TOOWOOMBA
GRAMMAR SCHOOL

Student Safety and Wellbeing Policy

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Introduction

Toowoomba Grammar School (the **"School"**) is committed to the protection of our students. If you have any questions or concerns regarding child safe standards at our School, please contact the Headmaster via email head@twgs.qld.edu.au or telephone (07) 4687 2525.

Purpose

The purpose of this policy is to establish and promote a safe, inclusive and culturally responsive environment for all students, ensuring their safety and wellbeing are prioritised in every aspect of the School's operations. This policy provides written processes about how the School will implement and comply with the Child Safe Standards and Universal Principle as required under the *Child Safe Organisation Act 2024 QLD*.

Scope of Policy

This Policy applies to all students (regardless of age), parents, guardians and staff (including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements at the School) ("**Staff"**) and members of the Board of Trustees of Toowoomba Grammar School (the **"Board"**).

Definitions

Child, as per s8 of the *Child Protection Act* 1999, is an individual under 18 years.

Child safe entity, as per s10 of the *Child Safe Organisation Act 2024 QLD,* is an entity—

(a) that provides—
  (i) services specifically for children; or
  (ii) facilities specifically for use by children who are under the supervision of the entity; and
(b) that is either—
  (i) mentioned in schedule 1; or
  (ii) prescribed by regulation.

(2) However, an individual is not a child safe entity unless the individual carries on a business as an entity mentioned in subsection (1), including, for example, as a sole trader or partner in a partnership under the *Partnership Act 1891, section 5*.[1]

Child safe standards, as per s9 of the *Child Safe Organisation Act 2024 QLD,* are the following standards applying to an entity—

(a) child safety and wellbeing is embedded in the entity's organisational leadership, governance and culture;
(b) children are informed about their rights, participate in decisions affecting them and are taken seriously;
(c) families and communities are informed and involved in promoting child safety and wellbeing;
(d) equity is upheld and diverse needs respected in policy and practice;

[1] *Child Safe Organisation Act 2024 QLD s10*

(e) people working with children are suitable and supported to reflect child safety and wellbeing values in practice;
(f) processes to respond to complaints and concerns are child-focused;
(g) staff and volunteers of the entity are equipped with the knowledge, skills and awareness to keep children safe through ongoing education and training;
(h) physical and online environments promote safety and wellbeing and minimise the opportunity for children to be harmed;
(i) implementation of the child safe standards is regularly reviewed and improved;
(j) policies and procedures document how the entity is safe for children.[2]

Student, is any child or young person of any age, enrolled or seeking enrolment at Toowoomba Grammar School.

Universal Principle, in implementing and complying with the Child Safe Standards, a child safe entity must provide an environment that promotes and upholds the right to cultural safety of children who are Aboriginal persons or Torres Strait Islander persons (the Universal Principle).[3]

QFFC, Queensland Family and Child Commission

Objectives

Toowoomba Grammar School will implement and comply with the Child Safe Standards and understand they may be required to give an authorised officer of the Queensland Family and Child Commission (QFCC) information about the School's compliance. In implementing and complying with the Child Safe Standards, The School will provide an environment that promotes and upholds the right to cultural safety of students who are Aboriginal persons or Torres Strait Islander persons (the Universal Principle). The School will have regard to Guidelines made by the QFCC in implementing and complying with the Child Safe Standards and Universal Principle[4].

As per the Guidelines, this policy outlines the ways in which Toowoomba Grammar School actions and prioritises the safety and wellbeing of students. Rules and expectations regarding student safe practices are outlined for staff, volunteers and community members with the aim of establishing a student safe environment[5].

This policy will:

- Set out the School's expectations, practices and approaches in relation to each of the Child Safe Standards, including the Universal Principle
- Be displayed for public access on the School's website and at the School's office
- Cover acceptable and unacceptable student to student, and student to adult interactions
- Describe the School's commitment to equity, inclusion and cultural safety and how the organisation recognises, responds and respects these factors.

[2] *Child Safe Organisation Act 2024 QLD s9*
[3] *Child Safe Organisation Act 2024 QLD s11(2)*
[4] *Child Safe Organisation Act 2024 QLD s11*
[5] *Guidelines for implementing the Universal Principle and Child Safe Standards in Queensland, QFCC, p94*

Principles

The implementation of, and compliance with, the Child Safe Standards and Universal Principle by Toowoomba Grammar School are to be based on the following fundamental principles:

(a) Child safe entities, including Toowoomba Grammar School, are responsible for continuously improving the ways in which, in their operations—
  (i) the safety of children is promoted; and
  (ii) child abuse is prevented; and
  (iii) allegations of child abuse are properly responded to;[6]

(b) The Child Safe Standards are not a simple checklist. They encourage child safe entities to think about how their day-to-day work protects children's rights and safety.[7]

Responsibilities

Toowoomba Grammar School is responsible for developing and implementing this Student Safety and Wellbeing Policy and related policies and procedures to ensure it fulfils its CSS and Universal Principle obligations.

All Board of Trustees members, staff and volunteers at the School are responsible for acting in compliance with this policy and related policies and procedures.

Implementation of the Child Safe Standards

1. Leadership and Culture

Student safety and wellbeing is embedded in Toowoomba Grammar Schools' leadership, governance and culture.[8]

Statement of Commitment

Toowoomba Grammar School is committed to the safety and wellbeing of all students. We recognise that safeguarding children and young people is a fundamental responsibility and central to our mission, values and daily practice. In accordance with the *Child Safe Organisations Act 2024* (Qld), the Child Safe Standards and the Universal Principle, our School prioritises the welfare and best interests of every child in all decision-making and operations.

To further support the safety, wellbeing and best interests of children Toowoomba Grammar School is committed to:

- Implementing and embedding the Child Safe Standards across all aspects of school life, including policies, procedures and practices.
- Upholding the right to a culturally safe environment for Aboriginal and Torres Strait Islander students, and for students from diverse backgrounds, in accordance with the Universal Principle.

[6] *Child Safe Organisation Act 2024 QLD s14*
[7] *Guidelines for implementing the Universal Principle and Child Safe Standards in Queensland, QFCC, p4*
[8] *Child Safe Organisations Act 2024 QLD, s9(a)*

- Consulting with staff, volunteers, parents, students and the broader School community to ensure our commitment is meaningful, understood, child-centred and culturally responsive.
- Aligning our statement with the School's vision, mission and values, reinforcing its importance throughout our community.
- Providing age-appropriate versions of this statement so that all students understand our commitment to their safety and wellbeing.
- Making this statement publicly accessible on our website and in key policies and documents.

Risk Management

Toowoomba Grammar School implements robust risk management processes to prevent, identify and mitigate risks to students, and is committed to the monitoring of risk to the safety of students on an ongoing basis. Toowoomba Grammar School will utilise various risk management tools including the School's

- Risk Management Policy & Framework
- Risk Management Processes
- Risk Appetite Statements
- Risk Registers
- Work Health & Safety Policy
- Critical Incident Policy

and associated plans to assist it in this process and will keep appropriate records of decisions made and actions taken in relation to risks to students.

Code of Conduct

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

At Toowoomba Grammar School we expect our staff and volunteers to conduct themselves as follows:

- School staff and volunteers are expected to always behave in ways that promote the safety and wellbeing of our students. Staff must actively seek to prevent harm to students, and to support those who have been harmed.

Specific responsibilities include:

- Staff and volunteers 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, staff and volunteers must exercise caution to ensure that the contact is appropriate and acceptable. Staff must always advise the student of what they intend on doing and seek their consent.
- Staff must not develop a relationship with any student that is, or that can be interpreted as being of a personal rather than a professional nature.
- Staff and volunteers must not have a romantic or sexual relationship with a student.
- Staff and volunteers must treat all students, colleagues and community members with respect, fairness and dignity, regardless of culture, race, ethnicity, language, religion, ability, gender, sexual orientation, or background.
- Staff and volunteers must not engage in any form of racism, discrimination, harassment, or exclusionary behaviour. This includes verbal, written, online or behavioural actions that demean, stereotype or disadvantage an individual or group.

- Staff and volunteers must actively challenge racist or discriminatory behaviour when it occurs and follow school procedures for reporting such incidents.
- Staff and volunteers must promote a culturally safe, inclusive and respectful environment by valuing diversity, acknowledging cultural differences, and modelling culturally responsive behaviour at all times.

Information Sharing and Recordkeeping

Staff and volunteers understand their obligations in information-sharing and maintaining accurate, secure records about student harm and abuse concerns, disclosures, and responses.

2. Student Voice

Students are informed about their rights, participate in decisions affecting them and are taken seriously.[9]

Toowoomba Grammar School is committed to championing the voices of children and young people, ensuring they have genuine agency in matters that affect them. We listen to students in age-appropriate and culturally appropriate ways and create safe, structured opportunities for them to express their views.

Toowoomba Grammar School uses the curriculum and educational programs to actively promote positive peer relationships and reduce student isolation by embedding learning experiences that strengthen social skills, empathy and respectful behaviours. Through age-appropriate lessons and whole-school wellbeing programs, students are also provided with access to sexual abuse prevention education that builds their understanding of personal safety, protective behaviours and where to seek help. Together, these curriculum-based approaches support safer, more connected and more informed students.

Toowoomba Grammar School ensures that all staff and volunteers are appropriately trained in indicators of harm and abuse and are equipped to recognise when a student may need support. Age-appropriate and trauma-informed processes are in place to help students communicate their concerns safely and confidently, and staff actively respond to these disclosures with care and professionalism in accordance with Toowoomba Grammar School's Reporting Concerns of Harm and Abuse Policy.

3. Family and Community

Families and the community are informed and involved in promoting student safety and wellbeing.[10] Toowoomba Grammar School recognises the vital role families and communities play in the safety, wellbeing, and education of students. We value strong, respectful, and collaborative partnerships with families and the broader School community.

We intentionally build inclusive relationships, particularly with First Nations families, local community members, and Elders. We honour Country and embed an Acknowledgement of Country in our practices to ensure students understand the importance of knowing and respecting the land on which we learn.

[9] *Child Safe Organisations Act 2024 QLD, s9(b)*
[10] *Child Safe Organisations Act 2024 QLD, s9(c)*

Toowoomba Grammar School provides the following opportunities for parents and carers to contribute to the School community:

- Parents and Friends Association, Parent Support Groups and surveys.
- Parents, carers and the School community are provided with opportunities to contribute to the development and review of relevant policies, procedures and decision-making.
- Regular communication through the School newsletters, information sessions and parent portal, ensures parents, carers and the School community are informed about the School's operations and governance.

Toowoomba Grammar School is dedicated to the work of reconciliation and actions this commitment through its Reconciliation Action Plan (RAP).

4. Equity and Diversity

Equity is upheld, and the diverse needs of students are respected in policy and in practice.[11]

Toowoomba Grammar School is committed to creating an inclusive, equitable environment where all students feel safe, respected, and supported. We actively work to remove barriers to participation and ensure our practices reflect cultural safety for all students.

This commitment is actioned through the following:

- Inclusive Education Policy for Students with a Disability
- Anti-Discrimination Policy
- Codes of Conduct
- Student Behaviour Management Policy and Procedures

5. People

Toowoomba Grammar School is committed to recruiting, selecting, training and managing staff in such a way that limits risks to students.

In particular, Toowoomba Grammar School will:

- Ensure that its recruitment and selection procedures act to reduce the risk of harm to student from staff 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

[11] *Child Safe Organisations Act 2024 QLD, s9(d)*

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 students.
    - 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 staff 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 staff via:
    - Management processes that are consistent, fair and supportive.
    - Performance management processes to help staff 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 staff 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 student.
    - Keeping a record of the training provided to staff.
    - 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.

6. Complaints

Processes to respond to complaints and concerns are child focused.[12]

Toowoomba Grammar School is committed to maintaining a student-focused approach to receiving and responding to complaints. Our Complaints Handling Policy and Procedure outlines how concerns can be raised, the roles and responsibilities of staff, and the processes used to respond to different types of matters.

We ensure that all complaints are taken seriously, addressed promptly and thoroughly, and managed in line with our reporting, privacy and employment law obligations.

Any concerns, disclosures or allegations relating to harm or abuse of a student are managed under the School's Reporting Concerns of Harm or Abuse Policy, which sets out our mandatory obligations to act protectively and report to the appropriate authorities.

[12] *Child Safe Organisations Act 2024 QLD, s9(f)*

7. Skills and Knowledge

Staff and volunteers of the School are equipped with the knowledge, skills and awareness to keep students safe through ongoing education and training.[13]

The School will train its staff in processes relating to the health, safety and conduct of staff and students on their induction and will refresh training annually.[14]

Toowoomba Grammar School will:

- Provide all staff with induction training in cultural competency and cultural responsiveness, with annual refresher training to maintain and deepen these capabilities.
- Ensure all staff receive induction training in trauma-informed practice, supported by annual refresher training to embed consistent, evidence-based approaches across the School.
- Develop and implement a communications strategy that identifies key stakeholders and delivers regular, relevant information on the prevention of student harm and abuse, as well as best practice in Student Safety and Wellbeing.

8. Physical and Online Environments

Physical and online environments promote safety and wellbeing and minimise the opportunity for students to be harmed.[15]

Toowoomba Grammar School proactively identifies and mitigates risks within both the physical and online environments, ensuring that safety measures do not compromise students' privacy or healthy development. Staff and students use online platforms in line with the School's code of conduct and related policies, supporting a safe, respectful and well-managed digital learning environment.

For further details about how Toowoomba Grammar School manages risk see 1. Leadership and Governance above.

9. Continuous Improvement

Implementation of the child safe standards is regularly reviewed and improved.[16]

Toowoomba Grammar School is committed to fostering a culture of continuous improvement in student safety, wellbeing and cultural respect. We recognise that embedding the Child Safe Standards and Universal Principle is a continuing journey that requires ongoing commitment, regular review and continual strengthening of our practices.

[13] *Child Safe Organisations Act 2024 QLD, s9(g)*
[14] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(c)*
[15] *Child Safe Organisations Act 2024 QLD, s9(h)*
[16] *Child Safe Organisations Act 2024 QLD, s9(i)*

Toowoomba Grammar School will:

- Review policies, procedures and practices regularly to ensure they remain effective, responsive and appropriate for the Toowoomba Grammar School community. This includes undertaking periodic audits, self-assessments and reflective practice to identify strengths and opportunities for improvement.
- Analyse available data including complaints and concerns to identify causes and systemic issues and use these insights to inform continuous improvement of policies, procedures and practices.
- Conduct an annual self-assessment against the Child Safe Standards using the QFCC self-assessment tool or equivalent (ISQ Checklist for implementing and complying with the Child Safe Standards, ISQ Readiness Survey or other).
- Develop and implement an improvement plan that has regard for the QFCC Guidelines.
- Measure and monitor outcomes by tracking meaningful indicators such as feedback from staff, students and families, incident reports, harm and abuse reports, training participation, and perceptions of cultural safety to understand current performance and areas requiring enhancement.
- Record, monitor and report to the School's Board of Trustees and the Senior Executive Team regarding any breaches of this policy or related policies.
- Engage the School community in continuous improvement by seeking and listening to feedback, encouraging open dialogue, and partnering with students, families, staff, volunteers and community stakeholders to inform updates to policies and practices.
- Provide ongoing learning, training and development for staff and volunteers, including induction and refreshers, to ensure everyone understands their responsibilities for student safety and cultural safety and is equipped to respond effectively as new risks or needs arise.

10. Policies and Procedures

Policies and procedures document how the School is safe for children.[17]

Toowoomba Grammar School has embedded its Statement of Commitment to Student Safety and Wellbeing in all relevant policies and procedures. Toowoomba Grammar School has made all relevant policies and procedures publicly available on its website, school intranet, parent portal and copies are available on request from the School office. Staff and volunteers are trained in implementing relevant policies and procedures regularly.

Toowoomba Grammar School ensures that its policies and procedures are accessible, developmentally appropriate and easily understood by all students. Toowoomba Grammar School provides student-friendly versions of key policies using clear language, visual supports and formats that reflect the diverse communication needs of our students. These include simplified guides, posters, visual flow charts, infographics and digital tools such as apps or interactive resources.

[17] *Child Safe Organisations Act 2024 QLD, s9(j)*

Toowoomba Grammar School regularly reviews these materials with student input to ensure they remain relevant, inclusive and effective in supporting students to understand their rights, know how to seek help, and participate confidently in matters affecting their safety and wellbeing.

Toowoomba Grammar School is committed to ensuring its policies and procedures uphold cultural safety for Aboriginal and Torres Strait Islander students, families and communities. Where possible, the School will actively engage local Aboriginal and Torres Strait Islander Elders, community representatives and cultural advisors in the review, development and implementation of relevant policies and procedures.

Toowoomba Grammar School will embed trauma-aware and trauma-informed practice across all relevant policies, procedures and guidance documents. This includes recognising the impact of trauma on students, understanding how trauma may influence behaviour and communication, and ensuring that staff are equipped to respond with sensitivity and consistency.

Related Toowoomba Grammar School Policies

- Toowoomba Grammar School Acceptable Use of Technology Policy
- Toowoomba Grammar School Complaints Handling Policy*
- Toowoomba Grammar School Complaints Handling Procedures
- Toowoomba Grammar School Admissions Policy
- Toowoomba Grammar School Parent & Guardian Code of Conduct
- Toowoomba Grammar School Performance Management Policy
- Toowoomba Grammar School Reporting Concerns of Harm and Abuse Policy*
- Toowoomba Grammar School Risk Management Framework
- Toowoomba Grammar School Code of Conduct (Staff and Volunteers)
- Toowoomba Grammar School Statement of Commitment to Student Safety and Wellbeing*
- Toowoomba Grammar School Student Behaviour Management Policy*

*Publicly available on the School website.

References and Resources

- Child Safe Organisations | Queensland Family and Child Commission
- Keeping Kids Safe Resources for Teachers, Parents & Carers
- Speak up — For children and young people | National Office for Child Safety

Review

Toowoomba Grammar School will review policies, procedures and practices regularly to ensure they remain effective, responsive and appropriate for the community. This includes undertaking periodic audits, self-assessments and reflective practice to identify strengths and opportunities for improvement.

This policy and supporting documents will be reviewed every year by the Deputy Headmaster or earlier if:

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

Document Tracking

Document Name	Student Safety and Wellbeing Policy
Prepared by	J. Anderson (Dep Headmaster)
Reviewed by	J. Kinniburgh (Headmaster)
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