Child and Youth Risk Management Strategy

Trinity College Beenleigh

Introduction

Trinity College, Beenleigh is committed to high quality learning and teaching for the students enrolled at our school. We recognise that this is best achieved when children and young people feel safe and respected. We recognise that the protection of children is everyone's responsibility.

Our Child and Youth Risk Management Strategy (CYRMS) complies with the legal requirements of the *Working with Children (Risk Management and Screening) Act* 2000 and the *Working with Children (Risk Management and Screening) Regulation* 2020. The CYRMS also adheres to the National Principles for Child Safe Organisations and the National Catholic Safeguarding Standards.

As a school within the Catholic Archdiocese of Brisbane we honour the Safeguarding Commitment of the Catholic Archdiocese of Brisbane. At this school, our commitment to the safety of students is founded within our belief in Christ. Our Marist charism is embedded within the CYRMS so it is a living practice for our students and families.

Our school's CYRMS references Brisbane Catholic Education (BCE) system wide policies and procedures which support the safety, protection and wellbeing of students and is contextualised to our school environment. For further information regarding Trinity College's CYRMS please contact the College Office on 07 3422 5222 or sbeenleigh@bne.catholic.edu.au.

The CYRMS has been developed in consultation with the students and families at Trinity College.

If a copy of any of the documents referred to below is required in another language or form for accessibility to a student or parent/carer, please contact the Principal of the school.

1.   Statement of Commitment

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Alignment with National Catholic Safeguarding Standards:
- Standard 1: Committed Leadership Governance and Culture
- Standard 10: Policies and Procedures Support the Safety of Children and Adults

Our vision and Catholic values call on us to safeguard those vulnerable to abuse and exploitation so they may engage in a successful and positive education and faith experience.

As a BCE school we are committed to the safety and wellbeing of all students and young people within our schools and communities including Aboriginal and Torres Strait Islander children, those from culturally and linguistically diverse backgrounds and children with a disability. BCE respects and values the dignity, self-esteem and integrity of every child and young person, based on our Christian belief that children and young people are entrusted to us by the love of God.

Our approach to safeguarding embodies the National Catholic Safeguarding Standards (NCSS) by operationalising the commitment of BCE as a Catholic Entity to ensure the safety of all who encounter BCE's educational services and Catholic faith community. BCE has zero tolerance to all forms of abuse and exploitation and the safety and wellbeing of students and is paramount. BCE operates under the Catholic Archdiocese of Brisbane *Safeguarding Commitment Statement* which is operationalised through the *Archdiocese of Brisbane Safeguarding Framework* and *BCE Safeguarding Policy*.

Trinity College - Statement of Commitment

Trinity College is committed to the safety, development and wellbeing of all students during their educational experience at our school. Trinity College's respect for the dignity, self-esteem and integrity of every child and young person forms part of 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. We are committed to promoting an educational environment in which each child is safe, valued for their uniqueness and respected.

2.   Code of Conduct

BCE's codes of conduct, for employees, parents, students, volunteers and third parties (including clergy, religious and certain contractors), provides direction on the requirements and expectations on how those persons are to conduct themselves in any activities associated with Trinity College, Beenleigh. This includes particular provisions on what is acceptable or unacceptable behaviour when interacting with students. The school also follows other BCE policies and procedures that support the codes of conduct and are relevant to student safety.

Employees who work at Trinity College are also bound to comply with BCE's Statement of Principles for Employment in Catholic Schools or the Statement of Principles for Employment in Catholic Education. Certain employees must also comply with other professional standards for their profession.

The key documents are set out below.

2.1   BCE Employee Code of Conduct

a.   The *Catholic Education Archdiocese of Brisbane Code of Conduct* (Code of Conduct) sets out the standard of behaviour required of all employees of BCE in the performance of their duties at Trinity College. All BCE employees must comply with this Code of Conduct.

b.   This Code of Conduct gives particular attention to the requirement for those employees to always act appropriately and professionally in their interactions with students and observe appropriate physical, emotional and online boundaries with children. It further sets out employees' duties in relation to risk management and duty of care obligations to students.

c.   The Code of Conduct is accessible on BCE's Public Website, and Intranet Spire. The Principal at Trinity College is required to monitor completion of the Code of Conduct training for school employees. For new employees at the school this occurs at the time of induction and for all other employees this takes the form of annual ongoing training.

2.2   Volunteers Code of Conduct and Third Party Safeguarding Requirements

a.   BCE has a *Volunteer Code of Conduct* and *Third Party Safeguarding Requirements* which outlines the standard of behaviour, which is required of volunteers and third parties, (including parents/carers, clergy, religious and certain contractors). These documents includes the need for volunteers and third parties to think and act safely and to treat students, employees and other volunteers with respect.

b.   Trinity College takes the following actions to ensure that these documents are implemented in the school community:

- all volunteers and third parties are able to access a copy of these documents on BCE's public website
- all volunteers and third parties are required to comply with this Code of Conduct to continue their voluntary/professional engagement at the school
- all volunteers and third parties have completed Volunteer Training or Third Party Training via the online training module located on the BCE public website.

c.   All volunteers and third parties must complete the relevant Registration and Declaration Form. These forms requires these persons to declare if they are unable to work with children due to any disqualification, suspension or other restriction regarding their Blue Card, or if they are a disqualified or restricted person and/or have been charged with a disqualifying offence as set out in the *Working with Children (Risk Management and Screening) Act* 2000.

2.3 Parents and Visitors Code of Conduct

a. BCE has a *Parent and Visitors Code of Conduct* which clarifies and outlines the standards of behaviour expected of parents and visitors at Trinity College. It is designed to support the creation of learning and work environments where all people in our school community feel safe and respected.

b. The *Parent and Visitors Code of Conduct* is accessible on the BCE Public Website.

2.4 Supplier Code of Conduct

a. BCE has a *Supplier Code of Conduct* which outlines the expectation that our suppliers will act in a manner that is consistent with the principles for socially responsible, sustainable, and ethical business practices and that these principles are adopted throughout their supply chains. The code specifically outlines BCEs commitment to safeguarding and the expectation that supplier and/or their personnel will:

- promote a culture of safety and comply with BCE safeguarding provisions in relevant Agreements
- comply with any requirements under the Queensland Blue Card Scheme, including undertaking relevant screening and the development of their own Child and Youth Risk Management Strategy (where applicable)
- not engage in inappropriate behaviour with a student
- report concerns relating to students or an adult as soon as practical

b. The *Supplier Code of Conduct* is accessible on BCE's Public Website.

2.5 Student Behaviour Support Policy

a. Trinity College uses Positive Behaviour for Learning (PB4L) – a framework for creating positive, safe and supportive school climates where students can grow and learn. Our school community works together to establish expected safe behaviours and teach them to all students. The framework includes practices that aim to support a student to correct inappropriate or harmful behaviours towards other students, employees, other persons or the school environment. It also celebrates students achieving and demonstrating positive and safe behaviours.

b. Trinity College has developed a Student Behaviour Support Plan for the school in consultation with all groups in the school community and in accordance with BCE's Student Behaviour Support policy and procedure, Managing Challenging Behaviour procedure and complex case management process. This Support Plan reflects the shared values and expectations of the school regarding student behaviour support and encourages a supportive and safe Catholic school environment for all. The Student Behaviour Support Plan includes a student code of behaviour and information on formal sanctions and prevention and responding to bullying and harassment, guided by BCE's Student Behaviour Support policy and procedure. The Student Behaviour Support Plan is readily accessible to students and parents and is uploaded on Trinity College's Website.

c. Our school uses BCE's *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.

3.   Recruitment, Selection, Training and Management

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Alignment with National Catholic Safeguarding Standards:
- Standard 5: Robust Human Resource Management
- Standard 7: Ongoing Education and Training
- Standard 10: Policies and Procedures Support the Safety of Children and Adults

3.1   Recruitment, selection and management of employees.

a.   Trinity College adheres to the requirements of 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* 2020, *Education (Accreditation of Non-State Schools) Act and Regulation* 2017, and the *Education (Queensland College of Teachers) Act* 2005 when engaging employees.

b.   Trinity College recruits and selects employees who work with students in the school who are appropriately qualified and suitable for working with children and young people. Trinity College is responsible for employee recruitment, selection, training and management of employees in the school in partnership with personnel from the BCE office. Principals and employees involved in employee recruitment, selection, training and management of employees at the school comply with the relevant BCE policies which are published on the BCE Intranet, Spire and include the *Recruitment, Selection and Appointment Procedure* and the *Employee and Volunteer Screening Procedure.*

c.   In advertising new positions for the school, the advertisement states that "The Archdiocese of Brisbane has standards of conduct for workers to maintain a safe and healthy environment for children. Our commitment to these standards requires that we conduct working with children checks and background referencing for all persons who will engage in direct and regular involvement with children and young people and/or vulnerable adults. The organisation is fully committed to child safety and has a zero tolerance to abuse of children or vulnerable adults". It is also subject of positive assessment by robust reference checks and targeted interview questions in respect of child safe practices as relevant to the position.

d.   Screening is taken seriously which includes (before commencing work or duties at a school):

- All employees working at *Trinity College* are required to comply with the *Employee and Volunteer Screening Procedure.*

- All non-teaching employees, volunteers and trainee students who work with students and who require a Working with Children Card (Positive Notice blue card) under the *Working with Children (Risk Management and Screening) Act* 2000, are required to obtain a Working with Children Card (Positive Notice blue card) prior to commencement of work/volunteering at the school and keep it current.

- All teachers must produce evidence of current teacher registration with the Queensland College of Teachers (QCT) before they commence work at *Trinity College*.

3.2   Training of Employees

a.   The *Student Protection Policy* and *Student Protection Training Procedure* provides guidance regarding BCEs approach to safeguarding students through student protection training.

b.   The Principal is required by BCE to ensure that all new BCE employees at Trinity College 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. This induction training is aimed at supporting BCE and Trinity College to provide an environment that is safe and supportive for students. Further details regarding BCEs approach to safeguarding training is provided below:

- All employees at Trinity College must complete Mandatory Student Protection Training. This training provides an overview of BCE's Student Protection Processes and supports employees

to understand requirements for recognizing and reporting student protection concerns relating to:

- risk of harm to students, or suspicions or allegations, involving sexual abuse/likely sexual abuse, physical abuse, emotional abuse or neglect
- inappropriate behaviour of employees, volunteers and third parties, and any person in the school community towards students.

- New employees must complete Mandatory Student Protection Training prior to commencing work with students at the school. Relief staff who are not able to complete Mandatory Student Protection Training prior to commencement, receive a student protection briefing session prior to commencing work with students. They are then required to complete the Mandatory Student Protection Training once access to internal systems is activated.

- In addition to mandatory training, our staff are provided with opportunities to undertake face-to-face student protection refresher training in Terms 2 and 4.

- Further mandatory training is also offered to Student Protection Contacts at Trinity College, to support their specialised role in the school. including:

  - induction for newly appointed Student Protection Contacts,
  - refresher training (every 2 years) and
  - advanced skills training (every 4 years).

- Privacy and Data Breach Awareness training is undertaken by all employees annually as part of a suite of core compliance courses.

- At BCE, compliance with Mandatory training is monitored and tracked and systems are in place to ensure compliance.

c. BCE has available policies, processes and resources to support the pastoral care and wellbeing of students at Trinity College. These are readily accessible to BCE employees on BCE's Intranet, Spire.

d. The Principal at Trinity College provides informal training, from time to time, at employee meetings and 'in service' days, so that employees at the school are aware of these policies. Example policies and processes include:

- Student Wellbeing policy
- Student Diversity and Inclusion policy
- School Uniform policy
- Inclusive Education and Student Wellbeing Position Statements
- Students in out-of-home care
- Natural Disasters
- Critical Incidents
- Catholic Perspectives across the Curriculum
- Preventing and Responding to Student Bullying and Harassment policy/procedure
- Alcohol and other Drug related incidents procedure
- Exclusion procedure
- Detention procedure
- Suspension procedure
- Negotiated change of school procedure
- Physical Interventions procedure
- Police Interventions in Schools procedure
- Weapons in Schools procedure

- Manual Handling of Students procedure
- Suicide Intervention Prevention
- Managing Non-suicidal Self-Injury in Students' procedure
- Students with Disability
- Student Attendance policy and procedure
- Management of actual or perceived aggression training
- Positive Behaviour for Learning
- Student Behaviour Support policy and procedures
- Template - School Behaviour Support Plan
- Guidelines - Informed consent for Guidance Counsellors (GC)
- GC Management of Confidential Information procedure
- Transitions – career development P-12
- Youth Support Coordinator Initiative
- Students with disability processes, guidelines and resources

- Guidelines and support plan for students who are gender diverse.
- Privacy policy

- Managing Challenging Behaviour
- Health, Safety and Wellbeing Risk Management Procedure

e. BCE has student wellbeing employees who supports Trinity College in the pastoral care and wellbeing of students at the school and develops strategies, policies and procedures to assist the school and students. Trinity College employs a Guidance Counsellor to work with students, parents and employees and provide pastoral care, personal safety strategies, support for students who are vulnerable and support for students who may be at risk of being harmed. Schools are supported by BCEO specialist employees in complex matters.

f. BCE schools use the Australian Curriculum to address respectful relationships and employees use the resources in the Respectful Relationships Hub developed by the Department of Education (Queensland).

3.3 Management of Employees

a. The Principal of Trinity College is responsible for the management of an employee's behaviour in the first instance and with the support of BCE when appropriate. This includes recognising behaviour and work practices that champion student safety and respect as well as responding promptly to any behaviours or practices that do not support student safety or is, or likely to be, harmful or abusive to a student. The process for managing employee's includes annual appraisals, goal setting, recognition and awards, performance enhancement and management, complaint management and disciplinary procedures when relevant.

b. Where there is a complaint or allegation in relation to an employee of inappropriate behaviour unsatisfactory performance or misconduct involving a student, the Principal will follow the *Workplace Complaints Procedure* and *Employee Misconduct Procedure* that sets out a clear and consistent process for handling complaints and allegations of misconduct involving employee behaviour towards or with a student.

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

d. BCE promotes the capacity of employees to contribute to the mission of our organisation through ongoing professional development and professional learning. The BCE *Performance Development Plan Procedure*, and the *People Performance Framework*, guide individual performance and development which is undertaken at all levels throughout the organisation. Both the *Catholic Identity Framework* and *Leadership Capability Framework* articulate the requirements for BCE employees to model and promote a culture where student protection is the responsibility of everyone.

3.4 Managing volunteers and third parties, engaged by the school to provide a service to students, e.g. parent or other volunteers, clergy, religious and certain contractors.

a. In the life of school activities, it is common for volunteers, parents, carers, clergy, religious, guest speakers and individual contractors (such as swim instruction, music, VET or dance teachers), to support the education of students. Consistent with section 2 of this CYRMS, Trinity College ensures such persons are appropriately screened, trained, supervised and supported to carry out those roles safely with students and all involved.

b. To ensure these opportunities and activities are a safe and positive experience for students and all involved the Principal is responsible for ensuring that the requirements under sections 2.2 and 3.1 above in this strategy document are adhered to. This includes ensuring the relevant persons have access, and adhere to, the *Volunteer Code of Conduct* or *Third Party Safeguarding Requirements*, receive induction training and relevant screening requirements are completed.

c. The Principal is further responsible for ensuring that the necessary directions and support are provided to volunteers and third parties so they may carry out their role. This includes ensuring they are aware

that they are expected to report any concerns about student safety or abuse/harm under the *Volunteer Code of Conduct or Third Party Safeguarding Requirements* and they know who to report these concerns to.

d. BCE has developed a *Third Parties Guide* to support staff in understanding and implementing relevant safeguarding requirements when engaging with third parties and contractors. A *Contractor Induction Manual* to give contractors information on BCE's Work Health and Safety Contractor Management System at BCE schools, so that contractors working at Trinity College play their role in maintaining a safe environment for students.

e. The Principal is responsible for responding to any concerns, allegations or complaints arising from the behaviour of a volunteer or third parties and reporting any such behaviour, if required, to BCE and/or relevant external authorities.

f. The student's safety is a paramount concern when responding to a concern, allegation or complaint involving a student.

g. If a concern/allegation/complaint involves a person from an external organisation, (such as a member of clergy, a religious, an agency contractor), the Principal and BCE will engage with the relevant authority for that person, for example the relevant leader of a Catholic Diocese or Religious Congregation, the Head of another faith entity or a Director of a camp or retreat centre.

4. Reporting Disclosures and Suspicions of Harm

Alignment with National Catholic Safeguarding Standards:
- Standard 2: Children and Adults are Safe, Informed and Participate
- Standard 5: Robust Human Resource Management
- Standard 6: Effective Complaints Management
- Standard 10: Policies and Procedures Support the Safety of Children and Adults

This section relates to policies and procedures for how the school responds to disclosures, concerns or suspicions of harm to a student.

4.1 The Student Protection Policy and Student Protection Processes

a. BCE's *Student Protection Policy* and *Student Protection Processes* provide guidance for all employees who work at Trinity College 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 towards students.

The processes also outline that it is a crime:

- for certain people not to protect a child from a known risk of sexual offending; and/or
- to fail to report sexual offending against a child in the absence of a reasonable excuse.

b. Training in relation to how these laws apply in our school and the procedures for responding to any such matters are provided to all employees as set out above in this document.

c. The *Student Protection Processes* have been developed in accordance with legislative requirements, satisfy relevant requirements under the *National Catholic Safeguarding Standards* and are underpinned by the *Student Protection Policy (2024)*. *The Student Protection Processes and Guidelines Catholic Education Archdiocese of Brisbane* document is reviewed and republished in keeping with the Queensland Catholic Education Commission template that was developed in collaboration with BCE and other Catholic employing authorities. The BCE processes are approved by the Non-State Schools Accreditation Board.

d. The BCE *Student Protection Processes* are available on the BCE public website and BCE intranet Spire.

4.2 Reporting

a. The code of conduct for employees provides guidance on expectations, and school employees have received ongoing training, to reinforce that the protection of students and reporting of concerns/allegations is everyone's responsibility.

b. On receipt of a disclosure or suspicion of harm to a student a decision is made as to whether a State Authority Report is required. If such a report is required, the following will occur:

- reports are made to the department responsible for Child Safety for harm/risk of harm to a child caused by sexual abuse, physical abuse, emotional abuse or neglect where there may not be a parent able and willing to protect the child.
- reports are made to the Queensland Police Service in relation to allegations or reasonable suspicions of sexual abuse/likely sexual abuse of a student.
- reports required under the *Criminal Code Act 1899* which are not made under the *Child Protection Act 1999,* or the *Education (General Provisions) Act 2006* are made to the Queensland Police Service. A dedicated form has been developed to assist adults to meet their responsibility to report a child sexual offence.

c. If a disclosure or suspicion of harm relates to inappropriate behaviour of a paid employee, a volunteer or third parties, at the school towards a student or other child, the matter will be managed by the Principal, with support from BCE's Employee Relations and Student Protection Team, as appropriate in respect to the school environment.

d. The school provides training for employees on how to respond to disclosures and suspicion of harm. This includes:

- all school-based employees must complete annual mandatory Student Protection Training. The Principal ensures that all employees are compliant with this training.
- all school-based volunteers and third parties are informed of how to raise a concern if they hear about, or receive any information in any other form, that may involve a disclosure or suspicion of harm to a student. Further, they are required to complete the Volunteer Training or Third Party Training (also refer to section 2.2 above).

4.3 Accessibility of Information

The Principal ensures information is accessible to students, parents, employees, and volunteers and third parties, to inform them on how to raise a concern, allegation or complaint involving the safety of a student. This includes:

a. The *Student Protection Processes* are readily available for employees, parents, students and carers and Trinity College has the link to these processes on our school website. Our school has a local school-based flowchart to ensure all employees understand how a student protection concern is to be communicated and managed in accordance with the Student Protection Processes.

b. BCE has processes to enable employees at *Trinity College* to document and report student protection concerns and inappropriate behaviour of employee, volunteer or third parties towards a student. This is achieved through the development of an electronic system. This system also facilitates electronic submission of State Authority Reports to the relevant state authority.

c. BCE has a complaints procedure to enable parents or students at Trinity College 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* located on BCE's public website. BCE and Principals are required to handle these complaints in accordance with BCE's Procedure for Handling Complaints about Non-Compliance with BCE's Student Protection Processes.

4.4 Support for Students and Families

a. The school has available supports, if required, for students, families, and employees 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 BCE resources, or external supports may be required.

b. A parent/carer student protection information session is provided by the school to support parents parents and carers to understand the school's *Student Protection Processes and Guidelines*, what to do if they are worried about the safety and/or well-being of a student, who to talk to in the school if they are worried, what happens after a parent/carer tells someone, what they can do to keep their child/ren safe and protected. This is further complemented by *a Student Protection Parent/Carer Toolkit* which is shared to the school community and available on the BCE public website.

4.5 Specific Support Roles

Student Protection Contacts in Schools

a. In accordance with the Education (Accreditation of Non-State Schools) Regulation 2017, Trinity College has three stated employees to whom a student can report behaviour of another employee that the student considers is inappropriate. They are known as Student Protection Contacts.

b. The Principal is a Student Protection Contact at the school. The other Student Protection Contacts are the College Guidance Counsellors. These nominated persons may be contacted through the school office.

c. The role of the Student Protection Contact is to receive complaints and allegations from employees and students and to make or assist employees to make all reports as outlined in BCE's Student Protection Processes. The identity of the Trinity College Student Protection Contacts is made known to employees, students, volunteers and parents by publishing their details on the school's website and for example in school newsletters, on posters in the school and at parent information nights.

d. Information about the Student Protection Contacts and requirements for their appointment is detailed within the BCE's *Student Protection Processes*.

Employee Relations and Student Protection Team

a. BCE's Employee Relations and Student Protection Team are a support resource for our school and have expertise in the field of risk assessment and risk management, child protection and employee professional standards. This team:
   - assists our school-based employees to identify whether there is a reasonable suspicion of abuse, harm and/or employee 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 and facilitate professional learning for our school-based employees.

5.   Managing Breaches

a. BCE and Trinity College both have their own CYRMS. BCE and our school take any breach of the CYRMS seriously.

b. BCE has a *BCE Complaints Policy and Complaints Management Student, Parent and Guardians Procedure* which are accessible on the school and BCE websites or by contacting the Principal. Under this process, any breach of the Strategy 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 the BCE *Workplace Complaints Procedure*, the *BCE Employee Misconduct Procedure* or *Employee Underperformance Procedure*.
- if the alleged breach relates to a report of inappropriate behaviour of an employee towards 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 or third parties, it will be dealt with similarly to the procedures set out in the *Student Protection Processes* or complaints procedures, 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.

c. Details regarding management of any breach, including who manages the breach, are contained in the procedures mentioned above. All records about individual concerns or incidents are kept confidentially in BCE business information systems.

d. BCE undertakes a system review for serious breaches of policy, including to identify any system improvement to policy, procedure or training and address any additional training requirements for individuals.

6.   Risk Management Plan for High-Risk Activities

This section relates to how Trinity College identifies and manages risks to students through risk management plans and responds to any breach of those plans or the CYRMS.

6.1   Regular Strategies to Minimise Risks of Harm

a. Trinity College undertakes regular risk assessments and management strategies as part of our daily education program during school days and activities. In this regard we apply the Qld *How to Manage Work Health and Safety Risks Code of Practice* for risk assessments and our risk assessments are supported by relevant BCE policy and procedures. Further information about the risk assessments is available through the school Principal.

b. The record of each risk assessment and risk management plan undertaken are kept at the school so they may be properly followed, and are subject of internal BCE checks, and available for Blue Card Services to review/audit if requested.

c. The school's regular risk assessments include, but not limited to, the following activities:

- 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
- Behaviour, safety, and wellbeing
- Engagement of third parties/contractors

d. In respect of bathrooms and toilets Trinity College, Beenleigh has implemented the following strategies:

- Students and employees have received clear guidelines in relation to student use of bathrooms and toilets.
- Guidelines and directions ensure the privacy of children and young people while allowing for appropriate supervision, e.g. announcing entry to the room and avoiding being alone with a child in these locations.
- The BCE code of conduct for employees provides direction on this area and employees are informed of these provisions.
- Parents and carers have been informed of the above.

e. In respect of devices used to take photos of students. Trinity College, Beenleigh has implemented the following strategies:

- The BCE code of conduct for employees reinforces how employees are to manage how and when photos are taken of students and the use of devices and social media in regard to student photos.
- Employees are informed of what is acceptable practice and the approved procedures regarding student photos.
- The Principal has provided a direction to employees that they are not to use a personal device (e.g. personal camera, personal mobile phone, iPad, or personal video recorder, etc.) to take, record, or store any student information (e.g., phone number, email address, etc.) recordings, or images. Where a mobile device is used, staff members must use Office Lens which saves the image into the schools OneDrive without a copy or legacy image remaining on the device.
- Confidential management of student information: School employees are required to handle private and confidential information in relation to students and parents/guardians in accordance with the BCE *Privacy Policy* and BCE code of conduct for employees.
- Online safety training is completed by students studying Industrial Design Technology and Hospitality. This safety training assists teachers to ensure that students receive consistent safety training for the use of high-risk equipment in these curriculum areas.
- Curriculum Activity Risk Management: Procedures have been developed to identify risks associated with the delivery of specific teaching activities including Visual Arts safety, Food Technology safety, ITD safety and Science safety. Further information on such procedures is available by contacting the Principal.

6.2   A risk management plan for high-risk activities and special events

a. The Principal is responsible for ensuring that risk assessment are undertaken for high-risk activities and special events at Trinity College.

b. In developing a high-risk strategy/plan *Trinity College* takes into consideration the context of the activity or event including:

- the nature of the activity and the objectives in conducting it
- the environment or location of the activity
- the stakeholders involved in the activity including children and young people
- identify the specific risks and identify the control measures that are already in place and whether additional controls are required.

c. When undertaking a more high-risk activity or special event (for example a fete, overnight camp/retreat), our school identifies any specific potential risks relevant to that activity in the risk assessment undertaken and considers and implements controls for the safety and wellbeing of students and the risk of harm to students**.** This is documented in the risk management plan for each high-risk activity and secured at the school.

d. Trinity College refers to information in relation to risk assessments for various activities and risk assessment tools provided on BCE's Intranet, Spire.

e. If relevant, the following issues are also considered:

- Transportation
- Toileting/change room procedures
- Ensuring appropriate supervision of children and ratios of adults to children
- Ensuring appropriate supervision of volunteers
- A media consent process in relation to photographs
- Managing medications and allergies
- Managing illness/injury

- Emergency/lockdown procedures
- Relevant consent forms, including emergency contact details
- Procedures or processes applying to visitors, volunteers and contractors
- Any risks presented by the physical environment or activity
- Accommodation and supervision requirements.

f. The Health, Safety and Wellbeing Team at BCE and a dedicated Workplace Health and Safety Officer ("WHSO") at Trinity College provides support to our school, if requested, to help us carry out risk assessments and develop and implement a risk management plan.

g. Information about the risk assessments for high-risk activities are accessible by contacting the Principal.

h. The school's risk assessments for high-risk activities are kept at the school so they may be properly followed and are subject of internal BCE checks and available for Blue Card Services to review/audit if requested.

6.3   Risk Management for Excursions, Incursions and Fetes as high-risk activities:

a. The Principal is responsible for approving all excursions and fetes. Key elements include:

- The Principal has reference to BCE forms and fact sheets to assist in identifying, assessing and managing risks associated with all excursions and incursions (including fetes),
- The Principal ensures that a risk assessment is completed prior to any excursion or inclusion in the approved form. This form specifies that in carrying out a risk assessment, student protection risks must be assessed and managed.
- The Principal accesses links to relevant information forms and guidance provided on SPIRE, to assist in the risk assessment and management process.
- The Principal completes all applicable planning checklists relevant to an excursion or incursions prior to the excursion or incursion taking place.

b. The Principal uses, so far as reasonably practicable, applicable BCE approved contract templates which include obligations relating to working with children requirements and child safeguarding, to the extent required by law. Where a third party's terms are sought to be relied upon, the Principal seeks advice and support regarding those terms, prior to proceeding.

7. Managing Compliance with the Blue Card System

ACSL
AUSTRALIAN CATHOLIC SAFEGUARDING LTD

Alignment with National Catholic Safeguarding Standards:
• Standard 5: Robust Human Resource Management
• Standard 10: Policies and Procedures Support the Safety of Children and Adults

To support our school's safeguarding commitment and practices the school ensures consistent application of its legal requirements under Chapter 7 and 8 of the *Working with Children (Risk Management and Screening) Act 2000* This includes consistency in our management of the working with children card and ensuring we have strategies in communication and support to members of the school community.

7.1   Working with Children Card (Positive Notice blue card) Requirements and Employee and Volunteer Register

a. Trinity College complies with BCE's Working with Children Check (Blue Card Screening) Procedure (The Procedure). The Procedure details BCE's requirements in accordance with the *Working with Children (Risk Management and Screening) Act* 2000 to ensure that required employees and relevant volunteers hold a Working with Children Card (Positive Notice Blue Card).

b. All non-teaching employees, volunteers (unless exempt) and trainee students who work at Trinity College with children under 18 years of age are required by our school to obtain working with children clearance and hold a Working with Children Card (Positive Notice blue card or exemption card) before an offer of employment is made and prior to working with children.

c. The 'No Card, No Start' provisions apply to:

• all school-based BCE employees who are not registered with either the Queensland College of Teachers or the Australian Health Practitioner Regulation Agency

• volunteers (who are not parents of children attending the school)

• preservice teachers undertaking practical experience 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, 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 as they hold an exemption).

d. BCE records Working with Children Card (Positive Notice blue card) information for all paid employees. Trinity College maintains a register of all employees required to hold a Working with Children Card (Positive Notice blue card) or exemption card and is responsible for linking the employee to the school via the Blue Card Services Organisation Portal.

e. Trinity College maintains a register for all volunteers, including those who are exempt from holding a Working with Children Card (Positive Notice blue card). This will generally be volunteering parents of a child attending the school. Volunteers who require a Working with Children Card (Positive Notice blue card) under the *Working with Children (Risk Management and Screening) Act 2000* must obtain the Working with Children Card (Positive Notice blue card) before commencing volunteer work and need to be linked by the school via the Blue Card Services Organisation Portal.

8.   Communication and Support

a.   To ensure accessibility and supportive information/training on the CYRMS the Principal implements and communicates Trinity College's CYRMS to employees, parents/carers, volunteers and third parties. This includes:

- Placing the school's CYRMS on the school's website.
- Providing a printed copy upon request.
- Providing training to the school's employees on the School's CYRMS
- Requesting volunteers and third parties (including relevant contractors and suppliers) to review the CYRMS
- Ensuring the mandatory training in respect of student safety as referred to in this document is adhered to.

8.1   Procedures for reviewing the CYRMS

a.   To ensure that Trinity College CYRMS remains current and effective, this strategy is monitored and reviewed annually. Also, in the event that Trinity College identifies concerns, particularly following an incident, Trinity College's CYRMS will be reviewed, and any actions documented. Issues to be considered in the review may include:

- whether BCE and school policies and procedures were followed
- whether any incidents/concerns relating to risk management regarding children and young people occurred
- the effectiveness of the process used to manage any incidents
- the effectiveness of BCE's and Trinity College'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 Trinity College's CYRMS.

b.   Following the review, employees, parents and volunteers at Trinity College are advised of any significant changes to BCE's or Trinity College's policies and procedures as a result of the review and appropriate training or information will be provided.

Document Updated: 12 August 2025

Updated By: Allison Elcoate (Principal)