



# Reporting Concerns of Harm and Abuse Policy

Review Period	Last Review	Next Review
Annually	January 2026	August 2026

## Section 1 - Purpose

The purpose of this policy is to provide written processes about:

- how Ipswich Grammar School (**The School**) will respond to harm, or allegations of harm, to students under 18 years;
- the appropriate conduct of the School's staff and students; and

to comply with the accreditation requirements.

## Section 2 - Overview

This policy covers information about reporting harm and suspected harm; inappropriate behaviour; sexual abuse and likely sexual abuse. It is to be read in conjunction with the Student Protection Management Strategy and all other guidelines and policies of the School. The School has an ethical and legal responsibility to ensure that all suspicions of harm to a student are reported promptly and via the appropriate procedures.

## Section 3 - Scope

This policy applies to all students, parents, and staff members, including the Ipswich Grammar School Board, as well as contractors, volunteers and people undertaking work experience or vocational placements at the School.

The School seeks to create an environment where staff members, students and parents are encouraged to and feel comfortable in raising concerns and reporting under this Policy.

## Section 4 – Policy

### Principles

Ipswich Grammar School is committed to:

- providing high quality, consistent and transparent documents for staff members, students, the Board and affiliates of the School;
- maintaining segregation of duties where possible, or appropriate review mechanisms to ensure clear procedures and safety of students;
- maintaining proper child safety records and systems, and other records, in accordance with current legislations and requirements;
- establishing and maintaining measures to minimise and manage risk to student wellbeing; and
- complying with external reporting and other information provision requirements.

### Health and Safety

The School has written processes in place to enable it to comply with the requirements of the *Work Health and Safety Act 2011* (Qld) and the *Working with Children (Risk Management and Screening) Act 2000* (Qld).

### Responding to Reports of Harm

When the School receives any information alleging 'harm' to a student (other than harm arising from physical or sexual abuse) it will deal with the situation compassionately and fairly to minimise any likely harm to the extent it reasonably can. This is set out in the *School's Strategic Risk Management Policy*. Information relating to physical or sexual abuse is handled under obligations to report set out in this policy.

### Conduct of Staff and Students

All staff, contractors, and volunteers must ensure that their behaviour and relationships with students reflect proper standards of care for students. Staff, contractors, and volunteers must not cause harm to students.

The School will ensure that staff members, contractors and volunteers have a positive notice (blue card) as required by the *Working with Children (Risk Management and Screening) Act 2000* (Qld).

The School will ensure that students are educated, at an age-appropriate level and understanding, of the importance of their behaviour and safety.

## Reporting Inappropriate Behaviour

If a student considers the behaviour of a staff member to be inappropriate, the student should report the behaviour to any of the following:

- Headmaster
- Deputy Headmaster
- Head of Junior School
- Dean of Students
- School Counsellor
- Director of Boarding.

## Dealing with Report of Inappropriate Behaviour

A staff member who receives a report of inappropriate behaviour must report it in accordance with the School's reporting process (**Reporting Concerns of Harm and Abuse Procedures**). Where the Headmaster is the subject of the report of inappropriate behaviour, the staff member must inform the Chair of the Board.

If an incident involves a teacher at the School, in accordance with section 76 of the *Education (Queensland College of Teachers) Act 2005* (Qld), the Headmaster of Ipswich Grammar School will report to the Queensland College of Teachers of the commencement of any investigation into allegations of harm caused, or likely to be caused, to a student because of the conduct of a relevant teacher at the School.

## Reporting Sexual Abuse

Section 366 of the *Education (General Provisions) Act 2006* states that if a staff member becomes aware, or reasonably suspects in the course of their employment at the School, that any of the following has been sexually abused by another person:

- a student under 18 years attending the School;
- a kindergarten-aged child registered in a kindergarten learning program at the School;
- a person with a disability who:
  - under section 420(2) of the *Education (General Provisions) Act 2006* is being provided with special education at the School; and
  - is not enrolled in the pre-preparatory year at the School,

then the staff member must immediately give a written report about the abuse or suspected abuse to the Headmaster or the Chair of the Board. In this regard, the reporting functions assigned to the director of the school's governing body under section 366 and 366A the *Education (General Provisions) Act 2006* (QLD) have been delegated to the Chair of the Board.

The School's Headmaster, or Chair of the Board must immediately give a copy of the report to a police officer.

If the first person who becomes aware is the School's Headmaster, the Headmaster must give a written report about the abuse, or suspected abuse to a police officer immediately and must also immediately give a copy of the report to the Chair of the Board. See section *Mandatory reporting of Physical and Sexual Abuse* for reporting requirements of the Headmaster to external services.

A report under this section must include the following particulars:

- the name of the person giving the report (the first person);
- the student's name and sex descriptor;
- details of the basis for the first person becoming aware, or reasonably suspecting, that the student has been sexually abused by another person; and
- details of the abuse or suspected abuse.

Any of the following information of which the first person is aware:

- the student's age;
- the identity of the person who has abused, or is suspected to have abused, the student; and
- the identity of anyone else who may have information about the abuse or suspected abuse.

## **Reporting Likely Sexual Abuse**

Section 366A of the *Education (General Provisions) Act 2006* (QLD) states that if a staff member becomes aware, or reasonably suspects in the course of their employment at the School, that any of the following is likely to be sexually abused by another person:

- a student under 18 years attending the school;
- a kindergarten-aged child registered in a kindergarten learning program at the School;
- a person with a disability who:
  - under section 420(2) of the *Education (General Provisions) Act 2006* is being provided with special education at the School; and
  - is not enrolled in the pre-preparatory year at the School,

then the staff member must immediately give a written report about the suspicion to the Headmaster or the Chair of the Board. Again, the reporting functions assigned to the director of the School's governing body under the section 366 and 366A the *Education (General Provisions) Act 2006* have been delegated to the Chair of the Board.

The Headmaster or the Chair of the Board must immediately give a copy of the report to a police officer.

If the Headmaster becomes aware or reasonably suspects likely sexual abuse, the Headmaster must immediately give a written report about the suspicion to a police officer and must also immediately give a copy of the report to the Chair of the Board. See section *Mandatory reporting of Physical and Sexual Abuse* for reporting requirements of the Headmaster to external services.

A report under this section must include the following particulars:

- the name of the person giving the report (the first person);
- the student's name and sex descriptor;
- details of the basis for the first person reasonably suspecting that the student is likely to be sexually abused by another person;

Any of the following information of which the first person is aware:

- the student's age;
- the identity of the person who has abused, or is suspected to be likely to abuse, the student; and
- the identity of anyone else who may have information about suspected likelihood of abuse.

## **Mandatory Reporting of Harm, Physical and Sexual Abuse**

Under Section 13E (3) of the *Child Protection Act 1999* (Qld), if a doctor, a registered nurse, AHPRA registered staff member, or a teacher, forms a 'reportable suspicion' about a child in the course of their engagement in their profession, they must make a written report. Per the Schools Reporting Concerns of Harm and Abuse Procedure document, the Headmaster or Chair of the Board will take over the process and report to the appropriate sources on behalf of the Mandatory reporter. If the Mandatory Reporter does not receive a confirmation email from the Headmaster, it is the Mandatory Reporters responsibility to confirm the submission of the report to Child Safety. If the mandatory reporter reasonably supposes that the Headmaster has not provided the report to Child Safety, the mandatory reporter must make the report directly to Child Safety.

A reportable suspicion about a child is a reasonable suspicion that the child:

- has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and
- may not have a parent able and willing to protect the child from the harm.

The doctor, nurse, AHPRA registered staff, teacher or early childhood education and care professional, where appropriate, should confer with the Headmaster in preparing a written report (*Child Protection Act 1999 (Qld)*).

In accordance with the *Child Protection Regulation 2023 (Qld)*, the following information is prescribed for inclusion in the written report.

- state the basis on which the person has formed the reportable suspicion;
- include the information prescribed by regulation, to the extent of the person's knowledge;
- the child's name and age;
- the child's sex descriptor (as defined in Schedule 3 of the Child Protection Act);
- details of how to contact the child (e.g., the address which the child usually lives, the name and address of the school that the child attends);
- details of the harm reported, and the person suspected of causing harm to the child; and
- identity of any other person who may be able to give information about the harm to which the report relates.

## **Responsibilities under Criminal Code Act 1899 (Qld)**

The *Criminal Code Act 1899 (Qld)* includes two offences that pertain to the failure to report a child sexual offence and the failure to protect a child against a child sexual offence. A child sexual offence is an offence of a sexual nature by an adult against a child under 16 years or a person with an impairment of the mind.

### **Failure to Report**

Under section 229BC of the *Criminal Code Act 1899 (Qld)*, all adults must report sexual offences against a child by another adult to police as soon as reasonably practicable after the belief is, or ought reasonably to have been, formed. Section 229BC definition of adult includes students 18 years or over, parents/guardians and volunteers of the school. Failure to make a report, without a reasonable excuse, is a criminal offence. A reasonable excuse not to make a report under the *Criminal Code Act 1899 (Qld)* includes that a report has already been made under the *Education (General Provisions) Act 2006 (Qld)* (reporting sexual abuse or likely sexual abuse) and the *Child Protection Act 1999* (reporting significant harm or risk of significant harm) as per this policy.

### **Failure to Protect**

Under section 229BB of the *Criminal Code Act 1899 (Qld)*, all adults in positions of power or responsibility within institutions to reduce or remove the risk of child sexual offences being committed must take reasonable steps to protect children in their care from a child sexual offence. A failure to protect is an offence.

## **Students 18 Years and Older**

The School's reporting requirements for students 18 years and over are the same as those for younger students. However, any external communication regarding adult students must be done with the student's privacy and legal age in mind. The School's policy is to report all such matters, regardless of a student's age unless reported under the National Redress Scheme, and reports will be made in consultation with the student. It is the School's policy to report any historical sexual abuse to the police pursuant to the *Criminal Code (Child Sexual Offences Reform) and Other Legislation Amendment Act 2020 (Qld)*. The School's support for students remains in place regardless of age.

## **Harm and Self-Harm**

During their schooling, some students may be at risk of harming themselves or being harmed by others. Harm may include physical acts, ingestion of prohibited or unregulated substances, risky, criminal or addictive behaviour. It may be intentional or unintentional. It may occur with or without suicidal intent. In a case where self-harm occurs or is reasonably suspected of occurring or likely to occur, in a context of parents not acting protectively or being unable to protect the student for any reason (including a student being unresponsive to parental attempts to help them), it may be necessary to report the harm externally in accordance with this Policy. Such reports may be made with the knowledge of parents, but the School does not have to advise any parent of such a report.

Harm might also include harm by other students, children or any person and may include assault or threats of assault, bullying, cyber bullying, gaslighting, exclusion, threats of harm or exposure to inappropriate images or substances.

Reports of harm or self-harm may be made with the knowledge of parents, but the School does not have to advise any parent of such a report where a parent is unable to protect the student for any reason.

Ultimately, where such reports are made to ensure, as far as reasonably practicable, the protection of the child, parents and the School agree that such reports should be made, and action taken to protect the best interests of the child.

## **Awareness and Accessibility of Processes**

The School will inform staff, students, and parents of its processes relating to Child Protection via the publication of this policy and the School's Student Risk Management Policy. Processes relating to Reporting Concerns of Harm and Abuse are accessible on the School website and will be available on request from the School's administration.

Students and parents will be made aware of this policy in the respective enrolment package and school intranet site.

Each new staff member will be made aware of the policy as part of their induction when starting at the School.

## **Training**

The School will train its Staff in processes relating to the health, safety and conduct of Staff and students on their induction and will refresh training annually or as the policy is updated. Annual online training is required of all staff and completion is monitored by the school counsellor and Human Resources. This training is refreshed annually with evidence of this training provided to the Board of Trustees. All staff undertake an induction process, and this is also recorded by Human Resources.

A compliance report will be prepared by the second Board meeting of the year.

## **Complaints Procedure**

Suggestions of non-compliance with the School's processes may be submitted as complaints under the School's Complaint Handling Policy.

## **Responsibilities**

The Headmaster, the Board of Trustees and School Counsellor are responsible for reporting child safety concerns based on this policy to the appropriate external organisation.

The Headmaster is responsible for:

- reporting concerns to the appropriate external authority: Police, Child Safety and/or Family and Child Connect;

The School Counsellor is responsible for:

- maintenance, review, and coordination of the implementation of this policy and associated procedures and guidance;

All staff are responsible for:

- complying with this policy and relevant supporting procedures and resources;
- reporting any behaviours or concerns that may constitute as child abuse to the Headmaster;
- maintaining and respecting the confidential nature of child protection reporting.

## **Implementing the processes**

The School will ensure it is implementing processes relating to the health, safety and conduct of staff and students by auditing compliance with the processes annually.

## Review

The School will ensure compliance with legislation relevant to Child Protection and review this policy annually or earlier if:

- The procedure, processes and arrangements change;
- Application of the policy fails to deliver the required outcomes;
- There are changes in requirements, legislation and standards; or
- An area for improvement is identified and agreed.

Note: Reporting under this policy fulfills the obligations for reporting a child sexual offence that is being or has been committed against a child by an adult under the *Criminal Code Act 1899* (Qld) s.229BC.20

## Section 5 – Procedures, Resources and References

Refer to the following documents and resources which are established in accordance with this policy:

- Child Protection Act 1999 (Qld);
- Child Safe Organisations Act 2024 (Qld);
- Child Protection Regulation 2023 (Qld);
- Criminal Code Act 1899 (sections 229BB and 229BC)
- Education (General Provisions) Act 2006 (Qld);
- Education (General Provisions) Regulation 2017 (Qld);
- Education (Accreditation of Non-State Schools) Act 2017 (Qld);
- Education (Accreditation of Non-State Schools) Regulation 2017 (Qld);
- Education (Queensland College of Teachers) Act 2005 (Qld);
- Working with Children (Risk Management and Screening) Act 2000 (Qld);
- Working with Children (Risk Management and Screening) Regulation 2020; and
- The National Redress Scheme;
- Reporting Concerns of Harm and Abuse Procedure;
- Student Risk Management Policy;
- Work and Health and Safety Policy (for the Work Health and Safety Act 2011(QLD));
- Complaint Handling Policy;
- National Quality Standards; and

### Quality Area 2: Children’s Health and Safety

2.2	Safety	Each child is respected.
2.2.1	Supervision	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard.
2.2.2	Incident and emergency management	Plans to effectively manage incidents and emergencies are developed in consultation with relevant authorities, practiced and implemented.
2.2.3	Child Protection	Management, educators and staff are aware of their roles and responsibilities to identify and respond to every child at risk of abuse or neglect.

- Education and Care Services National Law and National Regulations.

### Education and Care Services National Law and Regulations

S. 162A	Child protection training
S.165	Offence to inadequately supervise children
S. 166	Offence to use inappropriate discipline
S.167	Offence relating to protection of children from harm and hazard

Education and Care Services National Law and Regulations	
S. 174	Offence to fail to notify certain information to Regulatory Authority
S. 175	Offence relating to requirement to keep enrolment and other documents
84	Awareness of child protection law
86	Notification to parents of incident, injury, trauma and illness
87	Incident, injury, trauma and illness record
145	Staff records
149	Volunteers and students
155	Interactions with children
168	Education and care service must have policies and procedures
170	Policies and procedures to be followed
175	Prescribed information to be notified to Regulatory Authority
176	Time to notify certain information to Regulatory Authority

## Section 6 - Definitions

For the purposes of this Policy, the following definitions apply:

Harm	<p>Section 9 of the <i>Child Protection Act 1999</i> – defines “Harm”, to a child, as any detrimental effect of a significant nature on the child’s physical, psychological, or emotional wellbeing.</p> <ul style="list-style-type: none"> <li>• It is immaterial how the harm is caused;</li> <li>• Harm can be caused by: <ul style="list-style-type: none"> <li>○ physical, psychological, emotional abuse, or neglect; or</li> <li>○ sexual abuse or exploitation.</li> </ul> </li> <li>• Harm can be caused by: <ul style="list-style-type: none"> <li>○ a single act, omission, or circumstance; or</li> <li>○ a series or combination of acts, omissions, or circumstances.</li> </ul> </li> </ul>
Child in need of protection	<p>Section 10 of the <i>Child Protection Act 1999</i> - A “child in need of protection” is a student who:</p> <ul style="list-style-type: none"> <li>• has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and</li> <li>• does not have a parent able and willing to protect the child from the harm.</li> </ul>
Sexual Abuse	<p>Section 364 of the <i>Education (General Provisions) Act 2006</i> - “Sexual abuse”, in relation to a relevant person, includes sexual behaviour involving the relevant person and another person in the following circumstances:</p> <ul style="list-style-type: none"> <li>• the other person bribes, coerces, exploits, threatens, or is violent toward the relevant person;</li> <li>• the relevant person has less power than the other person; and</li> <li>• there is a significant disparity between the relevant person and the other person in intellectual capacity or maturity.</li> </ul>
Adult	<p>Section 229BC of the <i>Criminal Code Act 1899</i> definition of adult includes students 18 years or over, parents/guardians and volunteers of the school.</p>

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Teacher	Teacher means an approved teacher under the Education (Queensland College of Teachers) Act 2005 employed at a school.
Staff	in this policy, refers to full-time, part-time, permanent, fixed term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements.
Staff Registered with AHPRA	Means they are currently registered with the Australian Health Practitioner Regulation Agency, examples would be nurses, psychologists, physiotherapists.

## Section 7 – Document Information

A complete list of the documents' metadata including author information, and approval and review dates is recorded in SharePoint. A summary of the current change is provided in the table below:

Version	Details of Change
1.0	New policy
2.0	Minor format changes
3.0	Minor format changes
4.0	Minor format changes
5.0	Review date change
6.0	Updates to Policy
7.0	Updates to Policy
8.0	Updates to Policy to include OSHC Service
9.0	Updates to Policy, Policy name changed