

POLICY

Child Risk Management Strategy

1. Purpose: The purpose of this strategy is to eliminate and minimise risk to student safety and wellbeing of all students, in alignment with the Lutheran Education Queensland (LEQ) commitment to providing safe, supportive, and legal compliant learning environments.

2. Scope: This strategy applied to all students and all employees, full-time, part-time, permanent, fixed-term and casual as well as contractors, volunteers, and individuals undertaking work experience or vocational placement at LORDS

Status: Approved

Supersedes: 27/02/2025

Authorised by: School Council

Date of Authorisation: 26/03/2026

Review: Annually

Next Review Date: 26/03/2027

Distribution:	Website:	Required – Schools and Colleges
	Staff:	Required – Councils, Schools and Colleges
	Parents:	Recommended – Parents’ Portal
	Students:	Recommended – Student Portal

3. Commitment to Child Safety

LORDS is committed to providing safe, inclusive, and nurturing environments where every child and young person is protected from harm and supported to flourish.

We affirm that all children are created in the image of God, deeply loved, inherently worthy, and deserving of dignity, respect, and care. Our approach to child safety is grounded in Gospel's call to uphold justice, protect the vulnerable, and foster communities of compassion and belonging.

We uphold the rights outlined in the Human Rights Act 2019 (Qld), including every child's right to be safe, to participate in decisions that affect them, and to enjoy their culture, language, and community life. We especially affirm that cultural rights of Aboriginal and Torres Strait Islander children as set out in Section 20 of the Act, and we embed culturally safe, trauma-informed and inclusive practice throughout our service delivery.

This commitment informs our policies, procedures, and everyday interactions. It is reflected in our safeguarding frameworks, staff conduct, governance structures, and the way we partner with families and communities. We strive to ensure that every child in our car feels safe, valued, and supported spiritually, emotionally, physically, and socially.

In practice, LORDS acts in accordance with the *Working with Children (Risk Management and Screening) Act 2000* (Qld) ("the **Act**") to promote the safety and wellbeing of students. This includes implementing the measures outlined below.

3.1 Child Participation & Empowerment

LORDS actively involves students in shaping a safe learning environment. We provide age-appropriate information about their rights, encourage feedback, and ensure students have accessible, child-friendly ways to raise concerns. Students are supported to participate in decisions affecting their safety and wellbeing.

4. Cultural Safety

LORDS is committed to creating culturally safe environments where all children feel respected, valued, and able to express their identity. We embed culturally responsive practices, monitor cultural safety, and ensure staff receive training in cultural capability.

5. Code of Conduct

At LORDS we expect our employees to conduct themselves as follows:

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

Specific responsibilities include:

- Employees should avoid situations where they are alone in an enclosed space with a student.
- 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.

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

This commitment is evidence of LORDS fulfilment of the requirements of Schedule 1 s.2(2).

6. Recruitment, Selection, Training and Management Procedures

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

- Ensure that its recruitment and selection procedures act to reduce the risk of harm to children from employees via:
 - Accurate position 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), whether a Blue Card 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.
 - Advertising the position with a clear statement about the school'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 and the requirement to disclose any information relevant to the candidates' eligibility to engage in activities including children.
 - A selection process that includes assessing the application via an interview process and referee and other checks (as identified above) based on the accurate position description.
 - A probationary period of employment, which allows the school 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:
 - Management processes that are consistent, fair and supportive.
 - Performance management processes to help employees to improve their performance in a positive manner.
 - Supportive processes for staff when they are experiencing challenges, such as mentoring, mediation, conflict resolution, coaching, additional training, and external support and counselling services.
 - An induction program which thoroughly addresses the school'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.
 - Training new and existing staff on an ongoing basis to enhance skills and knowledge and to reduce exposure to risks, as follows:
 - the school's policies and procedures
 - identifying, assessing and minimising risks to students
 - handling a disclosure or suspicion of harm to a child.
 - Keeping a record of the training provided to employees.
 - Exit interviews to assist the school to identify broader issues of concern that may impact on the safety and wellbeing of students at the school.

This commitment is evidence of LORDS fulfilment of the requirements of Schedule 1 s.2(3).

7. Handling Disclosures or Suspicions of Harm or Abuse

Any of the types of concerns or reports below must be reported and managed under the LORDS Child Protection Policy as follows:

- all staff with concerns about sexual abuse or likely sexual abuse or a child sexual offence committed by another person
- teachers, nurses and early childhood education and care professionals with concerns 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 or abuse, including psychological, emotional abuse, neglect and self-harm, all staff members must follow the reporting process set out in the LORDS Child Protection Policy, for the relevant type of known or suspected conduct ([link to the school Child Protection Policy](#)).

Any report made under this section or the LORDS Child Protection Policy will fulfill the reporting obligations of all adults (including students 18 years or older, parents/guardians and volunteers) under the *Criminal Code Act 1899*.

Furthermore, and in accordance with section 76 of the *Education (Queensland College of Teachers) Act 2005*, the Principal of LORDS will report to the Queensland College of Teachers any investigations into allegations of harm caused, or likely to be caused, to a student because of the conduct of the relevant teacher at the school.

This commitment is evidence of LORDS fulfilment of the requirements of Schedule 1 s.2(4).

Consultation and Support in Responding to Child Protection Concerns

Consultation is a key part of responding to student safety concerns. Staff may formally confer with appropriate colleagues (e.g. Principal or leaders responsible for student wellbeing) to determine whether a reasonable suspicion of abuse, harm, or inappropriate behaviour exists. Conferral supports informed decision-making but does not replace the legal obligation to report.

Staff must not consult with anyone potentially involved in the concern and must not notify the source or any person implicated. Confidentiality is critical, information must only be shared with relevant colleagues and only as needed to support student safety.

Conferral may provide important context, such as:

- Additional details about the student, family, or staff member
- Clarification of whether harm is “significant”
- Insight into a parent’s ability and willingness to protect

Staff are encouraged to use decision-support tools including:

- Queensland Child Protection Guide
- Code of Conduct for guidance on inappropriate behaviour
- Queensland College of Teachers professional standards
- Relevant materials documented contacts available.

Note: Consultation informs decisions but does not remove the staff member’s duty to report under Student Protection Processes.

8. Managing Breaches of this Child Risk Management Strategy

LORDS 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 Child Protection Policy, Employee Code of Conduct, Complaints Handling Policy and Procedures and Enterprise Bargaining Agreement or equivalent, and this is evidence of fulfilment of the requirements of Schedule 1 s.2(5).

9. Implementing and Reviewing the Child Risk Management Strategy

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) relating to implementation.

The introduction to this Child Risk Management Strategy and the “Compliance and Monitoring” section below state LORDS commitment to reviewing the Strategy annually and are evidence of fulfilment of the requirements of the Schedule 1 s.2(6)(a) relating to review.

9.1 Blue Card Policies and Procedures

LORDS 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, LORDS will:

- Require relevant prospective or current employees, volunteers, trainee students and school board members to have working with children authority and check the validity and appropriateness of any currently held notices, in accordance with LORDS position descriptions and the Act prior to the commencement of their engagement.
- Not allow a person to continue to work with children if their working with child authority is cancelled or suspended or a negative notice is received after a change of police information.
- Have all relevant prospective employees and volunteers engaging in Restricted Employment acknowledge and sign a [Restricted Persons Declaration Form](#) declaring they are not a restricted person prior to commencing their engagement.
- Not allow a person relying on an exemption to continue to work with children if they become a restricted person.
- Link and unlink individuals as they commence and conclude their engagement with the school.
- Appoint a school contact person who will be responsible for managing the working with child screening process and all related documentation and records.
- Keep written records of all the above actions, decisions and outcomes, including the dates of expiry for working with children authority.
- Ensure that all information in relation to working with children authority is kept confidential.
- Act to remind employees to keep their working with children authority up to date and apply for a renewal prior to expiry.
- Take appropriate action if an employee, volunteer, trainee student or school board member fails to submit a renewal application prior to their working with children authority expiring.
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This commitment is evidence of LORDS fulfilment of the requirements of Schedule 1 s.2(6)(b).

9.2 Organisational Responsibilities under the Working with Children Act

LORDS complies with organizational obligations under the Working with Children Act, including reporting systemic risks and ensuring restricted persons are not engaged in restricted employment.

10. High Risk Management Plans

LORDS 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. LORDS will utilise various risk management tools to assist it in this process and will keep appropriate records of decisions made and actions taken in relation to risks to children.

This commitment is evidence of LORDS fulfilment of the requirements of Schedule 1 s.2(7).

11. Online Safety and Digital Environments

LORDS identifies and manages risks in online environments, including digital communication, learning platforms, and social media. Staff must follow safe online conduct expectations, and students receive education on digital safety and respectful online behaviour.

12. Strategies of Communication and Support

LORDS commitment to making this Child Risk Management Strategy available to students, parents and employees via its, employee handbook, school intranet site is evidence of fulfilment of the requirements of Schedule 1 s.2(8)(a).

LORDS 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 staff, and this is evidence of fulfilment of the requirements of Schedule 1 s.2(8)(b).

12.1 Family and Community Engagement

LORDS partners with families and communities to promote child safety. We provide accessible information about our child-safe practices, consult with families on safety matters, and work collaboratively with Aboriginal and Torres Strait Islander communities to ensure culturally safe practices.

13. Child Focused Complaints and Reporting Pathways

Complaints processes are child-focused, accessible, and provide multiple safe avenues for raising concerns. Students and families are protected from victimization, and complaints are managed transparently with clear timeframes.

14. Responsibilities

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

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

15. Compliance and Monitoring

LORDS is committed to the annual review of this Strategy. LORDS will also record, monitor and report to the school board, and the Senior Executive Team regarding any breaches of the Strategy.

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

16. Continuous Improvement and Review

LORDS monitors the implementation of this Strategy, evaluates its effectiveness, and seeks feedback from students, families, staff, and community partners. Improvements are documented and incorporated into annual reviews.

17. Related Documents

- LORDS Blue Card Register
- LORDS Child Protection Policy
- LORDS Child Protection Procedures
- LORDS Complaints Handling Policy
- LORDS Complaints Handling Procedures
- LORDS Employee Code of Conduct
- LORDS Risk Management Framework

18. Helpful Links

- Independent Schools Queensland's [Child Protection Decision Support Trees](#)
- [Blue Card Services resources](#)

19. 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
All staff	Sexual	Awareness or a suspicion Sexually abused or likely to be sexually abused	Principal or ED of LEQ, through to police immediately	EGPA sections 366 and 366A
Principal	Sexual	Awareness or a suspicion Sexually abused or likely to be sexually abused	Police immediately and copy to ED of LEQ immediately	EGPA sections 366 and 366A
Teacher/ Nurse (if school has nurse)	Sexual and physical	Significant harm; & Parent may not be willing and able	Confer with principal, report to Child Safety	CPA sections 13E and 13G
All staff	Physical, psychological, emotional, neglect, exploitation	Significant harm, & Parent may not be willing and able	Principal, through to Child Safety	Accreditation Regulation section 16
All staff	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
Principal	Any	Not a level that is otherwise reportable to Child Safety, refer without consent	Family and Child Connect	CPA Sections 13B and 159M
Employing authority (Principal/Board)	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	QCT sections 76 and 77
Any member of the public	Any	Significant harm & Parent may not be willing and able	Child Safety	CPA section 13A
Any adult (includes students 18 years or older, parents/guardians and volunteers)	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 (b) at the relevant time, the child is or was— (i) under 16 years; or (ii) a person with an impairment of the mind.	Police	Criminal Code section 229BC

PROVIDE ALL INFORMATION YOU HAVE WHICH LED TO THE SUSPICION OF HARM OR ABUSE (Attach extra pages if necessary).

Details of any harm and/or sexual abuse to the student – 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 NO

Name of first responder making report if not the Principal:

Position:	Signature:	Date:
Principal:	Signature:	Date:
Principal's email address:		
Response requested by school:		

ACTION TAKEN

Form was emailed to (please tick which agencies the form was sent to):	<input type="checkbox"/>	Queensland Police Services (QPS) Email: goldcoast.cpiu@police.qld.gov.au
	<input type="checkbox"/>	Department of Families, Seniors & Disability Services and Child Safety Email: SEIntake@cs.cyjma.qld.gov.au
	<input type="checkbox"/>	Family and Child Connect
	<input type="checkbox"/>	Queensland College of Teachers
	<input type="checkbox"/>	LEQ Executive Director – copy of report of suspected sexual harm

(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.