Blue Card;
• Abide by the PMSA policies and procedures on Child Protection and Abuse and participate in compulsory training on these policies and procedures.
• Ensure their blue card is renewed every 3 years as required by the Public Safety Business Agency.

All employees, volunteers and contractors (including sports and activities coaches, music tutors and boarding house tutors) are also provided with a warning on commencement of employment, as required by the Working with Children (Risk Management and Screening) Act 2000, that it is an offence for a ‘disqualified person’ to sign a blue card application or renewal form.

The PMSA Recruitment and Selection Policy outlines the policy and guidelines for the recruitment and
selection of employees in PMSA schools and workplaces.

Blue Card Screening Requirements
As required by the Working with Children (Risk Management and Screening) Act 2000, the PMSA requires that the following screening requirements must be met by all employees, volunteers and contractors (including sports and activities coaches, music tutors and boarding house tutors):

Paid Employees (with the exception of teachers)
- If the individual does not already possess a current Blue Card, they **MUST NOT** engage in work with students **prior to** lodging an application, for a Blue Card, with the Public Safety Business Agency.
- An individual must not continue to work with students if their blue card has expired and they have not yet lodged a Blue Card renewal application with the Public Safety Business Agency within the required timeframes.
- An individual must not continue to work with students if they have been issued with a negative notice or if their blue card has been cancelled or suspended by the Public Safety Business Agency.
- An individual must not continue to work with students if they have had a change in their police information after being issued with a card.

Volunteers
An individual engaged by the PMSA on a volunteer basis (including Councillors) **MUST NOT**:
- engage in work with students **prior to** being issued with a Blue Card from the Public Safety Business Agency.
- continue to work with students if their blue card has expired and their Blue Card has not yet been renewed by the Public Safety Business Agency within the required timeframes. That is, the individual is not in possession of a current Blue Card and has not submitted a Blue Card Renewal form to the Public Safety Business Agency more than **30 days prior** to the expiry date.
- continue to work with students if they have been issued with a negative notice or if their blue card has been cancelled or suspended by the Public Safety Business Agency.
- must not continue to work with students if they have had a change in their police information after being issued with a card.

Sports and Activity Coaches, Music Tutors, Boarding House Tutors and Volunteers
Given the extent of the PMSA schools’ annual sports, activities and music programs, there is a significant requirement to source a large number of coaches and tutors within PMSA schools.

To ensure persons who fill these positions are suitable for working with children, each school will check a returning or potential coach or tutor’s blue card status **prior to** confirming appointment each season.

Using a database managed by each school’s Blue Card Officer, the School via the Sports & Activities Office, Music Department or Boarding House, will record the details of seasonal coach / tutor blue card eligibility. Letters of appointment / contracts for service will not be issued until the relevant screening requirements have been met. Each PMSA school may lodge a Paid application form on behalf of the coach / tutor to effect immediate eligibility to commence only if the individual is employed as a Paid Employee. Copies of application details will be retained on file by the school’s Blue Card Officer.
This commitment is evidence of the PMSA’s fulfilment of the requirements of section 3(1)(f)(ii) of the Regulation.

INDUCTION AND PROFESSIONAL DEVELOPMENT

Induction
Each PMSA school has a written induction process for all employees during the first twelve months of appointment to assist new employees to understand their role in providing a safe and supportive environment for children and young people within their schools. This process includes training and education in Child Protection to ensure all staff are familiar with relevant legislation and policy obligations, in accordance with requirements outlined by the Working with Children (Risk Management and Screening) Act 2000 (Qld) and PMSA Child Protection policies and procedures, and fully understand their role in respect of reducing exposure to child protection risks, including responsibilities and procedures for handling and reporting disclosures or suspicions of harm.

Information relating specifically to child protection is provided to all new employees at the PMSA New Staff Induction Day, held in January of each year. The new staff induction aims to assist employees through the provision of information including, but not limited to:

- the PMSA’s commitment to learning environments that are safe and supportive for children and young people;
- established protocols and standards of behaviour for employees to ensure that their behaviour towards, and relationships with, children and young people reflect appropriate standards of care;
- directing all new employees to the PMSA and individual school’s child protection policies and procedures including the PMSA Child Protection Policy, PMSA Abuse Policy and this Child Protection Risk Management Strategy;
- procedures to follow when a disclosure of harm is received;
- reporting guidelines in relation to disclosures of harm and suspicions of harm;
- employees rights and responsibilities, as well as those of children and young people;
- what to expect if there is an allegation of harm made against them or to them;
- what constitutes a breach of the PMSA’s Child Protection Risk Management Strategy and the potential consequences;
- the roles of key people in the PMSA and its schools specifically relating to child protection, and grievance procedures.

As part of the PMSA’s commitment to child protection risk management, attendance at this Induction Day is mandatory for all new employees.

Each PMSA school also has a written induction process for volunteers and contractors which covers education on child protection policies and procedures in PMSA schools.

A copy of “The Ten Commandments for Child Protection at PMSA Schools” is also included in the information provided to all new staff at the PMSA New Staff Induction Day, held in January of each year.

Professional Development

To assist all who work in PMSA schools and Early Learning Centres to value and guide their relationships with the children and young people in their care, the PMSA has developed a Child Protection Professional Development Program. This Program includes mandatory on-line PMSA Child Protection training delivered to all employees including sports and activities coaches, music tutors
and boarding house tutors on commencement of employment and then annually. The aim of this training is to ensure all employees fully understand their role in respect to child protection in PMSA schools, including their responsibilities for handling and reporting disclosures or suspicions of harm.

The PMSA mandatory online child protection training includes training in the following areas:
- definition of abuse and harm, including harm perpetrated by electronic communication such as email, social networking sites and mobile phones including SMS texting;
- strategies for identifying, assessing and minimising child protection risks;
- protocols for interacting with children and young people;
- identifying the policies and procedures in place across the PMSA and its schools which, together, will assist employees to understand their responsibilities and demonstrate their commitment to protecting children and young people through appropriate actions and behaviours, and
- handling a disclosure or suspicion of harm, including reporting guidelines.

It is a requirement that all employees complete this training within one week of commencing employment and then on an annual basis, preferably within the Staff Professional Development days of each new school year.

The training is assessment based with electronic records kept of training completion for each employee. The Principal of each PMSA school has oversight responsibility for ensuring the completion of this training, within the required timeframes, by all who work at their school.

Each school's compliance with mandatory online training requirements is conducted annually as part of the PMSA’s Risk Management and Assurance Program.

A copy of the document, “The Ten Commandments for Child Protection at PMSA Schools” can be viewed and/or downloaded by each employee as part of completing their online Child Protection training.

In addition to the mandatory online Child Protection training, all schools provide on-going in-service training and education to employees in relation to behaviour management, anti-bullying, disabilities and the inclusion of child protection into risk management plans for high risk activities and special events.

This commitment is evidence of the PMSA's fulfilment of the requirements of section 3(1)(c) of the Regulation.

**EXTERNAL CONTRACTORS**

The PMSA recognises that there may be risks associated with external contractors and their employees and consultants entering its schools, for construction projects and other services. As such child protection risks are identified and managed in PMSA schools through protocols which require all external contractors to be trained in appropriate expected behaviours whilst working within PMSA schools or Early Learning Centres which include, but are not limited to:
- Avoiding contact with students at all times
- Never being in contact with students without school staff supervision.
- Never using student facilities (e.g. toilets)
- Wearing appropriate clothing at all times.
• Staying within an agreed working area and access routes
• Reporting immediately, to an employee, if approached by a student for any reason
• Never using profane or inappropriate language when students are present
• Never communicating with students via electronic communication, including via social media sites, email, mobile phone or SMS texting.
• Be made aware of the school's child protection provisions (e.g. knowledge of where they can be found).

Each PMSA school develops a statement on the appropriate behaviours expected for all external contractors, including subcontractors and their staff, and requires such individuals to read the document. If a contractor's appointment becomes permanent or the contractor has employees visiting the school regularly, then a Blue Card will be requested by the PMSA School for these employees.

INTERNATIONAL HOMESTAY PROGRAMS

PMSA schools providing International Homestay Programs are required to comply with their legal requirements under the Education Services for Overseas Students (ESOS) Act 2000 (Cth), the Education (Overseas Students) Act 1996 (Qld), the PMSA Child Protection Policy, the PMSA Homestay Welfare and Accommodation Policy and the PMSA Homestay Risk Management Strategy.

PLANNING HIGH RISK ACTIVITIES AND SPECIAL EVENTS

Each PMSA school has a Risk Management Committee with the role of identifying risks to students of the school when developing risk management plans for high risk activities and special events in which students participate. The types of activities and events that would be included under this category include, but are not limited to, student billeting, sporting carnivals, school excursions and camps. All staff members are expected to report risk activities to the Committee, as well as to identify risks related to activities under their supervision to ensure child protection issues are addressed as part of the standard risk management processes in the school.

This commitment is evidence of the PMSA's fulfilment of the requirements of section 3(1)(g) of the Regulation.

MARKETING AND ADVERTISING

All PMSA schools have in place a policy for the use of key messages and images featuring children and will ensure, in respect of photographs of students of PMSA schools that:
• The permission of the parent or guardian of the child has been obtained including specification by the parent and child as to how the image will be used; and
• When obtaining consent to use an image the child’s confidentiality is maintained and the child is not put at risk or the child’s best interest compromised.

COMMUNICATION AND SUPPORT STRATEGIES

Students and Parents
This policy will be made available to students and parents of PMSA schools, children and parents of PMSA Early Learning Centres and Homestay Hosts arranged by and for PMSA schools via the relevant
school website, student diary, parent manuals, including that for boarders, and Homestay Handbook, and by display on at least one noticeboard at each school and each Early Learning Centre, always. The attention of parents, students and children will be drawn to the Policy at least twice a year via the School and Early Learning Centre newsletters. The Principals and Nominated Supervisors will ensure that a copy of this Policy is always available from the administration of each PMSA school and each PMSA Early Learning Centre respectively.

A “Student Guide for Protection from Abuse or Harm” is included in all student handbooks and students are informed at assembly and regular classroom meetings about how to protect themselves, and who to report to if they are concerned about their safety.

Employees
All PMSA employees are directed to the PMSA Child Protection Policy, PMSA Abuse Policy and this Child Protection Risk Management Strategy through the staff handbook, and in particular, on the first Staff Professional Development Day of each school year for school staff, the first staff meeting of the year for Early Learning Centre staff, and to all new staff at the time of appointment. The PMSA requires all employees (including sports and activities coaches, music tutors and boarding house tutors and supervisors) to complete a mandatory PMSA Child Protection training which is delivered to all employees on-line via the PMSA Staff Portal. It is a condition of employment that all employees complete this training on their appointment and then on an annual basis.

All PMSA policies and risk management strategies are available on the PMSA website and/or available to all staff via the PMSA Staff Portal.

This is evidence of fulfilment of the requirements of section 3(1)(h)(ii) of the Regulation.

REPORTING AND RESPONDING TO DISCLOSURES OR SUSPICIONS OF ABUSE/HARM

Reporting Disclosures or Suspicions of Harm

The PMSA recognises that everyone who works in a PMSA school or Early Learning Centre has multiple legislative obligations in respect to reporting harm or suspicions of harm to a child. This includes the reporting of sexual abuse through the Principal, to Police (under the Education (General Provisions Act) 2006) and in the case of teachers as mandatory reporters, through the Principal to Child Safety (under the Child Protection Act 1999). All staff, including teachers, also have a duty to report physical abuse under both the Child Protection Act 1999 and the Education (Accreditation of Non-State Schools) Regulations 2001 through their Principal to Child Safety.

From January 2015, all teachers working in PMSA Schools have additional mandatory reporting obligations under the Child Protection Act 1999. These additional obligations apply to harm which relates to sexual and physical abuse only.

The PMSA Child Protection Policy outlines the procedures for reporting and responding to disclosures of harm, including self-harm, regardless of whether:

- The harm to the child or young person has been caused by a person from within or outside a PMSA school, or
- The child or young person disclosing the harm is from within or outside a PMSA school.

All employees (including teachers) MUST, if they become aware or reasonably suspect that harm has been caused by anyone to a student of a PMSA school or PMSA Early Learning Centre, who was under
18 years of age at the time of the Abuse occurring, immediately give a written report about the Abuse or suspected Abuse to the Principal, or Nominated Supervisor of the centre, and keep a written record of the actions taken. This includes:

- if an employee is aware or reasonably suspects that a student has been, or is likely to be, sexually abused by another person *Education (General Provisions) Act 2006*
- if an employee is aware or reasonably suspects that a student has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical abuse, psychological or emotional abuse, neglect or sexual abuse or exploitation; and the employee is aware or reasonably suspect that a student may not have a parent able and willing to protect the child from the harm (*Education (Accreditation of Non-State Schools) Regulations 2001*).
- If an employee has a concern about harm to a student that does not reach the level of reporting to Child Safety (*Education (Accreditation of Non-State Schools) Regulations 2001*). Harm reported by all employees under the Accreditation Regulations must now meet both the **Significant Harm and Parent Tests** before a report can be made to Child Safety.
- If an employee has a concern about harm to a child or young person caused by sexual and/or physical abuse that does not reach the level of reporting to Child Safety (*Child Protection Act 1999*).
- If a student has reported to you behaviour of another staff member that the student considers is inappropriate. (*Education (Accreditation of Non-State Schools) Regulations 2001*).

**Teachers Only**

If a teacher has a 'reportable suspicion', i.e. a reasonable suspicion that a student has suffered, is suffering, or is at unacceptable risk of suffering significant harm caused by physical or sexual abuse; **and** may not have a parent able and willing to protect the child from the harm (*Child Protection Act 1999*)

In assessing whether a student is in need of protection, the staff member or Principal will consider the "Significant Harm Test" and the "Parent Willing and Able Test" as detailed in the PMSA Child Protection Policy, as well as utilise the Department of Communities, Child Safety and Disability Services’ Child Protection Guide resource.

The PMSA Child Protection Policy covers, in detail, the information that must be contained in a written report about a sexual abuse matter.

If an employee suspects the Principal is involved in the abuse, they must directly inform, in writing, a member of the governing body of the school or any other member of the PMSA Council.

Each PMSA school provides a register in the Principal’s office of all incidents related to sexual abuse, harm or inappropriate behaviour. Where an incident is reported, full details, including the steps taken to resolve the incident, are entered in the register.

The Register of each school is audited annually by the PMSA to ensure that allegations have been dealt with in accordance with published policies and procedures.

The PMSA Child Protection Policy provides for a comprehensive complaints handling procedure, for access by staff, parents and students, in cases where an issue is not resolved to their satisfaction.

A Summary of the processes for reporting harm can be found in Appendix 1 of this Strategy.
Responding to a Disclosure or Suspicion of Harm

Once an employee has reported alleged harm of a child, the Principal will do whatever is necessary to make sure that the child is safe. All reports of harm or suspected harm to a child or young person will be treated very seriously, dealt with immediately and reported to the appropriate authorities where necessary.

In accordance with section 76 of the *Education (Queensland College of Teachers) Act 2005* a Principal who investigates an allegation of harm caused or likely to be caused to a child because of the conduct of a teacher must, as soon as practicable after the investigation starts, inform the Queensland College of Teachers (QCT) of the investigation.

Employee Support

The PMSA will take action to ensure that an employee is not victimised or made the subject of reprisal or retaliatory action as a consequence of them reporting an allegation of harm or suspected harm.

The PMSA will also offer support for the victim and the individual against whom the allegations are made.

This commitment is evidence of the PMSA’s fulfilment of the requirements of section 3(1)(d) of the Regulation.

MANAGING BREACHES OF PMSA CHILD PROTECTION POLICIES

The PMSA is committed to appropriately managing breaches of this Child Risk Management Strategy in accordance with its other relevant policies as appropriate in the circumstances, such as its Child Protection Policy, Grievance Policy and Procedures, relevant Human Resources policies and Enterprise Bargaining Agreement.

The *PMSA Child Protection Policy* addresses consequences that may result when an employee at a PMSA school acts in contravention of their obligations under the Policy. Employee breaches of this Risk Management Strategy will also be managed in accordance with the processes associated with breaches of the Policy.

Any breaches of *PMSA Human Resources Child Protection Compliance Policy* will be managed under Section 7.2 - Handling Serious Misconduct or Professional Misconduct Policy.

This is evidence of fulfilment of the requirements of section 3(1)(e) of the Regulation.

RISK MANAGEMENT REPORTING AND REVIEW

The PMSA Education and Pastoral Care Committee has responsibility for the oversight relating to child protection matters. The primary objective of the Committee is to assist the PMSA Council in fulfilling its duty in relation to the safety and wellbeing of members of the PMSA school communities.

Risk Management Reporting

Compliance with Child Protection legislation and PMSA Child Protection Policy requirements, any
identified risks or incidences pertaining to child protection in individual schools and breaches of the PMSA Child Protection Policy and/or PMSA Child Protection Risk Management Strategy, are included in a Risk Management report provided by each PMSA School Council on a quarterly and annual basis respectively.

Incidents, risks or breaches of major significance, including criminal acts, are reported directly to the PMSA Councillors on a more urgent basis as they are identified. Consultation by the individual School Council Chairman and Principal with the PMSA Chairman to determine the trigger for such reporting is recommended.

Risk Management Review
The PMSA, in consultation with its schools, reviews its Child Protection Risk Management Strategy annually and after any incidents to ensure that risks continue to be addressed and minimised throughout PMSA schools and workplaces. The PMSA Child Protection Risk Management Strategy is also updated as necessary to ensure continued compliance with the Working with Children (Risk Management and Screening) Act 2000, and any other legislation which may, in the future be enacted in relation to child protection.
## APPENDIX 1

### Summary of Reporting Harm

<table>
<thead>
<tr>
<th>Who</th>
<th>What abuse</th>
<th>Test</th>
<th>Report to</th>
<th>Legislation</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>All staff</td>
<td>Sexual</td>
<td>Awareness or a reasonable suspicion</td>
<td>Principal, through to Police</td>
<td>EGPA, sections 366 and 366A</td>
<td>Unchanged</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Sexually abused or likely to be sexually abused</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Teacher</td>
<td>Sexual and physical</td>
<td>Significant harm</td>
<td>Principal, through to Child Safety</td>
<td>CPA, sections 13E and 13 G</td>
<td>New</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Parent willing and able</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>All staff</td>
<td>Physical, psychological, emotional, neglect, exploitation</td>
<td>Significant harm</td>
<td>Principal, through to Child Safety</td>
<td>Accreditation Regulations, section 10</td>
<td>Amended</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Parent willing and able</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Principal</td>
<td>Any</td>
<td>Not of a level that is otherwise reportable to Child Safety, refer without consent</td>
<td>Family and Child Connect</td>
<td>CPA, sections 13B and 159M</td>
<td>New</td>
</tr>
<tr>
<td>All staff</td>
<td>Any</td>
<td>Not of a level that is otherwise reportable to Child Safety, refer with consent</td>
<td>Principal, through to Family and Child Connect</td>
<td>CPA, sections 13B and 159M</td>
<td>New</td>
</tr>
<tr>
<td>Any member of the public</td>
<td>Any</td>
<td>Significant harm</td>
<td>Child Safety</td>
<td>CPA, section 13A</td>
<td>Unchanged</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Parent willing and able</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>