



By  
Language  
Disorder  
Australia.

## CHILD RISK MANAGEMENT STRATEGY

|                            |                                    |  |                   |
|----------------------------|------------------------------------|--|-------------------|
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| <b>Sponsor</b>             | <b>Principal of Mancel College</b> |  |                   |
| <b>Approving authority</b> | <b>Board</b>                       | <b>Approval date</b>                   | <b>4 May 2024</b> |
| <b>Peter Seldon</b>        | <b>Chair</b>                       | DocuSigned by:<br><i>Peter Seldon</i>  |                   |
| <b>Name</b>                | <b>Position</b>                    | <b>Signature</b><br>CBDE3377E99D4D3... |                   |

### 1. PURPOSE

The purpose of this strategy is to eliminate and minimise risk to student safety to ensure the safety and wellbeing of all students.

### 2. SCOPE

This strategy applies to all students and employees, including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements.

### 3. RELATED INTERNAL DOCUMENTS AND EXTERNAL REFERENCES

- Language Disorder Australia Blue Card Policy
- Language Disorder Australia Blue Card Procedure
- Language Disorder Australia Restricted Person Declaration Form
- Language Disorder Australia Blue Card Register
- Language Disorder Australia Code of Conduct
- Language Disorder Australia Complaints Resolution Policy
- Language Disorder Australia Employee Performance Procedure
- Language Disorder Australia Learning and Development Policy and Procedure
- Language Disorder Australia Recruitment and Selection Policy and Procedure
- Mancel College Child Protection Policy
- Mancel College Feedback Compliments and Complaints Procedure

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Working with Children \(Risk Management and Screening\) Regulation 2020 \(Qld\)](#)
- [Child Protection Act 1999 \(Qld\)](#)
- [Child Protection Regulation 2023 \(Qld\)](#)
- [Education \(Accreditation of Non-State Schools\) Act 2017 \(Qld\)](#)
- [Education \(Accreditation of Non-State Schools\) Regulation 2017 \(Qld\)](#)
- [Education \(General Provisions\) Act 2006 \(Qld\)](#)
- [Education \(General Provisions\) Regulation 2017 \(Qld\)](#)
- [Education \(Queensland College of Teachers\) Act 2005 \(Qld\)](#)
- [Criminal Code Act 1899 \(Qld\)](#)
- [Blue Card Services Child and Youth Risk Management Strategy Toolkit](#)
- [Restricted Person Declaration Form](#)

#### 4. STATEMENT OF COMMITMENT

4.1. Mancel College is committed to taking all reasonable steps to keep students enrolled at the school safe by:

- promoting their safety and wellbeing;
- protecting them from foreseeable harm.<sup>1</sup>

4.2. In practice, Mancel College is committed to acting in accordance with the *Working with Children (Risk Management and Screening) Act 2000 (Qld)* (“the **Act**”) and the *Working with Children (Risk Management and Screening) Regulation 2020* (“the **Regulations**”) to promote the safety and wellbeing of students means and that it will implement the measures outlined.

#### 5. CODE OF CONDUCT

5.1. At Mancel College, we expect our employees to conduct themselves in line with the Language Disorder Code of Conduct Policy and also as follows:

- School employees are expected to always behave in ways that promote the safety, welfare, and wellbeing of our students. Employees must actively seek to prevent harm to students, and to support those who have been harmed.

Specific responsibilities include:

- a) Employees should avoid situations where they are alone in an enclosed space with a student.
  - o In instances where it is necessary for an employee to be alone with a student in order to complete their role (e.g. completing a Formal Standardised Assessment), the employee will notify the student’s teacher of the location, duration and purpose of this session, immediately prior to commencing the session with the student.
- b) 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.

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<sup>1</sup> *Working with Children (Risk Management and Screening) Regulation 2020 (Qld)* sch 1 s.2(1)

- c) 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.
- d) Employees must not have a romantic or sexual relationship with a student.

This commitment is evidence of Mancel College's fulfilment of the requirements of Schedule 1 s.2(2) of the Regulations.

## **6. RECRUITMENT, SELECTION, TRAINING AND MANAGEMENT PROCEDURES**

6.1. Mancel College is committed to recruiting, selecting, training, and managing employees in such a way that limits risks to students. In particular, Mancel College will:

- Ensure that its recruitment and selection procedures act to reduce the risk of harm to children from employees via:
  - a) Accurate work descriptions, including whether the successful applicant must be a teacher registered with the Queensland College of Teachers (who has been subject to relevant police and other safety checks), membership to professional bodies (e.g. AHPRA), whether a Blue Card and / or NDIS screening is necessary for the successful applicant, the responsibilities and supervision associated with the position, the nature and environment of the service provided to students, and the experience and qualifications required by the successful applicant.
  - b) Advertising the position with a clear statement about Mancel College's commitment to safe and supportive work practices and identifying that candidates will be subject to a teacher registration check or Blue Card screening, a police check, referee checks, identification verification any other appropriate screening checks as well as the requirement to disclose any information relevant to the candidates' eligibility to engage in activities including children.
  - c) A selection process that includes assessing the application via an interview process and referee and other checks (as identified above) based on the accurate work description.
  - d) A probationary period of employment, which allows Mancel College to further assess the suitability of the new employee and to act as a check on the selection process.
- Ensure that its training and management procedures act to reduce the risk of harm to students from employees via:
  - a) management processes that are consistent, fair, and supportive, a creating a transparent and safe environment.
  - b) performance management processes to help employees to improve their performance in a positive manner.
  - c) supportive processes for employees when they are experiencing challenges, such as mentoring, mediation, conflict resolution, coaching, additional training, and external support and counselling services to ensure safe environments for the students.
  - d) an induction program which thoroughly addresses Mancel College's policies and procedures, particularly its expectations regarding student risk management and to assist employees to understand their role in providing a safe and supportive environment for students.

- e) training new and existing staff on an ongoing basis to enhance skills and knowledge and to reduce exposure to risks, as follows:
  - i. policies and procedures relating to Mancel College;
  - ii. identifying, assessing, and minimising risks to students;
  - iii. handling a disclosure or suspicion of harm to a child.
- f) keeping a record of child risk management training provided to employees.
- g) exit interviews to assist Mancel College to identify broader issues of concern that may impact on the safety and wellbeing of students.

This commitment is evidence of Mancel College's fulfilment of the requirements of Schedule 1 s.2(3) of the Regulations.

## **7. HANDLING DISCLOSURES OR SUSPICIONS OF HARM**

7.1. Any of the types of concerns or reports below should be reported and managed under the Mancel College Child Protection Policy as follows:

- all staff with concerns about sexual abuse or likely sexual abuse or a child sexual offence committed by an adult.
- teachers, nurses and early childhood education and care professionals with reasonable suspicion of sexual or physical abuse.
- all staff who have received a report of inappropriate behaviour by another staff member.

To report any type of harm, all staff members should use the Report of Suspected Harm or Sexual Abuse Form in Appendix 2 of this document.

Furthermore, the Principal of Mancel College will submit reports about any investigation of harm caused, or likely to be caused, to a student because of the conduct of an employee at the school who is:

- a teacher to the Queensland College of Teachers in line with section 76 of the Education (Queensland College of Teachers) Act 2005;
- an occupational therapist, psychologist or physiotherapist to the Australian Health Practitioner Regulation Agency (AHPRA) in line with section 142 of the *Health Practitioner Regulation National Law Act 2009 (Queensland)*;
- any other allied health worker to their respective registration boards.

The Principal of Mancel College will notify the relevant regulatory boards above of the outcome of any investigation, as appropriate, at its conclusion and as soon as practicable.

Any report made under this section or the Mancel College's Child Protection Policy will fulfill the reporting obligations of all adults under the *Criminal Code Act 1899*.

This commitment is evidence of Mancel College's fulfilment of the requirements of Schedule 1 s.2(4) of the Regulations

## **8. MANAGING BREACHES OF THIS CHILD RISK MANAGEMENT STRATEGY**

8.1. Mancel College 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 Mancel College Child Protection Policy, Code of Conduct, Language Disorder Australia Complaints Resolution Policy and Mancel College Feedback, Compliments and Complaints Procedure.

This is evidence of fulfilment of the requirements of Schedule 1 s.2(5) of the Regulations.

## **9. IMPLEMENTING AND REVIEWING THE CHILD RISK MANAGEMENT STRATEGY**

- 9.1. This Strategy in its entirety and its related policies and procedures are evidence of fulfilment of the requirements of Schedule 1 s.2(6)(a) of the Regulations relating to implementation.
- 9.2. The introduction to this Child Risk Management Strategy and the “Compliance and Monitoring” section below state Mancel College’s commitment to reviewing the Strategy annually and are evidence of fulfilment of the requirements of the Schedule 1 s.2(6)(a) of the Regulations relating to review.

## **10. BLUE CARD POLICY AND PROCEDURES**

- 10.1. Mancel College is committed to acting in accordance with chapters 7 and 8 of the Act relating to the screening of employees in such a way that limits risks to children. In particular, when dealing with prospective or current employees, volunteers or trainee students and the Board, Mancel College follows the Language Disorder Australia Blue Card Policy and Procedure to ensure the safety of children present on any of the Language Disorder Premises.
- 10.2. This commitment is evidence of Mancel College’s fulfilment of the requirements of Schedule 1 s.2(6)(b).

This commitment is evidence of Mancel College’s fulfilment of the requirements of Schedule 1 s.2(6)(b) of the Regulations.

## **11. HIGH RISK MANAGEMENT PLANS**

- 11.1. Mancel College is committed to identifying risks, assessing risks, eliminating, and minimising risks and the monitoring of risk to the safety of students on an ongoing basis. Mancel College, as a business unit of Language Disorder Australia, utilises various risk management tools to assist it in this process and keeps appropriate records of decisions made and actions taken in relation to risks to children.

This commitment is evidence of Mancel College’s r Australia’s fulfilment of the requirements of Schedule 1 s.2(7) of the Regulations.

## **12. STRATEGIES OF COMMUNICATION AND SUPPORT**

- 12.1. Mancel College’s commitment to making this Child Risk Management Strategy available to students, parents, carers, and employees via its website, enrolment package, employee policy and procedures database and College intranet site is evidence of fulfilment of the requirements of Schedule 1 s.2(8)(a).
- 12.2. Mancel College is committed to training employees in relation to risks to students and will conduct this training regularly via annual formal training events, informal updates at staff meetings and regular discussions between managers and their employees, and

this is evidence of fulfilment of the requirements of Schedule 1 s.2(8)(b) of the Regulations.

### **13. RESPONSIBILITIES**

13.1. Mancel College is responsible for developing and implementing this Child Risk Management Strategy and related policies and procedures to ensure it fulfils its obligations.

13.2. All employees at Mancel College are responsible for acting in compliance with this Child Risk Management Strategy and related policies and procedures.

### **14. COMPLIANCE AND MONITORING**

14.1. Mancel College is committed to the annual review of this Strategy. Mancel College will also record, monitor and report to the school board, the Executive Leadership Team and others as appropriate at the school regarding any breaches of the Strategy.

14.2. In addition, Mancel College is committed to other various compliance and monitoring arrangements made under relevant policies and procedures.

### **15. HELPFUL LINKS**

- Independent Schools Queensland's [Child Protection Decision Support Trees](#)
- Department of Child Safety, Seniors and Disability Services [Child Protection Guide](#) resource
- [Blue Card Services resources](#)

### **16. APPENDICES**

- Appendix 1 – Summary of Reporting Harm
- Appendix 2 – Report of Suspected Harm or Sexual Abuse Form

## Appendix 1

### Summary of Reporting Harm

| Who   | What abuse   | Test   | Report to                                      | Legislation  |
|---|--|--|--|--|
| <b>All staff</b>                              | Sexual   | Awareness or a suspicion<br>Sexually abused or likely to be sexually abused  | Principal, through to police immediately       | EGPA sections 366 and 366A   |
| <b>Teacher</b>                                | Sexual and physical  | Significant harm; & Parent may not be willing and able   | Confer with principal, report to Child Safety  | CPA sections 13E and 13G   |
| <b>All staff</b>                              | Physical, psychological, emotional, neglect, exploitation  | Significant harm, & Parent may not be willing and able   | Principal, through to Child Safety             | Accreditation Regulation section 16                                |
| <b>All staff</b>                              | Any  | Not a level that is otherwise reportable to Child Safety, refer with consent   | Principal, through to Family and Child Connect | CPA Sections 13B and 159M  |
| <b>Principal</b>                              | Any  | Not a level that is otherwise reportable to Child Safety, refer without consent  | Family and Child Connect                       | CPA Sections 13B and 159M  |
| <b>Employing authority (Principal/ Board)</b> | Harm or likely harm due to the conduct of a teacher  | When you start to deal with an allegation; & When you finish dealing with an allegation  | Queensland College of Teachers                 | Education (QCT) Act 2005 sections 76 and 77                        |
| <b>Employing authority (Principal/ Board)</b> | Harm or likely harm due to the conduct of an occupational therapist, psychologist, physiotherapist | When you start to deal with an allegation; & When you finish dealing with an allegation  | Office of the Health Ombudsman                 | Health Practitioner Regulation National Law 2009 (Qld) section 142 |
| <b>Any member of the public</b>               | Any  | Significant harm & Parent may not be willing and able  | Child Safety                                   | CPA section 13A  |
| <b>Any adult</b>                              | A child sexual offence against a child by an adult   | Gains information that causes the adult to believe on reasonable grounds, or ought reasonably to cause the adult to believe, that a child sexual offence is being or has been committed and<br>(b) at the relevant time, the child is or was—<br>(i) under 16 years; or<br>(ii) a person with an impairment of the mind. | Police   | Criminal Code section 229BC  |

## Appendix 2

### Private and Confidential Report of Suspected Harm or Sexual Abuse

|               |
|---------------|
| Date:         |
| School:       |
| School Phone: |
| School Email: |

| DETAILS OF STUDENT/CHILD HARMED OR AT RISK OF HARM/ABUSE:  |                            |
|--|----------------------------|
| Legal Name:  | Preferred Name:            |
| DOB:   | Sex descriptor:            |
| Year Level:  | Cultural Background:       |
| Primary language spoken:   |                            |
| Aboriginal <input type="checkbox"/> Torres Strait Islander <input type="checkbox"/> Aboriginal and Torres Strait Islander <input type="checkbox"/> |                            |
| Does the student have a diagnosed disability:<br>Yes <input type="checkbox"/> No <input type="checkbox"/>  | Disability Category:       |
| Student's Residential Address:   | Phone:                     |
|  | Student's Personal Mobile: |

| FAMILY DETAILS   |                          |
|--|--------------------------|
| Parent/caregiver 1:  | Relationship to Student: |
| Address (if different from student):   |                          |
| Phone: (H):  | (W):                     |
| (M):   |                          |
| Parent/caregiver 2:  | Relationship to Student: |
| Address (if different from student):   |                          |
| Phone: (H):  | (W):                     |
| (M):   |                          |
| Is the student in out of home care? Yes <input type="checkbox"/> No <input type="checkbox"/>   |                          |
| Are there any Family Court or Domestic Violence orders in place? Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/> |                          |

| PERSON ALLEGED TO HAVE CAUSED THE HARM OR ABUSE |  |                                      |
|---|--|--------------------------------------|
| <input type="checkbox"/> Adult family member    | <input type="checkbox"/> Child family member | <input type="checkbox"/> Other adult |
| <input type="checkbox"/> Student/other child    | <input type="checkbox"/> Unknown             |                                      |



|   |  |  |
|---|--|--|
| <b>PROVIDE ALL INFORMATION YOU HAVE WHICH LED TO THE SUSPICION OF HARM OR ABUSE</b><br>(Attach extra pages if necessary).   |  |  |
| <b>Details of any harm and/or sexual abuse to the student</b> – please include: Time and date of the incident; location of the incident, source of information; details of person alleged to have caused the harm or sexual abuse; physical appearance of any injury; immediate and ongoing safety concerns; any disclosures made by student; any previous incidents of harm; behavioural indicators of harm; presence of any medical needs or developmental delays; and if the information relates to an unborn child, the alleged risk to the unborn child. |  |  |
| Please indicate the identity of anyone else who may have information about the harm or abuse  |  |  |
| Additional information provided as an attachment    YES <input type="checkbox"/> NO <input type="checkbox"/>  |  |  |

|   |                   |              |
|---|-------------------|--------------|
| <b>Name of staff member making report if not the Principal:</b> |                   |              |
| <b>Position:</b>  | <b>Signature:</b> | <b>Date:</b> |
| <b>Principal:</b>   | <b>Signature:</b> | <b>Date:</b> |
| <b>Principal's email address:</b>                               |                   |              |
| <b>Response requested by school:</b>                            |                   |              |

| <b>ACTION TAKEN</b>  |                          |   |
|--|--------------------------|---|
| Form was emailed to (please tick which agencies the form was sent to): | <input type="checkbox"/> | Queensland Police Services (QPS)  |
|  | <input type="checkbox"/> | Department of Child Safety, Seniors and Disability Services (Child Safety Services) |
|  | <input type="checkbox"/> | Family and Child Connect  |
|  | <input type="checkbox"/> | Queensland College of Teachers  |

(Adapted from EQ SP-4 Report of Suspected Harm or Risk of Harm)

**Confirm receipt of emailed form and ensure original is stored in a secure location along with any other documentation collected for the purpose of this report.**