

PROCEDURES: CHILD SAFE OPERATIONS

VERSION 1.0

Every child has the right to be safe and feel safe.

CONTENTS

Introduction	2
Child Safe Action Plans	3
Child Safe Committee (CSC)	7
Public Commitment to Child Safety	10
Publication of Documents	10
Child Safe Advocates (formerly Student Protection Officers)	10
Child Safe Risk Management	12
Child Safe Human Resource Management	14
People Management	14
Recruitment and Selection	14
Management of Working with Children Authorities and Register	17
Induction and Training	21
Assurance and Learning	23
Notification of Compliance	23
Internal Review of Child Safe Responses	23
Good Practice Report	25
Assurance and Learning Review	25
Assurance and Learning Audit	25
Support	27
Practice Resources	27
Appendix A: Common high-risk activities	28
Procurement of a Business, or Hiring out use of School or ECS Facilities	
International Students, including Home Stay	
Boarding, Billeting and other Overnight Accommodation (including camps)	

INTRODUCTION

These **Procedures: Child Safe Operations** (the procedures) are provided to enable Anglican schools, and education and care services (ECS) implement the **Child Safe Anglican Education Policy** (the policy). These procedures should be read together with the policy.

These procedures are provided by the Anglican Schools Commission (ASC) on behalf of the Anglican Church Southern Queensland (ACSQ).

IMPLEMENTATION

Decisions and actions by schools and ECS will be informed by these procedures. When specific instructions aren't provided, schools and ECS are to seek advice from the ASC and apply the following principles:

- Consider children's safety, wellbeing and best interests using current, evidence-based knowledge and resources.
- Act lawfully and use good judgement.
- Work respectfully in partnership to achieve the best outcomes for children, strengthening family and community safety and support networks.
- Be accountable by documenting decisions and the reasoning behind them.

Plans

CHILD SAFE ACTION PLANS

Child Safe Action Plans are a cornerstone of Child Safe Anglican Education. As such each school, ECS and any other Child Safe Entity operated by the school or ECS must create and apply a Child Safe Action Plan.

CHILD SAFE ACTION PLANS

Child Safe Action Plans are a cornerstone of **Child Safe Anglican Education**. As such each school, ECS and any other Child Safe Entity operated by the school or ECS must create and apply a Child Safe Action Plan.

Each Child Safe Action Plan is supported by a Child Safe Committee (CSC). Together, these provide local direction and oversight for how each Child Safe Entity implements the Child Safe Standards, the Universal Principle and other mandated requirements related to child safety.

Child Safe Entities are defined in Schedule 1 of the *Child Safe Organisations Act 2024*. In addition to education, and early childhood education and care services, the following Entities most commonly operated within schools are: accommodation or residential services (including home stay and boarding), religious bodies, health services, services or activities provided primarily for children, commercial services for children and transport/transport related services for children.

A **Child Safe Action Plan** may be for one, or a group of, Child Safe Entities (e.g. a school, an accommodation service and each ECS can either have a combined Plan or separate Plans). This is based on local operating environments, and is to be determined by the Principal, and for ECS the Nominated Supervisor, in consultation with the CSC.

Every **Child Safe Action Plan** is to address each of the 10 legislated Child Safe Standards, and within each Standard the Universal Principle, along with mandatory requirements related to child safety.

Each **Child Safe Action Plan** has two complimenting parts:

1. **Child Safe Action Plan: Operations** (for public publication)
2. **Child Safe Action Plan: Improvements** (for internal use)

To assist in the development and review of each Action Plan, the ASC provides:

- Child Safe Procedures (Responses and Operations)
- Compliance Support Index. This index includes mandated requirements specific to child safety within school and ECS operations and is intended to be kept current, with revised versions published as needed.
- Practice and Education Resources, including templates. In addition to the Resources listed throughout the procedures, the ASC will endeavour to publish and update on at least an annual basis:
 - a list of products it provides that support schools and ECS to demonstrate compliance with the Standards and Universal Principle.
 - a list of external resources as reference material for schools and ECS to consider in their implementation of the Standards and the Universal Principle.

CHILD SAFE ACTION PLAN: OPERATIONS

The Operations plan is to be a publicly available document and describes what actions are currently being taken or scheduled to be taken to comply with each Standard and the Universal Principle. In preparing the Operations plan, Child Safe Entities are to:

- Include actions taken to comply with applicable mandatory requirements relevant to child safety, including but may not be limited to, those identified in the **Compliance Support Index**.
- Include actions taken to implement the Child Safe Standards, the Universal Principle and related child safety requirements within each Child Safe Entity's approach to risk assessment and management.
- Consider additional content, within the **Compliance Support Index**, noting:
 - QFCC Key Action Areas are required to be considered in the context of the operating environment.
 - Indicators and other relevant content are examples that may also be relevant to consider.
 - Application of a risk management approach is provided for each Standard.
- The **Child Safe Anglican Education Policy** and associated **procedures** include content that is relevant to list as being implemented in the Action Plan (e.g. the Public Commitment, Child Safe Committee and Child Safe Advocates).
- Each school and ECS implements policies, procedures, systems and processes that will be relevant to list, as applicable to each Standard and the Universal Principle.

CHILD SAFE ACTION PLAN: IMPROVEMENTS

The Improvements plan is for internal use only.

The Improvements plan recognises continuous improvement is a fundamental, acceptable and necessary part of Child Safe Entities. It describes what actions are planned to be taken to improve operations as relevant to each Standard and the Universal Principle.

ADMINISTRATION

KEY TIMEFRAMES

- The Child Safe Action Plan is to be reviewed and reapproved on an annual basis. This includes republishing of the Operations Plan.
- The progress of the Action Plan is to be reported by the CSC to the Nominated Supervisor (ECS), Principal (schools) and school Council/ECS Management Committee, at least once during each subsequent term (2, 3, and 4).

RESPONSIBILITY

- The following persons are responsible for ensuring the **Child Safe Action Plan** is developed, implemented, reported on and reviewed.
 - In schools, the Principal
 - In ECS, both the Nominated Supervisor and delegate of the Approved Provider

ENDORSEMENT AND APPROVAL

Schools

- The Action Plan is endorsed by the School Council. Where the school does not have a Council, the Action Plan is endorsed by the school's Board or governing body.
- Action Plans are approved by the school's Principal each year, before the end of term 1 (by the end of February for 2026¹).

Education & Care Services

- For co-located ECS the Action Plan is endorsed alongside the school's Plan.
- For other ECS the Action Plan is endorsed by the ECS Management Committee.
- For all ECS, Action Plans are approved by the delegate of the ECS's Approved Provider each year, before the end of term 1 (by the end of February for 2026).

ASSURANCE AND CONTINUOUS IMPROVEMENT

- Implementation of the Action Plan is monitored by the CSC, with progress reported by the CSC at least once during terms 2, 3, and 4 to the Nominated Supervisor (ECS), Principal (schools) and School Council/ECS Management Committee. Progress includes:
 - Completion of actions
 - Delay to approved timeframes for commencement or completion of actions
 - Request to amend or delete actions
- New actions can be added to the Action Plan. These changes are reflected and endorsed in termly reports. They will then be formally added to the Action Plan during the annual approval process in the next Term 1.
- Before the end of term 1 each year, the person responsible for approving the Child Safe Action Plan (schools: Principal, ECS: delegate of the Approved Provider), is required to write to the Chair of the school or ECS governing body, confirming:
 - The Child Safe Action Plan has been approved for that year.
 - That the Child Safe Action Plan: Operations includes actions that reflect the school or ECS is meeting all mandatory requirements as identified in the Compliance Support Index and has been doing so for the preceding twelve months, or when the requirement came into effect, whichever is the later date.
 - If a requirement has not been met, the advice will include what steps have been taken to rectify the issue.

Note: Where the governing body is ACSQ, advice will be provided through the ASC, via the Executive Director.



Practice Resources:

- Child Safe Action Plan: Operations template
- Child Safe Action Plan: Improvements template
- Child Safe Action Plan: ASC Supporting Products
- Child Safe Action Plan: Monitoring tool
- Child Safe Committee: Report template

¹This timeframe is to support the requirement for schools and ECS to demonstrate they are working towards becoming compliant from 1 January 2026.

CHILD SAFE COMMITTEE (CSC)

Child Safe Action Plans are supported by a Child Safe Committee (CSC).

Purpose

The CSC's purpose is to coordinate the development, implementation, reporting and review of all related **Child Safe Action Plans**. This includes the implementation of the **Child Safe Anglican Education Policy** and related **procedures** within all operations.

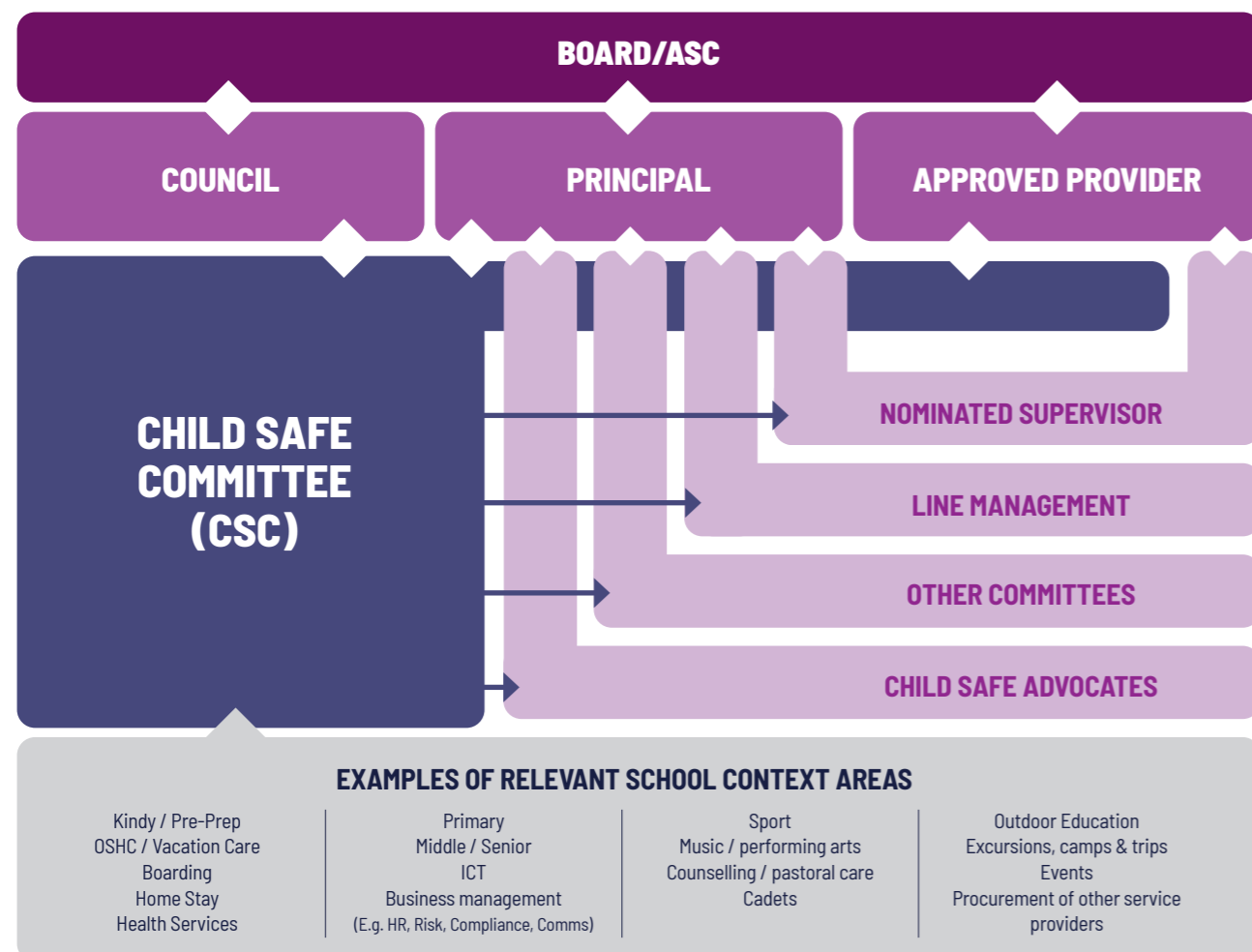
Administration

The information below describes the administration by which the CSC is established in each school and co-located ECS.

In other ECS, the CSC can also be either a sub-committee of, or integrated into, the ECS's Management Committee. Where this occurs, the Nominated Supervisor and delegate of the Approved Provider is responsible for ensuring the work of the CSC is consistent with relevant administration matters below.

Governance

The following Figure represents the governance structure that CSC's sit within schools and co-located ECS.



³Within operations, the Child Safe Action Plan and Committee replace the previous requirement for a Child and Youth Risk Management Strategy and the associated Committee.

Membership

The CSC is to have membership that represents each Child Safe Entity relevant to the Action Plan/s and each area within that Entity that provides services or activities to children.

Reminder: In addition to schools and ECS, examples of Entities include accommodation or residential services (including home stay and boarding), religious bodies, health services, services or activities provided primarily for children, commercial services for children and transport/transport related services for children.

Each Principal is responsible for making decisions about appropriate membership of their CSC based on the structure of the school. Consideration and decisions on membership will be reflected in the CSC's Terms of Reference.

Terms of Reference

Each CSC is to have a Terms of Reference, including a list of roles and membership, calendar and standard agenda approved by the Principal each year.

To support review and continuous improvement throughout the year, the following topic focus areas are recommended for consideration as a minimum, noting other topics may be important to include to reflect local operations and opportunities for improvements:

- **Term 1 - People focus:** administration of CSC, confirmation of Action Plan (for approval), and Standards 5 and 7
- **Term 2 - Child focus:** Standards 2, 3 and 4
- **Term 3 - Operations focus:** Standards 8 and 10
- **Term 4 - Improvement focus:** Standards 1, 6 and 9, and finalisation of Action Plan for following year

Attendance of members at meetings is expected, with a proxy to attend by exception.

See **Practice Resource: Child Safe Committee: Terms of Reference guidance**.

Roles

Chair:

Recommended to be a member of executive or senior leadership to help embed connection between the CSC and school executive, the Chair is responsible for leading the CSC, including ensuring appropriate reporting on the progress of the Action Plan to the Nominated Supervisor (ECS), Principal (schools) and the School Council/ECS Management Committee, at least once per term.

Secretariate:

Provides administrative support required for the CSC to operate effectively, including record keeping and administration tasks.

Lead Child Safe Advocate⁴ (Formerly a Lead Student Protection Officer):

This role provides leadership support to the Principal and other Child Safe Advocates in the administration and assurance of the Procedures: Child Safe Responses. This role is suggested to be a member of executive or senior leadership, who may or may not also be the Chair of the CSC. See further information on Child Safe Advocates below.

School Council Member

A member of the school Council is recommended to be to be a member of the CSC to support strong connection with school leadership.

⁴Previously referred to as Student Protection Officers.

RAP Committee Chair:

The RAP Committee Chair is recommended to be a member of the CSC. Given the importance of cultural safety and the requirement for the Universal Principle to be embedded in each of the Child Safe Standards⁵ it is important to establish and maintain integrated connections between Child Safe and RAP governance and practices.

Risk Management Representative:

At least one person who has a lead role in supporting the school or ECS broader risk management and assessment processes is recommended to be a member of the CSC. Given the importance of risk management in managing children's safety it is important to establish and maintain integrated connections between related governance and practices.

General Members:

- Members may represent more than one relevant context area (see Figure in Governance).
- Members are expected to be able to facilitate the implementation of the Action Plan for that area and represent that area within discussions.
- If a CSC includes an ECS, the Nominated Supervisor of that ECS is to be a member of the CSC.
- Members are responsible for:
 - Actively participating in work, meetings and reporting of the CSC
 - Status reporting on, and completion of, any action they are allocated
 - Reporting as per each meeting agenda and as relevant to the area/s they represent

Inclusion of children, parents and other stakeholders, such as Critical Friends⁶:

It is important that the work of the CSC is not impeded by concerns of perceived or actual confidentiality issues and other operational risks. This impediment can occur despite best intentions and organisational culture, and confidentiality at times may be important to ensure fulsome information sharing and consideration. For this reason, children, families and other stakeholders will not be included in the CSC membership.

However, the input of children, parents and other stakeholders is integral to enable meaningful engagement with these persons, in keeping with Standards 2 to 4. To support engagement, each **Child Safe Action Plan** will include strategies for effective participation of children, parents and other relevant stakeholders.

PUBLIC COMMITMENT TO CHILD SAFETY⁷

The **Child Safe Anglican Education Policy** includes a Public Commitment to Child Safety. Each **Child Safe Action Plan** is to describe how this Commitment is embedded within operations.

PUBLICATION OF DOCUMENTS

The **Child Safe Anglican Education Policy** and associated procedures will be published by the ASC on their website.

Each **Child Safe Action Plan** is to describe how these, and other relevant documents are made available to that Child Safe Entity's stakeholders, inclusive of appropriate information for children, families, workers and other community members. At a minimum, this will include publication of the policy, procedures, and their **Child Safe Action Plan: Operations** on their respective websites.

⁵When organisations implement the Child Safe Standards, they must also provide an environment that ensures the cultural safety of Aboriginal children and Torres Strait Islander children. This is known as the Universal Principle. It has the same importance as each of the Standards and the same enforcement powers can be used by the Queensland Family and Child Commission to address non-compliance.

⁶A Critical Friend is a trusted person, usually independent of the School or ECS who can provide specialist advice to inform the work of the Committee, for example, advice regarding cultural safety or online safety. Examples of potential Critical Friends include a local Elder, academic, a private service provider, a graduate from the school, or representative from a local community service provider.

CHILD SAFE ADVOCATES (FORMERLY STUDENT PROTECTION OFFICERS)

Child Safe Advocates are staff who have a vital role in helping a school or ECS meet their responsibilities to provide child safe responses.

EDUCATION AND CARE SERVICES (INCLUSIVE OF CO-LOCATED ECS)

Each Nominated Supervisor must be a Child Safe Advocate. Responsible Persons⁸ can also be Child Safe Advocates on approval of the Approved Provider's delegate.

SCHOOLS (INCLUSIVE OF CO-LOCATED ECS)

Lead Child Safe Advocates:

Recommended to be a member of executive or senior leadership, who may or may not also be the Chair of the Child Safe Committee, this role provides leadership support to the Principal and other Child Safe Advocates⁹ in the administration of both:

- **Procedures: Child Safe Responses**
- **Procedures: Child Safe Operations (internal review requirements)**

Child Safe Advocates:

Schools are to allocate the below responsibilities across their team of Child Safe Advocates as best fits their operational arrangements. See **Practice Resource: Child Safe Delegations: Approval template**.

REQUIREMENTS

Before commencement, Child Safe Advocates must participate in an Induction¹⁰ delivered by the Child Safety Program, ASC.

RESPONSIBILITIES

Child Safe Advocates are responsible for supporting the application of the **Procedures: Child Safe Responses** within school and ECS operations. This includes:

- a) A contact person and support for children when they are concerned for their own, or another child's safety or wellbeing, or are reporting the conduct of any person in an Anglican school or ECS that the child considers as inappropriate conduct, abuse or neglect¹¹.
- b) A contact person and support for families, workers, visitors and community members relevant to concerns for a child's safety or wellbeing, or the conduct of any person in an Anglican school or ECS that may be considered inappropriate conduct, child abuse or neglect.
- c) Facilitate the gathering of information that will assist in the response to concerns, such as assessing whether the matter meets the threshold for applying the procedures, and what that response involves.
- d) Whenever identified as being of assistance, consult with staff of the Child Safety Program, ASC, regarding the application of the procedures in practice.
- e) Assist the Principal (schools), Nominated Supervisors and the Approved Provider (ECS), and the delegate of the governing body (both) in meeting their responsibilities, as outlined in the procedures.

⁷Replaces previous Statement of Commitment

⁸As per the Education and Care Service National Law, a Responsible Person is, in addition to the Approved Provider and a Nominated Supervisor, a person in day to day charge of the service (s162).

⁹Previously referred to as Student Protection Officers.

¹⁰One of the education resources provided by the Child Safety Program, ASC – this replaces a Student Protection Officer Induction.

¹¹It is recommended this responsibility is allocated to all Child Safe Advocates. To comply with regulatory requirements, at least two school staff must have this responsibility.

RISK

CHILD SAFE RISK MANAGEMENT

Risk management, focused on preventing, identifying, eliminating, mitigating risks to children's physical, emotional, psychological and cultural safety and wellbeing, is an integral part of being a child safe organisation.

CHILD SAFE RISK MANAGEMENT

Effective management of risk can support the safety of children and wellbeing, while creating worthwhile opportunities.

Each school or ECS has a positive duty to ensure the safety of children and to protect them from risks arising from the organisation's operations. This includes the need to:

- Identify reasonably foreseeable risks
- Eliminate these risks so far as reasonably practicable, and
- Where they cannot be eliminated, minimise risks as far as reasonably practicable through the implementation, maintenance and review of effective risk control measures.

Risk management is a proactive process that enables a school or ECS to identify risks and reduce the likelihood or severity of adverse circumstances.

At a high level, the three risks seeking to be managed are:

- Children will be harmed or placed at risk of harm from abuse (physical, sexual, emotional, psychological) or neglect (lack of appropriate care) by an adult, or from the conduct of other children.
- Children's need for physical, emotional, psychological and cultural safety will not be met.
- Concerns of child harm will not be effectively responded to.

As such, each school and ECS are required to reflect the management of these risks within their risk management processes, which are broader, yet inclusive of child safety.

To assist, the Compliance Support Index has content focused on applying a risk management approach to each Child Safe Standard¹².

Children are often exposed to a variety of environments, activities and people related to their enrolment at a school or ECS. Schools and ECS are responsible for assessing these circumstances to identify risks and plan accordingly. As part of each school and ECS risk management process, **all activities undertaken by or within the School or ECS require a risk assessment.**

Key questions to consider when assessing risk for all contexts:

- Does this create any potential risk to the safety of children? Consider the environment, activities and people children could reasonably be foreseen to be exposed to.
- Are there effective controls in place to adequately reduce these risks?
- Do the people who need to implement these controls understand their responsibilities, and have the capability to do so?
- Have staff with appropriate authority approved these arrangements, with specialist advice sought where needed?
- Are risk assessments and plans (including controls) recorded in a way that enables the school or ECS to evidence that all action that could be reasonably expected has been taken to protect children from harm?
- Are effective quality assurance strategies in place to be confident this is happening?

COMMON HIGH-RISK ACTIVITIES

In addition to the above, see Appendix A for content to inform relevant risk assessments and operations of the following activities:

- Procurement of a Business, or Hiring out use of School or ECS Facilities
- International Students, including Home Stay
- Boarding, Billeting and other Overnight Accommodation (including camps)

¹²Advice on risks and examples of controls are located the end of each Standard (noting the combining of this content for Standards 9 and 10).

CHILD SAFE HUMAN RESOURCE MANAGEMENT

This section applies to all “workers,” an inclusive term for any individual performing work of any kind within or on behalf of an Anglican school or ECS, including as example, staff, volunteers, and contractors.

CHILD SAFE HUMAN RESOURCE MANAGEMENT

PEOPLE MANAGEMENT

This section applies to all “workers,” an inclusive term for any individual performing work of any kind within or on behalf of an Anglican school or ECS, including as example, staff, volunteers, and contractors. This definition is consistent with the *Child Safe Organisations Act 2024*.

Required role documentation: Each school or ECS must develop and maintain a role description or similar document for every role type. This document must include:

- Role requirements: Relevant information and requirements (e.g. screening, registration, qualifications).
- Responsibilities to children: A clear outline of the role’s duties and responsibilities related to child safety.
- Management oversight: Details of the position(s) responsible for the management and oversight of the role.

Active management of all workers: Every role, whether paid or unpaid, must be actively managed. This management is to be delegated to an appropriate line manager who is responsible for the oversight of the role, for example, recruitment, induction, training and performance management.

Managing other individuals: For individuals not directly engaged as workers (e.g. external service providers, residents on school grounds, visitors) alternative risk management assessments and controls must be in place. Entry points without robust assurance processes are considered high risk due to reduced oversight. See: Child Safe Risk Management.

RECRUITMENT AND SCREENING

Child-safe recruitment, including advertising, referee checks, and screening, is central to ensuring the safety and wellbeing of children. When recruiting, consider the following:

- **Assess values and attitudes:** Use recruitment and selection processes to evaluate whether an applicant’s values, motives, and attitudes align with a culture that sees children’s safety as paramount. This includes assessing their understanding of the importance of listening to children and the shared responsibility of adults for child safety.
- **Evaluate professionalism:** Reinforce and evaluate the applicant’s understanding of professional boundaries, as this is essential for protecting children.
- **Conduct thorough reviews:** Be thorough and critical when reviewing all application information. Be vigilant for ‘red flags’ such as boundary issues or a history of rule-breaking, that may impact a child’s safety or wellbeing.

Vacancy Management

Advertisements and role descriptions: Include clear statements about the school or ECS commitment to children’s physical, emotional, psychological and cultural safety and wellbeing in all job advertisements. Role descriptions should also reflect this commitment and outline relevant child safety expectations specific to the position.

Code of Conduct: Provide all applicants with applicable conduct expectations (e.g. Code of Conduct) as part of the information package. Require applicants to read and confirm their agreement to these expectations in writing, with this confirmation documented as part of the application process.

Selection Criteria: Include a selection criterion such as: “must be able to demonstrate an understanding of appropriate professional boundaries and standards when working with children and young people.”

¹²Advice on risks and examples of controls are located the end of each Standard (noting the combining of this content for Standards 9 and 10).

Conduct Expectations

During the assessment of a person's suitability for a role, explore their understanding and commitment to conduct expectations, especially regarding interactions with or about children. Apply the following areas as relevant:

- **Motivation:** The applicant's motivation for working in a school or ECS.
- **Child development:** Their understanding of children's development and needs.
- **Values and attitudes:** Their values and attitudes towards children, including their perspective on children's rights and how to uphold them.
- **Professional boundaries:** Their understanding and commitment to maintaining appropriate professional boundaries.
- **Employment history:** Their reasons for leaving current or previous jobs.

Prior to accepting a position, applicants must be asked to disclose if they:

- been charged with an offence against a child (including charges not proceeded with, or where a caution was provided)
- had a prohibited status under applicable "working with children" screening legislation lifted (in Queensland or other jurisdictions), or
- been the subject of any complaint, disciplinary, or investigatory processes involving child abuse or neglect.

If at any time during the recruitment process information is received that any of the above apply, consultation with relevant people (including delegates of the Approved Provider and governing body) must occur.

No applicant may be appointed if doing so would knowingly increase the risk of harm to any child.

Referee checks

When considering an applicant, assess their ability to provide appropriate referee options. The following must be considered:

- **Reference requirements:** References are preferred from positions where the applicant has worked with children, especially within the last five years. Applicants should nominate senior referees who were in a line management position. If such a referee is unavailable, the applicant must provide a reasonable explanation.
- **Minimum checks for high-contact roles:** For workers in roles with significant contact with children (e.g. unsupervised contact, personal care or homestay hosting), conduct a minimum of two personal referee checks. Critically assess the suitability of each nominated referee.
- **Referee identity:** Confirm the identity of each referee to ensure the reliability of the reference check.

Referee checks are a critical part of the suitability assessment. To ensure a consistent process, schools should adopt a standardised set of questions for all referees.

All checks must clearly establish the referee's relationship with the applicant, including how long they have known each other and the specifics of their professional or personal connection.

The check should then seek information about the following:

- **Work with children:** The referee's knowledge of the applicant's work or interactions with children and families, including any specific observations or feedback.
- **Suitability and conduct:** Their opinion on the applicant's suitability for the position, including any concerns about the applicant's attitudes or conduct regarding children's physical, emotional, psychological and cultural safety and wellbeing.
- **Concerns:** Whether they have any concerns about the applicant working with children.

Screening

Note: screening can only detect a subset of unsuitable individuals. They are not confirmation that a person is 'safe'.

The following steps are to be taken:

- **Credential verification:** Prior to appointment, verify the applicant's identity, qualifications, professional registration, and other relevant screening requirements.
- **WWCA compliance:** Ensure that all individuals who require a Working with Children Authority (Blue Card or Exemption Card) have a current authority linked to the school or ECS using Blue Card Services Online Organisational Portal prior to commencing work.
- **Additional checks:** Consider the need for the Anglican Church's National Professional Standards Register, National Police Clearance or international criminal history checks.
- **Do not** engage a person until all relevant screening has been completed, as substantial penalties can apply for non-compliance.

Refer to the **Practice Resource: Advice on Screening Requirements in Schools and ECS** for specific screening requirements by role type.

Online Validation and Linking of WWCA

Before a person who requires a Working with Children Authority commences, the school or ECS must confirm the validity of their Blue Card and link them to the school or ECS Blue Card Services (BCS) Online Organisational Portal.

This applies to all workers, including trainee students and pre-service teachers.

The purpose of linking is to ensure the school or ECS receives direct notification from BCS of any changes to the person's eligibility status.

Identity Verification: Prior to notifying BCS about a person's employment, the school or ECS must take reasonable steps to verify the person's identity and ensure it is consistent with their Blue Card.

Verification of Professional Registrations

For workers who are regulated through a professional body (e.g. the Queensland College of Teachers or the Australian Health Practitioner Regulation Agency), their registration must be confirmed prior to commencement. Where possible, their registration is to be linked to the school or ECS as the employer. Where a link is not possible, their registration must be confirmed on at least an annual basis.

The requirement for workers to maintain a Working with Children Authority (Blue Card) or a professional registration must be clearly stipulated in their employment contract or agreement.

Workers (including volunteers) who do not require a Working with Children Authority:

Workers (including volunteers) in schools or ECS must be eligible to hold a Working with Children Authority (Blue Card), even if they are exempt from requiring one (e.g. some parent volunteers and volunteers under 18).

In these circumstances, the school or ECS must have workers acknowledge in writing that they:

- Do not currently have a suspended Working with Children Authority or hold a Negative Notice.
- Are not a disqualified person as defined in the Working with Children Check Act 2000.
- Are not currently charged with or have been convicted of a serious or disqualifying offence as defined in the Working with Children Check Act 2000.

Probation

Schools/ECS are recommended to apply the maximum allowable probation periods to all positions. This period should be used as a proactive and thorough assessment of the employee's suitability.

During this phase, it is recommended to:

- Use direct observation and feedback: The line manager should use direct observation and feedback from others (including children and relevant stakeholders) to assess the employee's strengths and weaknesses in their work with children.
- Act early: Use the probation period as an opportunity to identify and address issues promptly, preventing them from escalating.

MANAGEMENT OF WORKING WITH CHILDREN AUTHORITIES AND REGISTER

Schools and ECS must have local work instructions/procedures for managing all Working with Children Authority (Blue Card, including Exemption Card) and Register processes.

Accountable Person

The Principal (schools) or the Nominated Supervisor (ECS) must delegate one person to serve as an Accountable Person for overseeing all internal processes related to Working with Children Authorities (Blue Cards, including Exemption Cards) and the associated Register. Consideration should also be given to business continuity should this person be unavailable. See Practice Resource: Child Safe Delegations: Approval template.

With reference to the requirements described below, key responsibilities of this role are to:

- **Document and apply procedures:** Create and apply local work instructions/procedures
- **Manage Blue Cards and Registers:** Fulfill the school or ECS responsibilities regarding Blue Cards and maintain a complete and accurate Register. This includes:
 - Appointing appropriate staff as 'administrators' for the BCS Online Organisational Portal and the school/ECS Register.
 - Maintaining the currency of the Contact Person on the BCS Online Organisational Portal.
- **Oversee Audits:** Ensure that all required audits are undertaken.

Nominated Representative/Contact Person for Blue Card Services (BCS)

Under Queensland law, each school and ECS must have a Nominated Representative with Blue Card Services (BCS). This person is referred to as the Contact Person. The Contact Person is the employing authority (e.g. the school Principal).

Communication with BCS

The Contact Person is the only individual who will receive official correspondence from BCS regarding blue or exemption card applications, including notifications and outcomes. Anyone listed as an 'administrator' on the BCS Online Organisational Portal is a 'telephone contact', a person who can call BCS on behalf of the Contact Person but will not receive written correspondence.

Updating Contact Details

BCS requires the contact details of the Contact Person to be maintained. Updating this information can be done online (via a form or through the BCS Online Organisational Portal) or by submitting a paper form.

Register

All persons engaged as part of school or ECS operations must be recorded on a Register.

Mandatory Register Information

The Register must include, at a minimum, the following details for each person:

- Engagement dates (commencement and cessation).
- Whether a Working with Children Authority (Blue Card, including Exemption Card) is required, and if so, the details of that Blue Card, including the expiry date.
- Where a Blue Card is not required, the reason for this exemption.
- Confirmation that the person is not a Restricted Person.

Record Retention

Once a person is entered onto the Register, their entry must not be deleted, even if their engagement ceases.

Recommended Additional Information

The Register can also be used to record additional information, such as contact details, completion of induction/training, and/or acknowledgment of the Code of Conduct.

Maintaining Blue Cards: Renewals

If a cardholder fails to renew their Blue Card before it expires, they are subject to the "No Card, No Link, No Start" rule and are unable to continue in their role. Furthermore, if a person remains engaged after their Blue Card has expired and no renewal application was made prior to expiry, the school or ECS may be committing an offence.

Renewals process

1. Blue Card Services (BCS)

- Applicants can apply to renew their Blue Card up to 16 weeks before its expiry date.
- Cardholders must keep their personal contact details up to date with BCS. This can be completed online.
- BCS will send cardholders a reminder text to renew their card before it expires.

2. Internal School/ECS Alert System

- The Register must clearly identify the expiry date of each Blue Card.
- The Register and local processes should support an internal alert system that provides a warning at least 12 weeks prior to an expiry date.
- It is preferable that this alert system is automated and notifies both the cardholder and the relevant staff responsible for the Register.
- Local processes must outline the actions taken to ensure the Blue Card is renewed prior to the expiry date.

3. Managing Volunteers Turning 18

- The date of birth of volunteers nearing their 18th birthday (such as residents in a homestay) can be recorded on the Register as an "expiry date" and used to trigger an alert, notifying that a Blue Card is required prior to their birthday.

Leaving an Organisation

When an employee or volunteer leaves the school or ECS, Blue Card Services (BCS) must be notified as soon as practicable. This is done by de-linking the cardholder via the BCS Online Organisational Portal or by submitting a de-link form.

Concurrently, the Working with Children Register must be updated to reflect that:

- The person is no longer with the school or ECS.
- The person is no longer linked with the school or ECS on the BCS portal.
- The person's Blue Card status has been updated to 'inactive'.

This process is critical for meeting legislated privacy obligations.

Change in Police or Disciplinary Information

A person with a Blue Card is not legally obligated to advise their employer of any change to their police information. Instead, all applicants and cardholders are obligated to inform Blue Card Services (BCS) directly of any changes to their police information. This is done by completing a change in police information notification on the BCS website.

When BCS receives information on changes to a person's police history (either from the Queensland police or the individual themselves), BCS will determine if this changes the applicant's eligibility to work with children (e.g., through suspension or cancellation of their Blue Card).

Note: BCS is only notified of changes to Queensland police history. Interstate history is only checked during the initial application and renewal processes.

Regardless of their Blue Card obligations, all workers are required to disclose any information that may indicate a perceived, potential, or actual child safety 'concern' under the **Child Safe Anglican Education Policy**. This includes information about their own conduct that may impact their Blue Card or their status as a non-restricted person.

For guidance on how to respond to such a disclosure, refer to the **Procedures: Child Safe Responses**.

Cancellation, Suspension, or Negative Notice

When a Blue Card is correctly linked to the school or ECS, Blue Card Services (BCS) will notify the school's or ECS's Contact Person of any suspension or cancellation.

Upon receiving such a notification, the school or ECS must:

- 1. Immediately remove the person:** A person with a suspended Blue Card or a Negative Notice cannot continue in regulated employment. The school must immediately remove the person from such a role.
- 2. Prohibit return:** The person must not return to regulated employment until the suspension or negative notice is revoked, and the school or ECS is satisfied that the person does not present an unacceptable risk of harm to children.
- 3. Update the register:** The school or ECS Register must be updated to note the BCS notification and the actions taken to protect children.

Audit

The Accountable Person must facilitate and undertake internal audits at least three times each year to ensure the integrity of the Working with Children Authority and Register processes within the school or ECS. This is aligned with reporting by the Child Safe Committee.

The outcomes of these audits are to be reported as follows:

- **Breach of law:** If a breach of law is identified, it must be reported immediately to the Principal (schools) or the delegate of the Approved Provider (ECS). The Principal or delegate must, in turn, ensure the delegate of the governing body is notified.
- **Regular reporting:** Audit outcomes must be included in the Child Safe Committee Report submitted to the Principal and School Council, or Nominated Supervisor and ECS Management Committee, in Terms 2, 3, and 4.

During each audit, the following key matters must be checked:

- **Register accuracy:** Verify that all relevant information is recorded in the Register and that it matches the Blue Card Services Online Organisational Portal (e.g. that individuals remain linked). Ensure all newly engaged people have been added to the Register since the last audit.
- **Expiry dates:** Confirm that all Blue Card expiry dates are in the future.
- **Proactive alerts:** Identify all alerts for potential non-compliance, such as cards due to expire or a volunteer/homestay adult household member who is due to turn 18.
- **Renewal action:** For any Blue Card with an alert dated before the next scheduled Audit, confirm that appropriate action has been taken or is planned to support the person in applying for their renewal or initial Blue Card.

Schools and ECS are to cross-reference the Register with other localised systems (such as payment, sign-in, and information databases) to ensure all relevant persons are recorded correctly. In addition to staff on payroll, careful consideration must be given to the following groups:

- **Volunteers:** Including the identification of parent volunteers who may require a Blue Card.
- **Support roles** such as sports coaches and music tutors
- **Homestay** hosts and residents
- **Regulated Businesses:** Especially sole operators/contractors engaged by the school or ECS.

Managing Breaches

The delegate of the governing body must be immediately notified of all reported or identified breaches of the Working with Children Checks Act 2000.

This notification is to be made by the Principal (for schools) or the Nominated Supervisor/delegate of the Approved Provider (for an ECS).

Breaches to be reported include, but are not limited to:

- Engaging a person who is required to have a Blue Card but does not.
- Not linking a person who requires a Blue Card prior to their commencement.
- Continuing to engage a person whose Blue Card has expired without a renewal application having been made prior to expiry.
- Engaging a person who is known or reasonably suspected to be a "Restricted Person."

The written notification of a breach must include the following:

- **Root cause analysis:** An analysis of the events that led to the breach.
- **Remedial actions:** A description of the immediate and ongoing actions taken to remedy the matter.
- **Preventative measures:** A plan of action to prevent a similar breach from occurring in the future.

INDUCTION AND TRAINING

The following minimum requirements apply to providing information, training and instruction. Each school/ECS is to be able to evidence the provision of this material to relevant persons.

PERSON	MINIMUM REQUIREMENTS
Visitors, volunteers and staff	<p>Onboarding</p> <p>Be provided with information that outlines their responsibilities relevant to the Child Safe Anglican Education Policy. The nature of this information is to be determined by the School or ECS, and may vary as relevant to the purpose of the person's role and responsibilities. Generally, the onboarding material:</p> <ul style="list-style-type: none"> • is provided prior to the person commencing their intended role. • can occur through either verbal presentation or through written material (including, for example, information provided and agreed to when 'signing in' to the School or Service). Verbal presentations are to be documented (e.g. file note). • occur on at least an annual basis.
Staff and volunteers (in addition to above)	<p>Are equipped, through ongoing education and training as relevant to their role, with the knowledge, skills and awareness to help children have their safety needs met.</p> <p>For volunteers and short term/seasonal and new staff, this information will be made available through onboarding induction. Staff in continuous service also complete annual training (discussed below).</p> <p>Schools and ECS will provide information (including training materials) to support volunteers and staff, to understand matters related to the school or ECS Child Safe Action Plan, and the role they have in helping to manage risks to children's safety.</p> <p>Without limiting what training may be required, training may include:</p> <ul style="list-style-type: none"> • helping to create environments that reduce the opportunity for abuse or harm to occur, and embed strategies aimed at preventing harm and enhancing wellbeing • being attuned to signs of harm and abuse and helping identify risks of harm and abuse to children, including harm and abuse caused by other children • helping facilitate child-friendly ways for children to express their views, participate in decision making and raise their concerns • helping handle disclosures or suspicions of harm and abuse to children • supporting colleagues who disclose or raise concerns of harm or abuse • understanding the existence and application of applicable law and any obligations that they may have under that law, and • effectively implementing the organisation's relevant policies and related processes.
Staff (in continuous service), and members of a School Council, or Education and Care Service Management Committee (in addition to above)	<p>Are trained annually in child safe processes:</p> <ul style="list-style-type: none"> • using training material provided by the ASC each year on child safe processes, and • additional, often localised, content provided by the School or ECS.
Child Safety Advocates, including Nominated Supervisors (in addition to above)	<p>Participate in:</p> <ul style="list-style-type: none"> • an ASC Child Safe Advocate Induction, prior to commencement in the role, and at least every 3 years thereafter. • annual professional development as arranged by the ASC.

Assurance

ASSURANCE AND LEARNING

Additional actions are taken to support assurance and learning outcomes detailed in the Child Safe Anglican Education Policy.

ASSURANCE AND LEARNING

In addition to the processes associated with the Child Safe Action Plan and the internal audits of Working with Children Registers, the following additional actions are taken to support assurance and learning outcomes detailed in the **Child Safe Anglican Education Policy**.

NOTIFICATION OF COMPLIANCE

- By the end of term 1 each year, the person responsible for approving the Child Safe Action Plan (Schools: Principal, ECS: Delegate of the Approved Provider), is required to write to the Chair of the school or ECS governing body, confirming:
 - The Child Safe Action Plan has been approved for that year.
 - That the Child Safe Action Plan: Operations includes actions that reflect that the school or ECS is meeting all mandatory requirements as identified in the Compliance Support Index and has been doing so for the preceding twelve months or when the requirement came into effect, whichever is the later date.
 - If a requirement has not been met, the advice will include what steps have been taken to rectify the issue.

Note: Where the governing body is Diocesan Council, advice will be provided through the Anglican Schools Commission, via the Executive Director.

INTERNAL REVIEW OF CHILD SAFE RESPONSES



Requirements:

- The Lead Child Safe Advocate, or an alternative delegate of the Principal (schools) or Approved Provider (ECS), will undertake review of Child Safe Responses in the circumstances listed below. See **Practice Resource: Child Safe Delegations: Approvals** template.
- Each Appropriate Person¹⁴ who manages a concern and records a Child Safe Response Form (as per the **Procedures: Child Safe Responses**) is responsible for providing this for inclusion in the review process.
- In undertaking the Review, the following will be considered and reported on:
 - The Responses' compliance with the **Child Safe Anglican Education Policy** and **Procedures: Child Safe Responses**
 - Identify
 - urgent matters requiring action (see below)
 - issues or themes through root cause analysis
 - what worked well
 - what were the challenges
 - what could be done differently to improve future responses
 - recommendations for how learnings will be implemented within school or ECS operations, or other actions as relevant

As described below, the form and content of the report may vary depending on type of review.

¹⁴An Appropriate Person, as referenced in the **Procedures: Child Safe Responses**, is a Child Safe Advocate (including Nominated Supervisors), Principals (schools), delegate of the Approved Provider (ECS) and a delegate of the governing body (both schools and ECS).



Context:

Recommendations for change or remedy should be focused on both addressing urgent matters and enabling improvements to future responses.

Internal review of responses related to a school/ECS operations



Requirements:

- A review into each response to **concerns relevant to the operations of the school/ECS** (only) will be commenced within a reasonable timeframe and completed in a timely manner. Where operationally practicable, commencement is aimed to occur within one month of the matter being finalised.
- Where identified during the review, urgent matters are to be reported to the Principal (schools), delegate of the Approved Provider (ECS) and delegate of the governing body (both).
An urgent matter is where the school/ECS response is assessed as not:
 - having taken all reasonable steps to protect a child from harm when in the school/ECS care, control, supervision or authority, or
 - meeting a mandatory requirement (see Compliance Support Index, Standard 6).
- Non-urgent findings and recommendations are to be reported on a biannual basis to the Principal and School Council (schools and co-located ECS), ECS Management Committee (other ECS), delegate of the Approved Provider (all ECS), and the delegate of the governing body. If operationally convenient, this can be integrated into the reporting on the bi-annual review of all concerns (below).

Internal bi-annual review of all concerns



Requirements:

- A review into all concerns managed by the school or ECS will occur and be reported on twice each calendar year, as follows:

Report	Indicative timeframe
1	By the end of May
2	By the end of October, noting matters that are completed after this can carry over to the following year's report 1.

- Any urgent matters are to be reported to the Principal (schools), delegate of the Approved Provider (ECS) and delegate of the governing body (both). An urgent matter is where the school or ECS response is assessed as not meeting a mandatory requirement (see Compliance Support Index).
- The report will include information on the number of concerns raised and the number of matters reported to each statutory authority.
- Non-urgent findings and recommendations are to be reported on a biannual basis to the Principal and School Council (schools and co-located ECS), ECS Management Committee (other ECS), delegate of the Approved Provider (all ECS), and the delegate of the governing body.

GOOD PRACTICE REPORT



Requirements:

1. Each year, aimed to be between March and July, the Director of Child Safety, Anglican Schools Commission, will consider each School and ECS' Child Safe Action Plan for the purpose of providing a **Good Practice Report** identifying areas of good practice or innovation that other Queensland Anglican schools or ECS can consider for their own operations.
2. This Report will be shared with each Principal and delegate of the Approved Provider, along with the Anglican Schools Commission and, where relevant, within the ACSQ.

ASSURANCE AND LEARNING REVIEW



Requirements:

1. A Principal, delegate of the Approved Provider or Chair of the governing body, can trigger a Review, whenever identified as beneficial to improving the effectiveness of a school or ECS operations. Possible triggers, include, but are not limited to, a complaint outcome, critical incident or a regulatory issue.
2. The person who triggers the Review will also approve the scope of the Review, who is to conduct the Review and who the Review Report is intended to be provided to.
3. In undertaking the Review, it is recommended the reviewer focus on the following outcomes, with consideration given to the **Child Safety Anglican Education Policy** and related **Procedures**:
 - a. **Assurance that responsibilities are met:** actions focused on providing assurance that responsibilities to prevent, prepare for and respond to child harm are being met.
 - b. **Improved effectiveness through learning:** actions focused on identifying learning to improve how schools and ECS prevent, prepare for and respond to child harm.
 - c. **Identifying:**
 - i. urgent matters requiring action
 - ii. issues or themes through root cause analysis
 - iii. what worked well
 - iv. what were the challenges
 - v. what could be done differently to improve future operations
 - vi. recommendations for how learnings will be implemented within school/ECS operations, or other actions as relevant.
 - d. Provide a Review Report.

ASSURANCE AND LEARNING AUDIT



Requirements:

1. Commencing 2027, the Executive Director, Anglican Schools Commission, with the support of the Director of Child Safety, will arrange for schools and ECS to participate in an Assurance and Learning Audit.
2. The Director of Child Safety will develop an Audit Methodology for the Executive Director's approval. The approved Methodology is aimed to be shared with respective schools and ECS, at least six months prior to Audit commencement.
3. The Audits will be undertaken by an appropriately qualified person as approved by the Executive Director.
4. Audits will be focused on the following outcomes, with consideration given to the **Child Safety Anglican Education Policy** and related **procedures**:
 - a. **Assurance that responsibilities are met:** actions focused on providing assurance that responsibilities to prevent, prepare for and respond to child harm are being met.
 - b. **Improved effectiveness through learning:** actions focused on identifying learning to improve how schools and ECS prevent, prepare for and respond to child harm.
5. Audit Reports will be provided, by the Executive Director, to the school or ECS governing body, along with, as relevant, the Principal, delegate of the Approved Provider, School Council and ECS Management Committee. Where the governing body is Diocesan Council, this will occur via the Anglican Schools Commission.
6. Audits are intended to occur within five years from commencement of the **Child Safe Anglican Education Policy**.
 - a. For schools, this is aimed to align with the year preceding Cyclical Review through the Non-State Schools Accreditation Board.
 - i. Where this cannot be achieved as the Cyclical Review is scheduled for 2027, transitional planning will occur with the respective school.
 - ii. Audits can be requested to be undertaken earlier by the Principal, School Council or the governing body (inclusive of the Anglican Schools Commission for owned schools).
 - b. For Education and Care Services, this will occur:
 - i. For co-located ECS, aligned with their school's scheduled audit.
 - ii. For all ECS, audits can be requested to be undertaken earlier by the ECS Management Committee, Approved Provider or governing body.

SUPPORT

The ASC provides support to effectively implement the policy and these procedures.

SUPPORT

The ASC provides support to effectively implement the policy and these procedures. For example:

- Child Safety Program with staff available for consultation and support
- The publication of the **Compliance Support Index**
- Provision of **practice and education resources**

PRACTICE RESOURCES

In addition to the policy, procedures and Compliance Support Index, the following practice resources are provided.

Published by the Anglican Schools Commission:

- **Child Safe Action Plan: Operations template**
- **Child Safe Action Plan: Improvements template**
- **Child Safe Action Plan: ASC Support list**
- **Child Safe Action Plan: Monitoring tool**
- **Child Safe Committee: Report template**
- **Child Safe Committee: Terms of Reference guidance**
- **Child Safe Delegations: Approval template**
- **Advice on Screening Requirements in Schools and ECS**
- **Child Safe Delegations template**
- **Practice Resource: Advice on Screening Requirements in Schools and ECS**

External:

- Queensland Family and Child Commission: www.qfcc.qld.gov.au/childsafes
- Blue Card Services: www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card-services

The ASC will also endeavour to publish and update on at least an annual basis:

- a list of products it provides that support schools and ECS to demonstrate compliance with the Standards and Universal Principle
- a list of external resources as reference material for schools and ECS to consider.

APPENDIX A: COMMON HIGH RISK ACTIVITIES

Appendix

APPENDIX A: COMMON HIGH-RISK ACTIVITIES PROCUREMENT OF A BUSINESS, OR HIRING OUT USE OF SCHOOL OR ECS FACILITIES

When a school or ECS engages an external business to provide services to children or allows a business to use its facilities, a risk assessment is to inform the approval process.

These arrangements can create increased risk. While the school or ECS remains responsible for children's safety, its knowledge and control over the activity may be decreased. To mitigate this risk and foster a child safe culture, the school or ECS must be satisfied that the business is assessing and controlling risk effectively.

Actions for Assessing External Businesses

To properly vet and manage external businesses, consider the following.

Ask key questions:

- What is your child safety policy and code of conduct?
- How do you screen and train your staff?
- What are your procedures for handling a child protection concern?
- What is your specific risk assessment for this activity on our premises?

Obtain information and undertake an assessment:

- Documentation: Get copies of the providers relevant documents (e.g. Code of Conduct, child safe policy).
- Risk assessment: Request a written risk assessment, specific to the service or activity they will be providing.
- Proof of compliance: Ask for evidence of any relevant processes, such as their management of Working with Children Authorities (Blue Cards) and relevant insurance.

Seek to be satisfied of the quality of their documentation, asking for additional assurance if needed. It may be appropriate for the school or ECS to actively support the business or contractor to provide a safe service to students, e.g. through using actions detailed in the school or ECS's Child Safe Action Plan or a risk assessment.

Implement controls and maintain oversight:

- Use a formal agreement: Include clauses in a contract, specifying any requirements to adhere to required expectations and outlining indemnity.
- Provide support: It may be appropriate to support the business in meeting school or ECS safety standards by requiring participation in actions described in the school or ECS risk assessment for this activity or the Child Safe Action Plan.
- Monitor the activity: Designate a school or ECS staff member to oversee the initial session and periodically check in.

Key considerations

- a) At the procurement stage, assess the level of risk to children and young people. Ensure that a comprehensive risk assessment is documented and actively implemented.
- b) Determine if the engagement is a contractor relationship. Under the Child Safe Organisations Act 2024, a 'worker' of a Child Safe Entity includes a contractor or subcontractor. If a contractor relationship exists, the school or ECS must manage this person or role similar to a staff member. This applies regardless of payment structure. Examples include a music tutor who invoices the school or an individual provided by a work-hire company. See: Child Safe Human Resource Management.
- c) For any business that is a regulated entity, employs people in regulated employment, or is a Child Safe Entity:
 - Require compliance with the Working with Children Checks Act 2000 and the Child Safe Organisations Act 2024 as a mandatory condition of their engagement.
 - Verify the business operator's Working with Children Authority (Blue Card) before they commence work and, at a minimum, on an annual basis. This verification must be recorded on the school or ECS Working with Children Register.

- For a sole operator, link their WWCA to the school or service to enable real-time monitoring and oversight.

See: Child Safe Human Resource Management

- d)** If a business operator does not require a WWCA, record their details and the reason for the exemption on the school's or ECS's Register.
- e)** Strongly consider seeking a WWCA (Blue Card) for relevant individuals (e.g. guest speakers) where they would require one if the activity was provided in the school or ECS more than 7 days in a calendar year. Base this decision on a factors such as the level of supervision provided and whether the individual commonly provides such services to children.

INTERNATIONAL STUDENTS, INCLUDING HOME STAY

Schools must be able to evidence the actions taken to both prevent and respond to the abuse of children, including compliance with legal obligations. Homestay programs must apply their own comprehensive procedures and processes, that meet all obligations. At minimum, these will include the following topics:

Host recruitment and screening, for example:

- Working with Children Authority (Blue Card) screening and oversight (see: Child Safe Human Resource Management).
- A thorough suitability assessment of all potential homestay hosts.
- An initial physical site visit to verify the accommodation prior to its approval.

Household suitability assessment, for example:

- Be able to evidence the use of thorough and documented processes to assess a host's suitability.
- Assess the suitability of all residents in the homestay facility who are over 18 years old.
- Evaluate any potential risks posed by children residing in the home.

Host training and information, for example:

- Provide comprehensive information and training to all hosts regarding their roles and responsibilities.

Host management and review, for example:

- Implement robust management practices for all hosts, including regular reviews of their ongoing suitability.
- Schools must document and apply rigorous processes for the six-monthly review of each homestay placement.
- As outlined in the National Code, these reviews may utilise various mechanisms. However, they must be formally recorded to verify that a child's accommodation remains appropriate for their age and needs.

Placement matching, for example:

- Use clear and documented practices and processes for matching children with hosts.
- To the extent that is practicable; to support suitable matches, children are to be consulted on potential placements.
- Where applicable, cultural safety must be considered and documented. In these circumstances, it may be appropriate to consult with the child's family or community.

Pre-placement communication, for example:

- Ensure and be able to evidence effective pre-placement communication is provided to the children, setting clear expectations and providing support contacts.

Placement support and verification, for example:

- Provide ongoing support to the child throughout the placement.
- Conduct verifications of the homestay at least every six months.

Student communication, welfare, and care, for example:

- Maintain clear and consistent channels for communication with children.
- Provide ongoing welfare and care management for the child.

To ensure a high standard of safety, schools are to develop, implement, and embed specific quality assurance mechanisms into their management of international students and home stay. The following mechanisms are recommended:

1. Governance and reporting:
 - Establish Key Performance Indicators (KPIs) for relevant matters, e.g. homestay suitability verifications, WWCA audits, and provision of safety information to children.
 - Implement appropriate governance and reporting mechanisms to regularly review these KPIs.
2. Separation of duties:
 - Separate the roles of assessor and decision-maker for host family approvals and verifications. These delegations are to be approved by the Principal.
 - The assessor can make recommendations, but the final approval must be made by a separate, delegated decision-maker.
 - Clearly define and document these roles in their respective position descriptions.
3. Emergency contact management:
 - Establish a strategy for managing emergency contacts available for children in homestay to access (e.g. a dedicated mobile number).
 - This function must be managed by more than one staff member to ensure business continuity, provide appropriate rest time, and prevent over-reliance on a single individual.
4. Demand management and resourcing:
 - Develop a strategy to manage demand and ensure adequate resourcing. This should include identifying:
 - i. An appropriate ratio of hosts to staffing.
 - ii. An appropriate ratio of children (including short-term tours) to staffing.
5. Effective communication:
 - Implement a strategy for effective communication with children and maintain evidence of these communications. This includes:
 - i. Providing culturally and developmentally appropriate information on emergency contacts and how to report abuse.
 - ii. Saving records of written communications used to share legally required information (e.g. orientation PowerPoint slides, emergency contact cards), including version control and dates.

BOARDING, BILLETING AND OTHER OVERNIGHT ACCOMMODATION (INCLUDING CAMPS)

When unrelated children and/or adults share overnight accommodation, the risk to child safety is inherently high. Schools must be able to demonstrate that they are sufficiently satisfied that the designated adult supervisor can provide safe care in all overnight accommodation settings. This requires a rigorous assessment of the supervisors' suitability and the safety of the environment.

All arrangements of this nature must have documented assessments that consider the risks to children and all reasonable actions that are to be taken to mitigate these risks. Without limiting the factors that may be considered, consideration will be given to:

- high risk circumstances such as where the care is being provided:
 - by persons unrelated to the child
 - by any adult in Australian accommodation (including our boarding houses) who has spent substantial periods of time living overseas (due to the limitations of Working with Children Authorities), or
 - in another country.
- the risk of harm due to the conduct of other children.

Risk assessments for overnight accommodation must consider all reasonably foreseeable risks, with the following specifically identified for consideration:

1. Briefing of Responsible Adults

- Ensure that all adults taking responsibility for a child's care (including host parents and any other persons or organisations involved) are briefed appropriately. This briefing should cover:
- Expected Conduct: Clearly define the professional and ethical conduct expected of them while providing care.
- Care and Supervision: Specify the level of care and supervision they are required to provide, including supervision ratios and age-appropriate expectations.
- Child's Behavioural Requirements: Outline the behavioural expectations for the child and the steps to be taken if the child breaches these requirements.
- Emergency Procedures: Detail all emergency protocols, including contact information for the school's emergency personnel.
- Reporting Concerns: Clearly explain the process for reporting any child safety concerns or disclosures to the school.

2. Provide children with explicit instructions that cover the following key areas:

- EStandard of Care: Clearly explain the standard of care they should expect to receive from all adults.
- EBehavioural Expectations: Outline the expected conduct for both themselves and their peers.
- Seeking Help: Inform them of multiple, appropriate, and immediately accessible options for help. They must know who to talk to if they are worried or concerned about something.

3. Working with Children Checks for All Relevant Persons

- Ensure all relevant adults (e.g., all household members in a billeting family) hold a current Queensland Working with Children Authority (Blue Card) or its jurisdictional equivalent.
- If a check is not legally required and cannot be obtained, this must be explicitly communicated to the approver of the activity. The approver must then be satisfied that other strategies in place are sufficient to meet the school's legal obligation to take all reasonable actions to prevent abuse.

4. For homestay and billeting arrangements, it is highly recommended to place children with other children to prevent isolation.
 - Ideally, the child should be placed in a home with children of a similar age.
 - Whenever possible, place children together in groups with children who are known to them, with an ideal number of three or more, to provide a peer support and supervision.
 - Consider the information know about, or able to reasonably be obtained, to inform the risk assessment.
5. Ensure the provision of an appropriate and safe care environment for children. This includes:
 - Sleeping arrangements: Children must have a safe, private, and suitable sleeping space.
 - Private facilities: Children must have appropriate access to private spaces, such as bathrooms and toilets.
6. Before any trip, schools must conduct an assessment of all children proposed to attend, with particular focus on identifying those who may be vulnerable or have heightened needs.
 - A pre-trip assessment must be undertaken to determine if the child's needs can be met and if the trip is sufficiently safe for them. Where practicable, children should be involved in the assessment process.
 - Relevant school staff (e.g., the school psychologist and pastoral care team) must be given the opportunity to help identify children of potential concern.
 - Where necessary, an individualised support plan must be developed for these children.
 - Where applicable, cultural safety considerations must be considered and documented. In these circumstances, it may be appropriate to consult with the child's family or community.
7. Ensure appropriate and documented communication with all relevant stakeholders. This communication must clearly outline safety protocols and expectations for everyone involved, including children, parents/guardians, supervising staff, and any host families or organisations.

A risk assessment and plan are mandatory for all individuals residing in school campus accommodation. At a minimum, this plan must include the following conditions:

- Working with Children Authority (Blue Cards): Wherever possible, all adult household members must have a Blue Card linked to the school before the living arrangement begins.
- Alternative Screening: If an adult is not legally required and cannot obtain a Blue Card (e.g. they are not in regulated employment or volunteering), they must, prior to commencement:
 - Provide a current National Police Clearance and agree to renew it at least annually.
 - Confirm in writing that they are not a restricted person under the Working with Children Check Act 2000.
 - Agree in writing to inform the Principal of any changes to their police information, including new cautions or charges.
- Principal's Discretion: Any decision to ask a person to immediately cease residing on the school grounds is to be at the Principal's discretion.

