



**Catholic
Education**
Diocese of Cairns

Learning with Faith and Vision

Child and Youth Risk Management Strategy 2024



What is the Child and Youth Risk Management Strategy?

The Child and Youth Risk Management Strategy forms part of the Working with Children prevention and monitoring system administered by the Department of Justice and Attorney General Agency, Blue Card Services, which aims to create safe and supportive service environments for children and young people.

Under the provisions of the [Working with Children \(Risk Management and Screening\) Act 2000](#), and the [Working with Children \(Risk Management and Screening\) Regulation 2020](#) it is a requirement that regulated employers and businesses develop and implement risk management strategies to identify and minimise the risk of harm to children and young people in their service environment. Our schools and Colleges is one such service environment.

What are the Requirements of the Child and Youth Risk Management Strategy?

To meet our legislative obligations, the Child and Youth Risk Management Strategy includes eight minimum requirements under key areas of service delivery.

These are:

Commitment

1. A statement of commitment to the safety and wellbeing of children and the protection of children from harm.
2. A code of conduct for interacting with children.

Capability

3. Written procedures for recruiting, selecting, training and managing staff and volunteers.

Concerns

4. Policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines.
5. A plan for managing breaches of our risk management strategy.
6. Transparent risk management plans for high-risk activities and special events.

Consistency

7. Policies and procedures for managing compliance with the blue card system.
8. Implemented and modelled strategies for communication and support.

These eight mandatory requirements meet all 10 of the National Principles for Child Safe Organisations.

What Does the Child and Youth Risk Management Strategy Look Like?

Our schools and Colleges, supported by Catholic Education Diocese of Cairns (CEDC) meets these eight requirements through policies, procedures, and practices across several key areas, including, but not limited to:

- Our [Safeguarding Children and Young People Policy](#)
- Our [Student Protection Reporting Processes & Guidelines](#)
- Our [Code of Conduct for Staff](#)
- Our [Code of Conduct for Parents, Volunteers and Visitors](#)
- Our [Workplace Health and Safety Policy](#)
- Our [Student Positive Behaviour Support Policy](#) (under review)

REQUIREMENTS

1. A Statement of Commitment to The Safety and Wellbeing of Children and The Protection of Children from Harm

We are committed to providing safe, supportive, and respectful teaching and learning communities that promote student rights, safety and wellbeing, including compliance with child protection obligations mandated by law, the United Conventions on the Rights of the Child and Church teachings. We recognise that student spiritual, psychological, and physical wellbeing is paramount and recognise that every student has a fundamental right to a safe school environment and protection from harm and risk of harm.

2. A Code of Conduct

2.1 Employee Code of Conduct

We have a [Code of Conduct](#) for Employees which applies to all staff members and contactors, within CEDC, engaged on a casual, fixed term or continuing basis, either pursuant to a contract of employment or appointed to a role at the school pursuant to an agreement with a religious order.

The Code of Conduct states that our staff must always act appropriately and professionally in their interactions with students and observe appropriate boundaries, behaviour and contact with students. The Code of Conduct also covers expectations of staff in relation to risk management and duty of care obligations to students, including but not limited to compliance with laws, standards and CEDC policies and procedures.

2.2 Parents, Volunteers and Visitors Code of Conduct

We have a [Code of Conduct for Parents, Volunteers and Visitors](#) that defines their standards of conduct to ensure a safe learning environment for all students and staff. It relates to all parents, volunteers and visitors who interact within our school's, colleges and CEDC and applies to when present at school and school sponsored meetings/functions within and outside of school hours

2.3 Student Behaviour Support Policy (currently under review)

Our school's and colleges community is required to develop a Student Positive Behaviour Support Plan and implement procedures for a whole school approach to support student behaviour in the school

environment, involving all groups in the school community. This is published on the school public website. As defined in the [Student Positive Behaviour Support Policy](#), the plan reflects the shared values and expectations that guide our school's approach to student behaviour support and to maintaining a supportive Catholic school environment.

Our schools and colleges use Engage Student Support System to track the behaviour of students and proactively support students' behaviour through data-informed decision making. Our school is required to use the Engage Student Support System to document bullying/harassment incidents, alcohol and other drug related incidents, weapons incidents, and all suspensions (both in school and out) for a period of one day or more. Schools are required to note a part time suspension on the student's school file.

Staff working with children hold a special position of trust, care and authority with students. Staff are required to demonstrate clear professional boundaries in their interactions with students and ensure that they maintain appropriate physical, emotional and behavioural boundaries with students that are age and context appropriate. While our staff do work individually with students, no staff member is required to work in isolation with a student without visibility and transparency.

2.4 General Safety

The general safety of children and young people, not already covered within this document are detailed below within CEDC policies and procedures and are readily accessible to employees on the CEDC Intranet, Veritas

- Visibility in school process
- Playground Risk Management

2.5 Management of Complaints and Grievances

Catholic Education in the Diocese of Cairns is committed to safe, ethical, and legal workplaces based on the respectful and responsible behaviour of all members of our system and school communities. To assist with this, we have a Code of Conduct - Staff and Code of Conduct for Parents, Volunteers and Visitors.

All employees across the Diocese are responsible for the acceptance, management and/or investigation of complaints, grievances, and allegations of misconduct of employees, volunteers, clergy and religious.

As per the guiding principles all complaints will be dealt with at the lowest level. Depending on the seriousness of the allegation or incident the manager receiving the complaint will attempt to resolve the complaint or grievance informally in a manner that is acceptable to the complainant. This includes parental complaints, minor staff conflict and misconduct. Information about Conduct, Complaints and Grievances can be found via the CEDC public website.

3. A Recruitment, Selection, Training and Management

Recruitment processes within our school and supported by CEDC ensure a comprehensive practice is adopted when employing new staff that includes child safe processes embedded in the following:

1. Pre-Appointment

- Position Descriptions
- Selection Criteria
- Advertising the position.

2. Selection

- Interview Process
- Referee Checks
- Probationary period of employment.

3. Post-Appointment

- Training
- Induction program
- Ongoing staff management.

Employment Screening procedures include:

- Obtaining copies of Mandatory accreditation documentation
- Referee Checks (specific student protection questions and suitability to work with children)
- Structured interviews.
- Signed declaration:
 - Acceptance of the [Statement of Principles](#) and the [Code of Conduct](#)

3.1 Induction

All new staff members are provided with an induction upon commencement of duties. For our school staff, this process is undertaken through the guidance of the principal or delegate via an employee induction booklet.

It is also a requirement that all new staff members complete the following mandatory training as soon as practical once employment has commenced and annually after this:

- Student Protection Reporting Obligations.
- Code of Conduct
- Privacy Awareness
- Discrimination and EEO
- Fire Safety
- Sexual Harassment Prevention
- Acceptable Use of ICT including social media
- Workplace Bullying and Occupational Violence
- Disability Standards for Education.

3.2 Teaching Staff

All teachers in our school and colleges are registered with the [Queensland College of Teachers](#). Original certificates of registration and qualifications are sighted upon employment and copies are stored in the school and in the teacher's personnel file at CEDC. The Professional Standards and Safeguarding Office (also known as Professional Standards) additionally adhere to notification processes required by the [Education \(QLD College of Teachers\) Act 2005](#), where allegations or complaints occur resulting in an investigation of harm or possible harm to a student.

3.3 Non-Teaching Staff – No Card, No Start

All non-teaching staff are required to have a Working with children card (herein after referred to as a WWC card) issued by [Blue Card Services](#), in accordance with the [Working with Children \(Risk Management and Screening\) Act 2000](#), unless a working with children exemption applies. A working with children exemption applies to police officers and registered teachers.

Schools and colleges maintains a register of all volunteers and contractors WWC card details, including the card number and renewal date. Details of non-teaching employees' WWC cards are managed by CEDC within the Human Resources Administration department on a register and in each relevant individual's personnel file. New non-teaching employees must have applied for and received their working with children clearance prior to the commencement of work.

3.4 Restricted Employment

Restricted employment refers to the situations or exemptions that allow a person to work with children without a working with children check, such as if they are:

- A volunteer parent.
- A volunteer who is under 18
- Paid or unpaid staff who work in regulated child-related employment for not more than 7 days in a calendar year.
- A consumer at a child-related service outlet where they also carry out work at the outlet.

All other volunteers are required to possess a current WWC card prior to the commencement of work. The school and college maintain a register of all volunteers' WWC card details, including the number and renewal date.

In the case where a WWC card is not required, our school requires individuals to sign a Volunteer Suitability Declaration form which is kept on file at the school.

3.5 Restricted Person

A volunteer is prevented from volunteering in a school, including if they are a parent of a student, if they are a restricted person. A restricted person is a person who either:

- Has been issued a negative notice.
- Has a suspended Working with Children Card (previously referred to as a Blue Card)
- Is a disqualified person.
- Has been charged with a disqualifying offence that has not been finalised.

3.6 Non-School Organisation

There are a range of organisations that receive 'Non-School Organisation' state government funding to provide services to students with disabilities in the educational setting. These organisations have service agreements with Department of Education (DE), including school visit protocols, and are often referred to as NSO providers. These include:

- Autism Queensland
- CPL
- Vision Australia
- ACCIST (Cairns Catholic & Independent Schools Therapy)
- Hear & Say

These organisations provide services to students in our school over time operating as part of the educational team to improve educational outcomes for verified students with disabilities.

3.7 Third Party Providers – Onsite Therapy in Schools

If there is a request from third parties to use school facilities consideration is given to:

- The impact on learning and teaching due to the student's potential withdrawal from the classroom.
- How the support provided aligns with the educational goals of the student;
- The future likelihood of multiple service providers seeking access to multiple students and the impact this would have on school resources and interruption to learning and teaching.

Third Party Providers will only be provided to students in school time under the following extenuating circumstances:

- The principal in consultation with the school's Diverse Learning Team assesses that the intervention requested aligns with the educational goals of the student.

- The needs of rural and remote schools accessing service providers.
- If there is an agreement between the school and the provider to provide a service to a student, then a formal induction process is actioned by the school as detailed and guided by CEDC Education Services.

3.8 Additional staff resources

CEDC has available policies, processes and resources to support the pastoral care and wellbeing of students. These are readily accessible to employees on CEDC Intranet, Veritas.

Example policies and processes include:

- Sun and Heat Safety
- First Aid and Infection Control
- Weapons (including knives) in Schools Directive
- Transport of children
- Visitor Policy
- Students – use of information and communication technologies including social media
- Reconciliation Action Plan
- Inclusion of students who identify as gender diverse and/or intersex
- Student Wellbeing policy
- School Uniform policy
- Inclusive practices
- Students in out-of-home care (OHCC)
- Managing cyclonic events
- Student Bullying – Prevention and Responses in Schools Policy
- Drugs (illicit and unsanctioned substances) in Catholic schools
- Alcohol – Use in schools and on school related activities
- Responding to unacceptable student behaviour (Time out, Detention, Suspension, Change of School, Exclusion)
- Restrictive Practices Policy and Procedures
- Critical Incidents
- School Student Supervision
- Gifted and Talented Education
- First Nations Education
- Privacy Policy
- Privacy Act – Data Breach Protocols
- Student Attendance
- Critical Incidents and Emergency Planning

4. Policies and Procedures for handling disclosures or suspicions of harm, includes reporting guidelines

4.1 Student Protection Processes

All school staff are required to follow the procedures set out in the [Student Protection Processes and Guidelines](#) document in relation to reporting:

- Suspected/likely sexual abuse of a student to QLD Police Service.
- Reportable suspicion of physical or sexual abuse of a child to the department responsible for

Child Safety (where there may not be a parent able and willing to protect the child).

- Reasonable suspicion of neglect or emotional abuse of a child to the department responsible for Child Safety (where there may not be a parent able and willing to protect the child).
- Suspected Child Sexual Offence (a belief on reasonable grounds that a child under the age of 16yrs has been sexually offended against by an adult and the reporting of this matter has not been captured under existing reporting obligations as detailed above);
- Inappropriate behaviour by a staff member, other employee or volunteer towards a student/s.

The Student Protection Processes and Guidelines document includes the following information:

- Harm definition
- Indicators of harm (or other concerns for a student's wellbeing)
- Reasonable suspicion of harm definition
- Identification, reporting and recording a disclosure or reasonable suspicion of harm
- Mandatory reporting obligations
- Non-mandatory reporting obligations
- Failure to report and failure to protect criminal offences
- Guidance to respond to concerns for a student's wellbeing that do not meet a threshold for a report to a statutory authority.

These procedures meet the legislative requirements of the [Education \(General Provisions\) Act 2006](#), [Child Protection Act 1999](#) and the [Education \(Accreditation of Non-State Schools\) Regulation 2017](#).

If a disclosure or suspicion of harm relates to inappropriate behaviour of a employee, a volunteer or other personnel, at the school towards a student or other child, the staff member must make a written report of the concerns to the Principal. The Principal must then consult with the PSSO and depending on the severity of the concerns a decision will be made as to who is best placed to respond to the concerns.

The PSSO provided training for employees on how to respond to disclosures and suspicions of harm via mandatory online and face to face training annually.

The school has available supports, if required, for students, families, and staff if they are impacted upon by a disclosure or suspicion of harm. It may be appropriate that such supports are provided through the school or CEDC resources, or external supports may be required.

4.2 Student Protection Contacts in Schools

Under the Education (Accreditation of Non-State Schools) Regulation 2017 (Section 16(3)), schools administered by have at least two nominated staff members to whom a student can report behaviour of another staff member that the student.

considers inappropriate. The names of these Student Protection Contacts are made known to staff, students and parents and are published on the CEDC public website, in parent newsletters and in posters placed prominently around the school site. A central register is maintained by CEDC and updated regularly.

4.3 Student Protection Officers in PSSO

Student Protection Officers are a support resource for our school and have expertise in the field of risk assessment and risk management, child protection and staff professional standards. This team:

- Assists our school-based employees to identify whether there is a reasonable suspicion of abuse, harm and/or staff other inappropriate behaviour towards a student.
- Offers support and guidance during and after a matter involving student protection and/or staff inappropriate behaviour.

- Assists our school-based employees to appropriately refer families to support services or report to Department of Child Safety or the Queensland Police Service Develop
- Facilitate professional learning for our school-based employees.

5. A plan for managing breaches of the risk management strategy

For the purposes of this strategy, a breach is any action or inaction by a staff member within our school that fails to comply with any part of the Child and Youth Risk Management Strategy. Allegations of breaches of the Child and Youth Management Strategy are managed under the principles of procedural fairness and natural justice via the [Guiding Principles – Managing unacceptable workplace behaviour](#).

Breaches of the strategy are managed in alignment with management of breaches of the [Code of Conduct](#) and [Student Protection Processes and Guidelines](#).

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

A planning process for High-Risk Activities and special events foreseen as high-risk activities conducted within our school is broadly arranged into the following types of activities and associated control measures:

6.1 Curriculum Activity

We use and comply with the Curriculum Activity Risk Assessment (CARA) as a minimum standard for risk management of curriculum activities and acknowledge the sharing of resources by the Queensland Department of Education in this area.

Our procedure supports the safe delivery of the curriculum outlining:

- The responsibilities of staff and
- The process for curriculum activity risk management when conducting curriculum activities in schools and other locations.

The CARA process includes the following:

1. Identifying risks and hazards in context

- Which students will be involved?
- Where will the students be?
- What will students be doing?
- What will students be using?
- Who will be leading the activity.

2. Assessing the risks in context

- Assessing the likelihood of an incident happening and,
- The consequence if it did happen.

3. Allocating an inherent risk level for the activity

4. Determining the control measures

5. Implementing the control measures

6. Reviewing the control measures.

Schools and colleges regularly undertake risk assessments which include, but not limited to:

- Adequate supervision of students
- Supervision arrangements
- Playground supervision
- Drop Off and collection of children.

- Procedure followed in the event a child is not collected.
- Procedure to be followed in the event a person responsible for the collection.
- of a child is deemed unable (for example, intoxication)
- Emergency and critical incidents
- Fire/Lockdown incidents
- Engaging with and managing Visitors/Outsiders
- Use of Media/Communications
- Use of Computer/Internet
- Guidance Counselling Services
- Transport of students by staff
- Transporting of students by students
- Injuries, allergies or illnesses

CEDC has available policies, processes and resources to support the risk management of high risk activities and events. These are readily accessible to employees on CEDC Intranet, Veritas.

- Excursions and School Camps
- Overseas Excursions
- Homestays
- Fêtes and Events

7. Policies and procedures for managing compliance with the Blue Card system

As per the requirements with the [Working with Children \(Risk Management and Screening\) Act 2000](#), Employee Blue Cards are monitored through the Blue Card Registers at the school level, and through the Blue Card Register maintained through Catholic Education Services. Monitoring of Blue Card status is ongoing, with communication between Catholic Education Services and our school to ensure the appropriate renewal and application processes are followed. Further information regarding Blue Card requirements and processes can be obtained from the QLD Government [Blue Card Services](#) website.

7.1 Identification of Who Requires a Working with Children Card or Working with Children Exemption

It is important to recognise that working with children clearance requirements do not apply to every environment in which a child may be present. The working with children system is structured so that organisations providing services which are essential to children's development and wellbeing, such as childcare, education, sport, and cultural activities, are captured. Further information in relation to who requires a WWC card can be sourced from the [Blue Card Service](#) website.

7.2 Contact Person

There is at least one designated contact person in our school who is responsible for:

- Managing Working With Children cards and Working with Children exemptions
- Listed as the contact person in the working with children card application form
- The person who [Blue Card Services](#) will send notifications to and
- The only person [Blue Card Services](#) can discuss a staff member's or working with children card status with unless additional authorisation is provided.

7.3 Managing Working With Children Card Applications

All applicants are informed that by signing the application form they are consenting to the screening process. The school ensures that the authorised contact person has certified and sighted documents to

confirm an employee's identity as prescribed under the Act. Applications are carefully checked to ensure all sections have been appropriately completed and are aware that paid employees' volunteers and trainee students must not commence regulated employment until they hold a valid WWC card and WWC clearance.

We explicitly warn potential staff (paid employees, volunteers, and students) that it is an offence for a 'disqualified person' to sign a working with children card application form, or renewal form.

7.4 Managing Existing Working With Children Card Holders

If a person joins a school and already has a Working With Children card, there are processes in place to:

- Verify the validity of the WWC card, AND
- If the person holds a paid WWC card lodge *an Authorisation to Confirm a Valid Card/Application* form with [Blue Card Services](#). This will ensure that our school receives important notifications in relation to the WWC card holder, including that the card has been cancelled or suspended.

If a person holds a volunteer WWC card and will be undertaking paid employment in our school, a **Volunteer to Paid Transfer** form is lodged with [Blue Card Services](#). This will transfer their card from volunteer to paid status and will ensure that we receive important notifications in relation to the WWC card holder, including that the card has been cancelled or suspended.

If a person cease working with us, we lodge an **Applicant/Cardholder No Longer With Organisation form** to advise [Blue Card Services](#) immediately.

7.5 Managing Changes in Police Information

Staff and volunteers understand their obligation to advise the school if there is a change in their police information. Staff and volunteers are not required to disclose the specific nature of the change, only that a change has occurred, and we have processes in place to ensure that a **Change in Police Information Notification** is submitted to [Blue Card Services](#)

7.6 Managing High-Risk Individuals

Processes are in place for managing notifications from [Blue Card Services](#) in relation to high-risk individuals, for example:

- An employee receives a negative notice or is a known disqualified person, or
- An employee has their blue card or exemption card cancelled or suspended,
- Or An employee has their WWC card application withdrawn, or
- A notification in relation to a serious change in criminal history is received from [Blue Card Services](#).

7.7 Employee Register

As part of our Child and Youth Risk Management Strategy, our school has established and maintained an employee register which is a written record of contractors and volunteers involved in child-related activities within the school environment.

It includes:

- Whether the person requires a WWC card or exemption (if not, why not – e.g., an exemption applies under the Act)
- The type of WWC card (e.g., paid or volunteer) or WWC exemption.
- Whether the person applied and/or the date of issue of the positive notice and blue/exemption card
- The WWC card or exemption card number and the expiry date of the WWC card and
- The renewal date for the WWC card.

Any employees or volunteers that enter our school with a WWC card, will have their card verified with [Blue Card Services](#).

If an employee has had a card cancelled or suspended or receives a negative notice after a change in police information, we ensure the employee does not continue to undertake child-related work within our organisation (work that is regulated by the Act).

7.8 General

7.8.1 Additional Records

We ensure that appropriate and confidential records in relation to the following are maintained:

- Whether a negative notice has been issued
- Any change in status to a WWC card or exemption card (such as a change in police information, or the cancellation or suspension of a WWC card or exemption)
- Where there is a change in police information, the date [Blue Card Services](#) was informed of the change
- Where an employee leaves the school the date [Blue Card Services](#) was informed, and
- Any change to the employee's/volunteer's personal information, including the date they informed [Blue Card Services](#).

7.8.2 Annual Review of CYRMS

An annual review of the Child and Youth Risk Management Strategy is also undertaken including the consideration of:

- Whether policies and/or procedures were followed in responding to child protection matters
- Whether any incidents occurred relating to children and young people
- The actual processes used to manage incidents.
- A review after an incident where a child has been harmed or is at risk of harm or a breach of the strategy has occurred.
- The effectiveness of the policies and procedures in preventing or minimising harm to children and young people and
- The content and frequency of training in relation to the Child and Youth Risk Management Strategy.

8. Strategies for communication and support

To ensure awareness for staff, students and families around the Child and Youth Risk Management Strategy, the following is actioned:

- Provision of a publicly available Child and Youth Risk Management Strategy, Safeguarding Children and Young People Policy and Student Protection Processes and Guidelines on each school website.
- Training and Professional Development for staff, including but not limited to Annual Mandatory Student Protection Reporting Obligations and the Annual Code of Conduct.

These resources and strategies are continually reviewed to ensure optimal communication and awareness.

8.1 Implementation Responsibilities for Schools

To comply with the Child and Youth Risk Management Strategy, our school follows and implements the requirements as detailed within this document with the assistance of Catholic Education Services, including:

- Ensuring that all relevant policies and procedures are followed, for example the Student Protection Reporting Processes and Guidelines
- Ensuring that all school staff receive training and guidance in applicable areas.
- Ensuring that risk management plans are developed and implemented for all high-risk activities.

APPENDIX A: DEFINITIONS

Disqualifying Offence

A table listing the disqualifying offences is available on the [Blue Card Services](#). This list is not exhaustive, and some may only be considered disqualifying offences if committed against a child. An offence is categorised as a disqualifying offence under the Act if it is an offence:

- Against a provision of an Act detailed in the list of disqualifying offences
- Under a law of another jurisdiction that, if it had been committed in Queensland, would have constituted an offence of a kind detailed in the list of disqualifying offences.
- Of counselling or procuring the commission of an offence of a kind mentioned in the list of disqualifying offences
- Of attempting, or of conspiring, to commit an offence of a kind detailed in the list of disqualifying offences.
- That has, as an element, an intention to commit an offence of a kind mentioned in the list of disqualifying offences or
- That, at the time it was committed, was an offence of a kind mentioned in the list of disqualifying offences.

A full list of disqualifying offences can be viewed by clicking on the link below:

[List of disqualifying offences](#)

Disqualified Person

A person is disqualified from applying for a WWC card if they:

- Have been convicted of a disqualifying offence which includes:
 - Having sex with a child (regardless of the type of relationship, e.g., teenage boyfriend/girlfriend, unlawful carnal knowledge)
 - Other child related sex or pornography offences
 - Murder and other serious sexual or violent offences against an adult or children (regardless of the penalty and regardless of when and where it occurred.)
- Are a reportable offender with current reporting obligations under the [Child Protection \(Offender Reporting and Offender Prohibition Order\) Act 2004](#)
- Are subject to a child protection offender prohibition order under the [Child Protection \(Offender Prohibition Order\) Act 2008](#)
- Prohibited by a court from applying for or holding a blue card or
- Are subject to a sexual offender order under the [Dangerous Prisoners \(Sexual offenders\) Act 2003](#)

Restricted Person

A restricted person is a person who either:

- Has been issued a negative notice or
- Has a suspended blue card or
- Is a [disqualified person](#) or
- Has been charged with a [disqualifying offence](#) that has not been finalised.

Restricted Employment

Restricted employment refers to the situations or exemptions that allow a person to work with children without a WWC card, such as if they are:

- A volunteer parent.
- A volunteer who is under 18
- Paid or unpaid staff who work in regulated child-related employment for not more than 7 days in a calendar year.
- A consumer at a child-related service outlet where they also carry out work at the outlet.
(A child-related service outlet is a place where disability services are provided to children)