PART 1: COMMITMENT

Statement of Commitment (mandatory requirement 1)

Holy Cross School is committed to the safety and wellbeing of all students. Holy Cross School respects and values the dignity, self-esteem and integrity of every child and young person, based on our Christian belief that every person is made in the image of God and children and young people are entrusted to us by the love of God.

Our Vision and Mission clearly commit our community to quality relationships and safe and supportive learning environments.

Holy Cross’ Child and Youth Risk Management Strategy has been developed in compliance with our obligations under the Working with Children (Risk Management and Screening) Act 2000 and the Working with Children (Risk Management and Screening) Regulation 2011 to promote and protect children and young people. Holy Cross Primary School is a systemic Catholic School in the Archdiocese of Brisbane which is administered by Brisbane Catholic Education (“BCE”).

Codes of Conduct (mandatory requirement 2)

BCE has developed codes of conduct and standards of behaviour for employees, students, volunteers (including parents) and other personnel in consultation with relevant parties. These codes of conduct set out BCE’s requirements in relation to the conduct of employees who work at Holy Cross School together with students, volunteers and other personnel at the school.

BCE employees who work at Holy Cross School are also bound to comply with BCE’s Statement of Principles for Employment in Catholic Schools and other relevant professional standards (for example, the Australian Professional Standards for Teachers and the Australian Professional Standards for Principals which describes effective, contemporary practice for teachers and principals).

BCE Employee Code of Conduct

The Catholic Education Archdiocese of Brisbane Code of Conduct (“Code of Conduct”) sets out the standard of behaviour required of BCE employees working at Holy Cross School. All BCE employees must comply with the Code of Conduct. It forms part of the contract of employment for all persons employed by BCE, including on a temporary, casual, fixed term or continuing basis.

The Code of Conduct states that BCE employees must behave professionally at all times in their interactions with students and observe appropriate boundaries, behaviour and contact with students. In addition, the Code of Conduct covers the employees’ duties in relation to risk management and duty of care obligations to students.
The Code of Conduct is uploaded on BCE’s Intranet (KWeb). The Principal at Holy Cross School conducts Code of Conduct training for school employees at the time of induction for all new staff and at least biannually for all other staff, and where appropriate, uses the training materials provided by BCE.

**Student Behaviour Support Policy**

Holy Cross School has developed a Student Behaviour Support Plan for the school, known as **Behaviour for Learning** in consultation with all groups in the school community and in accordance with BCE’s Student Behaviour Support Policy. The Student Behaviour Support Plan has been implemented for a whole school approach to support student behaviour in the school environment.

Holy Cross Student Behaviour Support Plan reflects the shared values and expectations of the school to student behaviour support and encourages a supportive Catholic school environment. The Student Behaviour Support Plan includes a student code of behaviour which is guided by BCE’s Student Behaviour Support Policy. The Student Behaviour Support Plan is readily accessible to students and parents and is uploaded on the Holy Cross’ Intranet/Website.

**Volunteer Code of Conduct**

BCE has developed a Volunteer Code of Conduct which outlines the standard of behaviour which is required of volunteers (including parents) in their activities in the school, including the need to think and act safely and treat students and staff with respect.

Holy Cross School takes the following actions to ensure that the BCE Volunteer Code of Conduct is implemented in the school community:

- all volunteers are given a copy of the Volunteer Code of Conduct;
- all volunteers are required to comply with the Volunteer Code of Conduct to continue their voluntary engagement at the school;
- all volunteers have completed Student Protection Training via the PowerPoint for Volunteers; and
- all volunteers must sign the Volunteer Register Sheet.

**Other Personnel Code of Conduct**

BCE has developed an Other Personnel Code of Conduct which outlines the standard of behaviour which is required of other personnel in their activities in the school, including the need to think and act safely and treat students and staff with respect. Other personnel includes music instructors, art instructors and sports coaches who use our school’s property and facilities in order to provide services or instruction to students, but who are not BCE employees.

Holy Cross takes the following actions to ensure that the BCE Other Personnel Code of Conduct is implemented in the school community:

- all other personnel are given a copy of the Other Personnel Code of Conduct;
- all other personnel are required to comply with the school’s Other Personnel Code of Conduct to continue their activities and instructions at the school;
- all other personnel have completed Student Protection Training via the PowerPoint for Other Personnel; and
- all other personnel must sign the Other Personnel Register Sheet.
**PART 2 - CAPABILITY**

**Procedures for recruiting, selecting, training and managing staff that enhance the safety and wellbeing of children and young people and the protection of children and young people from harm (mandatory requirement 3)**

**Recruitment and selection**

Holy Cross School aims to recruit and select employees that work with students in the school that are appropriately qualified and suitable for working with children and young people.

Holy Cross School is responsible for staff recruitment, selection, training and management of employees in the school in partnership with personnel from the BCE office.

Principals and employees involved in staff recruitment, selection, training and management of employees at the school must comply with the relevant BCE policies which are published on the BCE Intranet and include:

- Recruitment, Selection and Appointment of Teachers Procedure
- Recruitment, Selection and Appointment of Brisbane Catholic Education Office Staff
- Recruitment, Selection and Appointment of Middle Leaders
- Recruitment, Selection and Appointment (Acting Senior Leadership Positions in Schools)
- Recruitment, Selection and Appointment of P – 12 Heads
- Recruitment, Selection and Appointment of DPs, APs and APREs
- Recruitment, Selection and Appointment of Principals

In advertising new positions for the school, the advertisement states that “This position involves working with children. The appointment of a successful applicant will be subject to satisfactory employment screening for child related employment in accordance with the law”.

Holy Cross School adheres to BCE’s policies and procedures in relation to employment which are contained in the *Working with Children (Risk Management and Screening) Act 2000, Working with Children (Risk Management and Screening) Regulation 2011, Education (Accreditation of Non-State Schools) Act and Regulation 2001*, and the *Education (Queensland College of Teachers) Act 2005*.

All non-teaching employees working at Holy Cross School are required to comply with BCE’s Blue Card Screening Procedures (discussed below). All non-teaching employees, volunteers and trainee students who work with students and who require a Blue Card under the *Working with Children (Risk Management and Screening) Act 2000*, are required to obtain a Blue Card and keep it current. All teachers are required to produce evidence of current teacher registration with the Queensland College of Teachers (“QCT”) before they commence work at Holy Cross School.

**Training and Management of Employees**

The Principal is required by BCE to ensure that all new BCE employees at Holy Cross School are provided with induction training on the school’s processes and procedures, the values and expectations of BCE and the standard of behaviour required of employees in their interactions
with students, to support BCE and Holy Cross School to provide an environment that is safe and supportive for students.

All staff at Holy Cross School must complete mandatory online training in BCE’s Student Protection Processes, once every two years. Student protection training covers BCE’s requirements under the Student Protection Processes in relation to reporting by staff of suspicions or allegations of:

- sexual abuse/likely sexual abuse of students;
- harm or risk of harm to students caused by physical abuse, sexual abuse, emotional abuse or neglect; and
- inappropriate behaviour of staff to students.

This training provides our staff at Holy Cross School with strong skills to effectively respond to and report suspicions or allegations, as required by law. In the alternate year, face to face refresher training for staff is conducted by the Principal at Holy Cross School. New employees must complete this training within four weeks of commencing work at the school.

Additional on-going training is provided by BCE and employees at the school are encouraged to attend. BCE has a dedicated Professional Learning Team which co-ordinates professional learning opportunities for BCE employees to enable BCE employees to enhance their professional or personal knowledge and skills. Holy Cross School encourages its staff to attend professional learning courses. Many of the courses offered to employees relate to the safety and wellbeing of students. For example, courses are offered from time to time on bullying at schools, behaviour management of students, students at risk of harm and students with special needs.

Where there is a complaint or allegation in relation to an employee of inappropriate behaviour, unsatisfactory performance or misconduct, the Principal (or in some cases, the Area Supervisor or the Employee Relations Team at the BCE office) will take all appropriate management action, which may include requiring employees to undertake additional training, mentoring employees, explaining BCE’s and the school’s expectations and requirements to the employee or dismissal.

BCE provides the Employee Assistance program to give free and confidential counselling to employees at the school who require support.

**Other BCE Support for Student Wellbeing**

Holy Cross School recognises that students learn best in school environments in which they feel safe, both physically and emotionally. BCE has developed a number of policies, processes and resources to support the pastoral care and wellbeing of students at Holy Cross School. These are readily accessible to BCE employees on BCE’s Intranet. The Principal at Holy Cross School provides informal training, from time to time, at staff meetings and ‘in service’ days, so that employees at the school are aware of these policies.

These policies and processes include:

- Preventing and Responding to Student Bullying in Schools Policy
- Management of Drug Related Incidents in Schools
- Management of Police Interventions in Schools
- Management of Weapons in Schools Guideline
- Suicide Prevention Guideline
- Students with Disabilities Policy
• Student Attendance Policy and Guidelines
• Manual Handling – the Handling of Students Policy
• Administration of Medicine to Students Policy
• Positive Behaviour for Learning

BCE has a Student Wellbeing Team which supports Holy Cross School in the care and wellbeing of students at the school and develops strategies, policies and procedures to assist the school and students. Holy Cross School employs a School Guidance Counsellor to work with students and provide pastoral care, personal safety strategies, support for marginalised students and support for students who may be at risk of being harmed.

PART 3 - CONCERNS

Policies and procedures for handling disclosures or suspicions of harm (mandatory requirement 4)

Student Protection Processes

BCE’s Student Protection Processes provide a process for all staff who work at Holy Cross to recognise, respond and report allegations or suspicions of:
• sexual abuse/likely sexual abuse of students;
• harm or risk of harm to students caused by physical abuse, sexual abuse, emotional abuse or neglect; and
• inappropriate behaviour of staff to students.

The Student Protection Processes have been developed in accordance with the requirements of the Education (Accreditation of Non-State Schools) Act and Regulation 2001, the Education (General Provisions) Act and Regulation 2006, the Working with Children (Risk Management and Screening) Act 2000 and Working with Children (Risk Management and Screening) Regulation 2011, the Child Protection Act 1999 and the Education (Queensland College of Teachers) Act 2005.

The Student Protection Processes are also underpinned by the Archdiocese of Brisbane Catholic Education Council’s Student Protection Policy (2011) and complements the procedures developed by the National Committee for Professional Standards entitled Towards Healing – Principles and Procedures in Responding to Complaints of Abuse Against Personnel of the Catholic Church in Australia (2010) and the document entitled Integrity in the Service of the Church (September 2011).

Reports may be made to the Queensland Police Service in relation to allegations or reasonable suspicions of sexual abuse/likely sexual abuse of a student or to the Department of Communities, Child Safety and Disability Services for harm/risk of harm to a student caused by sexual abuse, physical abuse, emotional abuse or neglect. If a report is made in relation to inappropriate behaviour of a staff member towards a student, that report will be handled by the Principal, with support from BCE’s Professional Standards and Student Protection Team. All school based employees must complete mandatory on-line training on BCE’s Student Protection Processes every two years. The Principal must sign off that this mandatory training has been
completed. Face to face refresher training is provided to staff in the alternate year to school based employees.

The Student Protection Processes are readily available for employees, parents, students and carers and Holy Cross School has uploaded the link to the Student Protection Processes on their school website.

BCE has processes to enable staff at Holy Cross School to complete on-line a Record of Concern about any student wellbeing concerns, including allegations or suspicions of sexual abuse or likely sexual abuse of a student, harm or risk of harm to a student or inappropriate behaviour of a staff member towards a student.

BCE has developed a complaints procedure to enable parents or students at Holy Cross School to make a complaint that the school has not complied with the Student Protection Processes. Parents or students may make a complaint via the Record of Complaint about Non-Compliance with BCE’s Student Protection Processes. The Principal or Area Supervisor will handle these complaints in accordance with BCE’s Procedure for Handling Complaints about Non-Compliance with BCE’s Student Protection Processes.

**School Student Protection Contacts**

In accordance with the *Education (Accreditation of Non-State Schools) Regulation 2001*, Holy Cross School has three stated staff members to whom a student can report behaviour of another staff member that the student considers is inappropriate.

The Principal is a Student Protection Contact at the school. The other Student Protection Contact is a staff member at the school. The role of the Student Protection Contact is to receive complaints and allegations from staff and students and to make or assist staff to make all reports as outlined in BCE’s Student Protection Processes. The identity of the Holy Cross School Student Protection Contacts is made known to staff, students, volunteers and parents through the school website, school newsletters, posters in the school and/or parent information nights.

Information about the Student Protection Contacts and requirements for their appointment is detailed within the Student Protection Processes.

**Student Protection Officers**

BCE has a Student Protection Team and Student Protection Officers working in this team are experts in the field of child protection. They all hold a degree in human services (generally social work) and have significant experience working in child protection.

Student Protection Officers assist our school based employees in assessing sexual abuse and likely sexual abuse and harm caused or at a risk of being caused to students by sexual abuse, physical abuse, emotional abuse or neglect. They also offer support and guidance to Holy Cross School during and after a student protection intervention, assist with compliance with the Student Protection Processes and develop and facilitate professional learning for staff.

**A plan for managing breaches of the Child and Youth Risk Management Strategy (mandatory requirement 5)**

BCE and Holy Cross School takes any breach of the BCE Child and Youth Risk Management Strategy or the Holy Cross School Child and Youth Risk Management Strategy seriously. Breaches may be dealt with as follows:
• if the alleged breach relates to the actions of an employee, this will be managed, as appropriate, in accordance with its School Employee Misconduct Process, Office Employee Misconduct Process, Office Employee Unsatisfactory Performance Process or School Employee Unsatisfactory Performance Process;
• if the alleged breach relates to a report of inappropriate behaviour of a staff member to a student, this will be managed in accordance with the process set out in the Student Protection Processes;
• if the breach relates to a complaint made via the Record of Complaint about Non-Compliance with BCE’s Student Protection Processes, that complaint will be dealt with in accordance with the Procedure for Handling Complaints about Non-Compliance with BCE’s Student Protection Processes;
• if the breach relates to the actions of a volunteer, this will be dealt with in accordance with the Volunteer Code of Conduct and the procedures set out in the Student Protection Processes, as appropriate;
• if the breach relates to the actions of other personnel, this will be dealt with in accordance with the Other Personnel Code of Conduct and the procedures set out in the Student Protection Processes, as appropriate; and
• if the breach relates to the action of a contractor this will be managed in accordance with BCE’s contract with the contractor.

A risk management plan for high risk activities and special events *(mandatory requirement 7)*

**Risk Management Tools**

Holy Cross School considers all curriculum activities in terms of their inherent level of risk. When undertaking a medium or high risk activity or special event, our school is responsible for identifying potential risks and considering the safety and wellbeing of students and the risk of harm to students.

Holy Cross School develops and implements an effective risk management plan to remove or minimise the risk of harm to students. The plan includes risk assessments and risk mitigation which are carried out for all medium or higher risk activities undertaken within the school and all activities undertaken outside of the school. Holy Cross School refers to information in relation to risk assessments for various activities and risk assessment tools provided on BCE’s Health and Safety Portal on the BCE Intranet.

The Health and Safety Team at BCE provides support to our school, if requested, to help us carry out risk assessments and develop and implement a risk management plan. In addition, a dedicated Workplace Health and Safety Officer ("WHSO") is employed at Holy Cross School (who is required to complete a Certificate 4 in Workplace Health and Safety within 12 months of commencing the role). The WHSO’s role is to co-ordinate risk assessments at our school and support the Principal in carrying out the health and safety responsibilities under legislation. BCE provides training and updates to the WHSO.

BCE has developed a Contractor Induction Manual to give contractors information on BCE’s Workplace Health and Safety Contractor Management System at BCE schools, so that contractors working at Holy Cross School play their role in maintaining a safe environment for students.
Risk Management for Excursions and Fetes

The Principal is responsible for approving all excursions. The Principal has reference to BCE forms and fact sheets to assist in identifying, assessing and managing risks associated with excursions, for example, the BCE OH & S Fact Sheet: Excursions, OH & S Standard - Risk Management Form and the Risk Assessment Template Form. The Principal completes the Risk Assessment Template Form prior to each excursion. This form specifies that in carrying out a risk assessment, student protection risks must be assessed and managed.

The Principal completes the BCE Fete Safety Planning Checklist prior to a fete taking place. This Fete Safety Planning Checklist assists the Principal in managing the health and safety risks of conducting a fete. The Principal accesses links to relevant information provided on BCE’s Health and Safety Portal, to assist in the risk assessment and management process, including the Fireworks Checklist, Amusement Devices Checklist, Contractors Workplace Health and Safety Agreement and information on the hygienic handling of food.

Other Strategies to Minimise Risks of Harm

Holy Cross School takes seriously its commitment in relation to the safety and protection of students. BCE has developed policies and procedures to manage risks of harm to students, which our school complies with, for example:

- **Supervision** – Holy Cross School manages the supervision of students appropriately to ensure that there is adequate supervision of students as detailed in the Code of Conduct.

- **Emergency** – Holy Cross School ensures that all employees are briefed to appropriately handle emergency situations and critical incidents in accordance with BCE’s Procedures for Responding to Critical Incidents.

- **Fire/Lockdown** – Holy Cross School ensures that all employees and volunteers are made aware of fire evacuation and lockdown procedures at the school.

- **Visitors/Outsiders** – Holy Cross School has procedures in place for the management of visitors and other outsiders, including relevant signage and directions, together with a visitor sign in register and procedures for signing in and out of the school.

- **Media/Communications strategies** – Holy Cross School obtains the permission of parents (using the Consent Form, All Forms of Media and Communications) for the use of student photographs and names in any materials issued to the public in printed or electronic form. Identifying information of students is not used in promotional material without the specific permission of the parents and the students concerned. Holy Cross School obtains the specific informed consent of parents for any publication of names and photos of students in the media outside the local school.

- **Computer/Internet** - All employees and students at Holy Cross School are required to observe the Brisbane Catholic Education Email, Internet and Intranet Acceptable Use Statement. Holy Cross School implements the BCE Acceptable Use of Computer and Internet Resource Consent Form in the school.
PART 4: CONSISTENCY

Policies and procedures for compliance with Chapter 8 of the *Working with Children (Risk Management and Screening) Act 2000* (which regulates the Blue Card system) *(mandatory requirement 6)*

**Blue Card Requirements and Employee Register**

Holy Cross School complies with BCE’s Blue Card Screening Procedure which details BCE’s requirements in accordance with the *Working with Children (Risk Management and Screening) Act 2000* to ensure that the required personnel hold a Blue Card.

All employees, volunteers and trainee students who work at Holy Cross School with children under 18 years of age are required by our school to obtain and hold a Blue Card (unless exempt), including:

- all school based BCE employees who are not registered with either the QCT or the Australian Health Practitioner Regulation Agency;
- volunteers (who are not parents of enrolled children);
- preservice teachers undertaking practical teaching sessions as part of compulsory academic course requirements;
- self-employed people, paid employees and volunteers whose usual duties include, or are likely to include, the teaching, coaching or tutoring of a child, individually on a commercial basis;
- students who undertake formal traineeships as part of their studies which involve work in child related employment, including conducting sport and recreation activities directed at children; and
- school board members (excluding current parents on a board at their own child’s school).

A centralised register of Blue Card information for all paid employees, unless exempt, is maintained by BCE. Holy Cross School provides Blue Card information to the BCE office when an employee, unless exempt, is engaged. Holy Cross School ensures that details of any Blue Card renewals, applications and changes in status are also forwarded to the BCE office.

All teachers employed by BCE must be registered with the QCT. The Principal of Holy Cross School sights the original certificates of registration and qualifications before employment commences at the school. The Principal ensures that new non-teaching employees must have applied for a Blue Card prior to commencing work at the school.

Holy Cross School maintains a register of Blue Card information for all volunteers, unless exempt. Volunteers who require a Blue Card under the *Working with Children (Risk Management and Screening) Act 2000* must obtain the Blue Card before commencing work.

**Procedures for reviewing the Child and Youth Risk Management Strategy**

To ensure that Holy Cross School Child and Youth Risk Management Strategy remains current and effective, this strategy will be monitored and reviewed annually. In the event that Holy Cross School identifies concerns, particularly following an incident, Holy Cross School’s Child and Youth Risk Management Strategy will be reviewed.
Issues to be considered in the review include:

- whether BCE and school policies and procedures were followed;
- whether any incidents relating to children and young people’s risk management issues occurred;
- the actual process used to manage any incidents;
- the effectiveness of BCE’s and Holy Cross School’s policies and procedures in preventing or minimising harm to children and young people; and
- the content and frequency of training in relation to BCE’s or Holy Cross School’s Child and Youth Risk Management Strategies.

Following the review, employees, parents and volunteers at Holy Cross School will be advised of any changes to BCE’s or Holy Cross School’s policies and procedures as a result of the review and where appropriate, training will be provided.

**Strategies for communication and support (mandatory requirement 8)**

**Student Protection Training**

As discussed above, all staff working at Holy Cross School must complete mandatory on-line training on BCE’s Student Protection Processes. The Principal is required to sign off that every staff member has completed the course.

BCE’s Student Protection Processes are readily accessible to parents, students and staff at Holy Cross and parents, students and staff are made aware of the processes and the process for reporting behaviour of a staff member that a student considers to be inappropriate. The Principal ensures that the ‘Recognise React Report’ posters are displayed prominently in areas of the school frequented by students.

**Training on the Child and Youth Risk Management Strategy**

Holy Cross School’s Child and Youth Risk Management Strategy is uploaded on the school’s website. The Principal implements and communicates Holy Cross School’s Child and Youth Risk Management Strategy to parents, employees, volunteers and other personnel by:

- placing the Child and Youth Risk Management Strategy on the school’s website; and
- providing training to the school’s employees by giving details on Holy Cross School’s Child and Youth Risk Management Strategy and BCE’s Child and Youth Risk Management Strategy.