

# Child Risk Management Strategy

Reviewed: 24th February 2026



**PACIFIC**  
LUTHERAN  
COLLEGE

### 1. Preamble

#### 1.1 Purpose

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

#### 1.2 Scope

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.

#### 1.3 Authorisation

The College Council is responsible for authorising this policy.

#### 1.4 Responsible Officer

The Director of Staff is responsible for reviewing this policy and its procedures.

#### 1.5 Communication

This policy and its procedures will be communicated via staff email, staff intranet, staff meetings, newsletters and College website.

#### 1.6 Storage

This policy and its procedures will be stored in the Staff Handbook on the College network and within the Enterprise Risk Management website.

#### 1.7 Linked Documents

This policy and its procedures is linked with the Child Protection Policy and Procedure

#### 1.8 Review Date

This policy and its procedures are to be reviewed on an annual basis as recorded in the Policy and Procedures Register. This policy was approved in 2016 by College Council and reviewed on 14/03/17, 12/03/19, 10/03/20, 9/03/21, 8/02/22, 14/6/22, 14/2/2023, 16/04/24, 13/8/24, 11/2/25, 24/2/25, 11/11/25 and 24/02/26

### 2. Definitions and Legislation

#### Relevant Legislation

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Working with Children \(Risk Management and Screening\) Regulation 2020 \(Qld\)](#)
- [Child Protection Act 1999 \(Qld\)](#)
- [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 Services for Overseas Students \(ESOS\) Act 2000 \(Cth\)](#)
- [Education \(Overseas Students\) Regulation 2018 \(Qld\)](#)
- [Education \(Queensland College of Teachers\) Act 2005 \(Qld\)](#)
- [Education and Care Services National Law \(Queensland\) Act 2011 \(Qld\)](#)
- [Education and Care Services National Law Regulation 2022 \(Qld\)](#)
- [Criminal Code Act 1899 \(Qld\)](#)
- Blue Card Services [Child and Youth Risk Management Strategy Toolkit](#)
- [Restricted Person Declaration Form](#)

### 3. Commitment to Child Safety

Pacific Lutheran College 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 the 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 the cultural rights of Aboriginal and Torres Strait Islander children as set out in Section 28 of the Act, and we embed culturally safe, trauma-informed, and inclusive practices 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 care feels safe, valued, and supported spiritually, emotionally, physically, and socially.

In practice, Pacific Lutheran College acts in accordance to 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

Pacific Lutheran College 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

Pacific Lutheran College 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 Pacific Lutheran College 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 children and young people. 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 Pacific Lutheran College's fulfilment of the requirements of Schedule 1 s.2(2).

### 6. Recruitment, Selection, Training and Management Procedures

Pacific Lutheran College is committed to recruiting, selecting, training and managing employees in such a way that limits risks to students. In particular, Pacific Lutheran College 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 Pacific Lutheran College's 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 should be reported and managed under the Pacific Lutheran College Child Protection Policy and Procedure, 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 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 Pacific Lutheran College Child Protection Policy, for the relevant type of known or suspected conduct.

Any report made under this section or the Pacific Lutheran College's 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 Pacific Lutheran College will report to the Queensland College of Teachers any investigations into allegations of harm caused, or likely to be caused, to a child because of the conduct of a relevant teacher at the school.

This commitment is evidence of Pacific Lutheran College's 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**

Pacific Lutheran 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 Child Protection Policy and Procedures, Code of Conduct, Grievance Policy and Procedure and Procedure and Enterprise Bargaining Agreement, 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 Pacific Lutheran College’s 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

Pacific Lutheran 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, Pacific Lutheran College 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 Pacific Lutheran College 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 Person 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.
- The Business Manager, Director of Staff and HR and Compliance Officer will act as school contact persons 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.

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

### 9.2 Organisational Responsibilities under the Working With Children Act

Pacific Lutheran College complies with organisational 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

Pacific Lutheran 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. Pacific Lutheran College 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 Pacific Lutheran College's fulfilment of the requirements of Schedule 1 s.2(7).

### **11. Online Safety and Digital Environments**

Pacific Lutheran College 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**

Pacific Lutheran College's commitment to making this Child Risk Management Strategy available to students, parents and employees via the Staff Handbook, Parent Lounge and NAV is evidence of fulfilment of the requirements of Schedule 1 s.2(8)(a).

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

#### **12.1 Family and Community Engagement**

Pacific Lutheran College 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 victimisation, and complaints are managed transparently with clear timeframes.

### **14. Responsibilities**

Pacific Lutheran College 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 Pacific Lutheran College are responsible for acting in compliance with this Child Risk Management Strategy and related policies and procedures.

### **15. Compliance and Monitoring**

Pacific Lutheran College is committed to the annual review of this strategy. Pacific Lutheran College will also record, monitor, and report to the College Council, regarding any breaches of the Strategy.

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

### **16. Continuous Improvement and Review**

Pacific Lutheran College 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

- Pacific Lutheran College Child Protection Policy and Procedures
- Pacific Lutheran College Blue Card Register
- Pacific Lutheran College Risk Management Framework
- Pacific Lutheran College Grievance Policy and Procedures
- Pacific Lutheran College Staffing Code of Conduct
- Pacific Lutheran College Professional Learning Policy
- Pacific Lutheran College Blue Card Procedures
- Pacific Lutheran College Social Media Policy for Staff
- Pacific Lutheran College eSmart and Social Media Policy for Students
- Pacific Lutheran College Restricted Person Declaration Form

### 18. Helpful Links

- Independent Schools Queensland's [Child Protection Decision Support Tree](#)
- [Blue Card Services resources](#)
- Department of Families, Seniors & Disability Services and Child Safety [Child Protection Guide](#) resource
- Department of Children, Youth Justice and Multicultural Affairs [Child Protection Guide](#) resource
- Queensland Police Service 000 (in emergency)
- Kawana Waters Police Station (07) 5413 8700
- Child Safety After Hours Centre 1800 177 135 or (07) 3235 9999
- Family and Child Connect 13 32 64 or at <http://www.familychildconnect.org.au>
- Queensland College of Teachers (07) 3377 4777

### 19. Appendices

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

## Appendix 1

### 20. 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 sends copy to police immediately and copy to LEQ ED 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 LEQ ED immediately                         | EGPA sections 366 and 366A          |
| Teacher<br>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<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

### Report of Suspected Harm or Sexual Abuse

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

| 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 disability verified under NCCD:<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"/> |                          |

# Child Risk Management Strategy

## Policy and Procedure



|  |  |                                      |
|--|--|--------------------------------------|
| <b>PERSON ALLEGED TO HAVE CAUSED THE HARM OR ABUSE</b>   |  |                                      |
| <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 (Attach extra pages if necessary).</b>   |  |                                      |
| <p><b>Details of any harm and/or sexual abuse to the student – please include:</b> 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.</p> |  |                                      |
| <p><b>Please indicate the identity of anyone else who may have information about the harm or abuse</b></p>   |  |                                      |
| <b>Additional information provided as an attachment    YES <input type="checkbox"/>    NO <input type="checkbox"/></b>   |  |                                      |

|  |                   |              |
|--|-------------------|--------------|
| <b>Name of first responder 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>                                |                   |              |

# Child Risk Management Strategy

## Policy and Procedure

| ACTION TAKEN   |                          |  |
|--|--------------------------|--|
| 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 Families, Seniors & Disability Services and Child Safety (Child Safety Services) |
|  | <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.**

### Document Control

| Document Control            |  |
|-----------------------------|--|
| <b>Author</b>               | Lutheran Education Queensland  |
| <b>Owner</b>                | College Council  |
| <b>Date Created</b>         | 2016   |
| <b>Classification</b>       | External publication, legislative requirement  |
| <b>Review Cycle</b>         | To be reviewed annually.<br>14/03/17, 12/03/19, 10/03/20, 9/03/21, 8/02/22, 14/6/22, 14/2/2023, 16/04/24, 13/8/24, 11/2/25, 24/2/25, 11/11/25, and 24/02/26. |
| <b>Last Reviewed By</b>     | College Council  |
| <b>Last Date Reviewed</b>   | February 2026  |
| <b>Next Review Due Date</b> | January 2027   |

# Child Risk Management Strategy

## Policy and Procedure



### Version Control

| Version | Date of Approval | Approved By     | Description of Change  |
|---------|------------------|-----------------|--|
| 1.13    | November 2025    | College Council | A number of amendments as directed from LEQ.                 |
| 1.14    | February 2026    | College Council | Additional sections added: 3.1, 4, 9.2, 11, 12.1, 13 and 16. |