

PMSA Child Protection Risk Management Strategy - 2012



A strategy for managing risks to children and young people at PMSA schools



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PURPOSE

The purpose of this document is to provide written processes for the risk management of the appropriate conduct of PMSA employees and students that comply with the legislative requirements specified in the *Commission for Children and Young People and Child Guardian Act 2000*, and the *Commission for Children and Young People and Child Guardian Regulation 2001* and the *Commission for Children and Young People Amendment Regulation (No. 1) 2006*, for the protection of children and young people from harm and the risk of harm.

SCOPE

This Child Protection Risk Management Strategy applies to all staff, including volunteers, and other operators associated with the PMSA. The Strategy identifies the policies and procedures in place across the PMSA and its schools which, together, act to protect students from harm. It also identifies strategies in place for recruiting, selecting, training and managing employees; policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines; risk identification and management; communication and support about matters relating to child protection and processes for managing breaches of the PMSA Child Protection Policy.

LEGISLATION

Relevant Legislation

Commission for Children and Young People and Child Guardian Act 2000 (Qld)
Commission for Children and Young People and Child Guardian Regulation 2001 (Qld)
Education (General Provisions Act) 2006 (Qld)
Education (General Provisions) Regulation 2006 (Qld)
Education (Accreditation of Non-State Schools) Act 2001 (Qld)
Education (Accreditation of Non-State Schools) Regulation 2001(Qld)
Education (Queensland College of Teachers) Act, 2005 (Qld)
Education Services for Overseas Students (ESOS) Act 2000 (Cth)
Education (Overseas Students) Act 1996 (Qld)
Public Health Act 2005 (Qld)

POLICIES AND PROCEDURES

The safety and well-being of children and young people in PMSA schools is of paramount importance. The PMSA and its schools are committed to providing safe environments for all children in their care by developing and implementing policies and procedures which ensure:

- All employees (including volunteers) are screened and trained in the requirements and processes of Child Protection and professional behaviour
- Students and parents/guardians are also provided with information and education in the area of Child Protection



PMSA Child Protection Policy

The *PMSA Child Protection Policy* outlines the commitment of the PMSA and its schools to the welfare and well-being of the students of all its schools. The Policy covers information for handling disclosures or suspicions of harm, including the reporting of physical, emotional and sexual abuse, as well as neglect, inappropriate behaviour, bullying and harassment and self-harm. The Policy also covers information on the protection of overseas, homestay students.

The PMSA Child Protection Policy applies to all PMSA staff and students and is available:

- on the PMSA website;
- on the website of each school;
- in the Staff Policy Handbook of each school;
- at reception of each school
- student handbooks (summarised version)

PMSA Abuse Policy

The *PMSA Abuse Policy* provides a basis on which the PMSA can take action to prevent Abuse occurring and respond to any allegations that Abuse has occurred. In particular, the *PMSA Abuse Policy* contains provisions for dealing with the more severe forms of sexual harassment, whereas the less severe forms fall within the provisions of the PMSA Anti-Discrimination Policy.

PMSA Human Resources Policy Manual

Child Protection has been incorporated into the PMSA's broader human resource management framework as detailed in the *PMSA Human Resources Policy Manual*. The Child Protection section of the manual, *Section 5.2*, establishes clear professional standards of conduct to be followed by all employees in the area of child protection and provides obligations regarding employee interactions with students that promote the protection of those students from any threat or risk of harm.

The PMSA Human Resources Policy Manual is available:

- on the PMSA Staff Portal
- on individual school intranets

PMSA Homestay Risk Management Policy

The *PMSA Homestay Risk Management Policy* provides written processes to ensure that Homestay Service Providers and Homestay Hosts for PMSA schools comply with legislation applying in Queensland about the care and protection of children in homestay arrangements.

PMSA Blue Card (Working with Children) Policy

All employees, volunteers, including Councillors, homestay parents and other people in contact with students of PMSA schools must have a current blue card where required by legislation.

The *PMSA Blue Card (Working with Children) Policy* requires that all persons who are engaged in, or provide services to, student children in PMSA schools, except those volunteers who fall into the



exempted categories, must be holders of positive notices, known as “Blue Cards’, issued by the Commission for Children and Young People and Child Guardian before commencing provision of services.

To ensure compliance with legislation and PMSA Policy, each PMSA school is required to maintain a register (Blue Card Register) of:

- all teacher registration numbers and expiry dates
- all blue card numbers and the expiry dates.

The PMSA Human Services Risk Manager conducts audits, at least annually, of the Blue Card Registers in each school.

PMSA’s School’s Accreditation Manual

The PMSA’s School’s Accreditation Manual provides all PMSA schools with strategies to meet the accreditation requirements of *The Education (Accreditation of Non-State Schools) Act 2001*. The Act requires PMSA schools, as established non-government schools, to demonstrate compliance once every five (5) years with key accreditation criteria. PMSA schools must provide evidence of written processes about the appropriate conduct of staff and students, that accord with legislation applying in the State about the care and protection of children, including processes for:

- the reporting by a student to a stated staff member of behaviour of another staff member that the student considers is inappropriate; **and**
- how the information reported to that stated staff member must be dealt with by that stated staff member

ICT Policy

Cybersafety is a serious risk management issue for the PMSA and its schools in relation to child protection. Each PMSA school has policies relating to the appropriate use of information technology within the school which outlines the protocols and procedures for the use of the school’s electronic devices, including internet access, email protocols, electronic record access, security information and confidentiality requirements.

The PMSA Human Resources Manual - Section 5.3, also provides an internet and email usage policy for employees which provides guidance on the proper use of internet and email systems within the PMSA and its schools and makes employees aware of what the PMSA deems as acceptable and unacceptable use of these systems.

Section 5.2 of the *PMSA Human Resources Policy Manual* requires that all employees keep an appropriate professional distance from all students. This includes the appropriate use of the School’s email, intranet and internet systems with students for professional and approved personal communication only, including prohibiting PMSA employees from joining the social networking sites of students and from allowing students to join their own personal social networking sites.



RECRUITMENT AND SELECTION

The PMSA and its schools recognise that risk management in relation to child protection begins with the recruiting, screening and selection of the right people to work in its schools.

Compliance with PMSA Policies on child protection, prescribed notices (Blue Cards) and the prevention and reporting of abuse is a condition of employment with the PMSA and its schools.

It is the policy of the PMSA and its schools that all employees, volunteers and contractors are cleared to work with children such that:

- all members of academic staff are registered or provisionally registered with the Queensland College of Teachers (formerly the Board of Teacher Registration), or have received special dispensation from the College;
- all non-teaching members of staff, Councillors, volunteers and contractors, who are required to hold a blue card, have a current card. The *PMSA Blue Card (Working with Children) Policy* provides details of when a blue card is required.

The policy and guidelines for the recruitment and selection of staff are available in the *PMSA Human Resources Policy Manual –Recruitment and Selection*.

INDUCTION

Each PMSA school has a written induction process for all staff during the first twelve months of appointment. This process includes training and education in Child Protection to ensure all staff are familiar with relevant legislation and policy obligations, in accordance with requirements outlined by the *Commission for Children and Young People and Child Guardian Act 2000* and the PMSA Child Protection Policy, and fully understand their role in respect of child protection including the responsibilities and procedures for handling and reporting disclosures or suspicions of harm.

The new staff induction process includes, but is not limited to:

- staff undertaking mandatory on-line Child Protection training
- drawing the attention of staff to the PMSA Child Protection Policy, PMSA Abuse Policy and this Child Protection Risk Management Strategy
- making staff aware of the protocols for the protection of children in PMSA schools
- working through policies related to child protection

Each PMSA school also has a written induction process for volunteers and contractors which covers education on child protection policies and procedures in PMSA schools.

A copy of “The Ten Commandments for Child Protection at PMSA Schools” is also included in the information provided to all new staff at the PMSA New Staff Induction Day, held in January of each year.



PROFESSIONAL DEVELOPMENT

Mandatory PMSA Child Protection training is delivered to all employees on-line via the PMSA Staff Portal. It is a requirement that all staff complete this training on appointment and then on an annual basis. The training is assessment based with electronic records kept of completion. A copy of the document, ***“The Ten Commandments for Child Protection at PMSA Schools”*** is automatically provided to each staff member on completion of their on-line Child Protection training.

All PMSA employees are directed to the PMSA Child Protection Policy, PMSA Abuse Policy and to this Child Protection Risk Management Strategy, on the first Staff Professional Development Day of each new school year and at the time of appointment for all new staff.

In addition to the mandatory on-line Child Protection training, all schools provide on-going in-service training and education to employees in relation to behaviour management, anti-bullying, disabilities and the inclusion of child protection into risk management plans for high risk activities and special events.

PLANNING HIGH RISK ACTIVITIES AND SPECIAL EVENTS

Each PMSA school has a Risk Management Committee with the role of identifying risks to students of the school when developing risk management plans for high risk activities and special events in which students participate. The types of activities and events that would be included under this category include, but are not limited to, student billeting, sporting carnivals, school excursions and camps. All staff members are expected to report risk activities to the Committee, as well as to identify risks related to activities under their supervision to ensure child protection issues are addressed as part of the standard risk management processes in the school.

EXTERNAL CONTRACTORS

The PMSA recognises that there are risks associated with external contractors and consultants entering its schools, for construction projects and other services – e.g.: a risk that their employees may abuse students under the school’s care. Child protection risks are identified and managed in PMSA schools through agreements with all temporary or occasional contractors for their employees to:

- Be trained on appropriate behaviours in schools;
- Be made aware of the school’s child protection provisions (e.g.: knowledge of where they can be found).

Each PMSA school develops a simple statement on appropriate behaviours for all contractor staff and requires such staff to read and sign the document. If a contractor’s appointment becomes permanent or the contractor has employees visiting the school regularly, then a Blue Card will be requested by the PMSA school for these employees.



INTERNATIONAL HOMESTAY PROGRAMS

PMSA schools providing International Homestay Programs are required to comply with their legal requirements under the Education Services for Overseas Students (ESOS) Act 2000 (Cth), the Education (Overseas Students) Act 1996 (Qld), the PMSA Child Protection Policy, and the PMSA Homestay Risk Management Policy.

MARKETING AND ADVERTISING

All PMSA schools have in place a policy for the use of key messages and images featuring children and will ensure, in respect of photographs of students of PMSA schools that:

- The permission of the parent or guardian of the child has been obtained including specification by the parent and child as to how the image will be used; **and**
- When obtaining consent to use an image the child's confidentiality is maintained and the child is not put at risk or the child's best interest compromised.

COMMUNICATION AND SUPPORT STRATEGIES

Students and Parents

Policies and procedures have been developed for the education of students in all PMSA schools regarding the prevention of harm and the process for disclosure of or the suspicion of harm including self-harm.

The PMSA Child Protection Policy is made available to students and parents via individual school websites, student diaries, parent manuals and the PMSA website. The Policy is also displayed on at least one noticeboard within each school and the attention of parents and students drawn to the Policy at least twice a year via school newsletters. A copy of the PMSA Child Protection Policy is also available from Administration staff at each school. This Child Protection Risk Management Strategy is also available via the PMSA and individual school websites.

A "*Student Guide for Protection from Abuse or Harm*" is included in all student handbooks and students are informed at assembly and regular classroom meetings about how to protect themselves, and who to report to if they are concerned about their safety.

Employees

All PMSA employees are directed to the PMSA Child Protection Policy, PMSA Abuse Policy and this Child Protection Risk Management Strategy on the first Staff Professional Development Day of each new school year and at the time of appointment for all new staff. These policies are also directed to the attention of employees via the staff handbook.

Mandatory PMSA Child Protection training is delivered to all employees on-line via the PMSA Staff Portal. It is a requirement that all staff complete this training on their appointment and then on an annual basis.



RESPONDING TO DISCLOSURES AND SUSPICIONS OF HARM

The PMSA Child Protection Policy outlines the procedures for reporting and responding to disclosures of harm, including self-harm, regardless of whether:

- The harm to the child or young person has been caused by a person from within or outside a PMSA school, or
- The child or young person disclosing the harm is from within or outside a PMSA school.

Each PMSA school provides a register in the Principal's office of all incidents related to sexual abuse, harm or inappropriate behaviour. Where an incident is reported, full details, including the steps taken to resolve the incident, are entered in the register.

The Register of each school is audited annually by the PMSA Human Services Risk Manager, to ensure that allegations have been dealt with in accordance with published policies and procedures.

The PMSA has a comprehensive complaints handling procedure, for access by staff, parents and students, in cases where an issue is not resolved to their satisfaction.

MANAGING BREACHES OF PMSA CHILD PROTECTION POLICIES

The PMSA Child Protection Policy addresses consequences that may result when an employee at a PMSA school acts in contravention of their obligations under the Policy. Employee breaches of this Risk Management Strategy will also be managed in accordance with the processes associated with breaches of the PMSA Child Protection Policy.

Any breaches of *Section 5.2- Child Protection* of the *PMSA Human Resources Policy Manual* will be dealt with under *Section 7.2 - Handling Serious Misconduct or Professional Misconduct*, of the Manual.

RISK MANAGEMENT REPORTING AND REVIEW

Director - Protection From Harm, Member of the PMSA Education and Pastoral Care Committee

The PMSA Education and Pastoral Care Committee has a dedicated member, Director - Protection from Harm, with the responsibility for the oversight relating to child protection matters. The primary objective of this role is to assist the PMSA Council in fulfilling its duty in relation to the safety and wellbeing of members of the school community as follows:

1. Provides guidelines to assist all PMSA schools develop and implement policies and procedures for the prevention of abuse and for dealing with any allegations which may arise.
2. Receives and deals with complaints in respect of past students and staff.
3. Determines strategies for resolving complaints.
4. Communicates with PMSA's insurers.



5. Ensures full documentation is made of complaints and their resolution.
6. Oversees the management by the schools of complaints in respect of current staff and students.
7. Oversees and advises on awareness training for staff and education for students aimed at prevention.
8. Reports regularly to the PMSA Council on the issues before it.
9. Treats all allegations of abuse or suspected abuse seriously, sensitively and confidentially, subject only to such disclosure as is necessary to deal with the matter under the PMSA Child Protection Policy and as required by law.

Risk Management Reporting

Compliance with Child Protection legislation and PMSA Child Protection Policy requirements, any identified risks or incidences pertaining to child protection in individual schools and breaches of the PMSA Child Protection Policy and/or PMSA Child Protection Risk Management Strategy, are included in a Risk Management report provided by each PMSA School Council on a quarterly and annual basis respectively.

Incidents, risks or breaches of major significance, including criminal acts, are reported directly to the PMSA Councillors on a more urgent basis as they are identified. Consultation by the individual School Council Chairman and Principal with the PMSA Chairman to determine the trigger for such reporting is recommended.

Risk Management Review

The PMSA and its schools ensure that this Child Protection Risk Management Strategy is implemented, reviewed annually and updated as necessary to ensure compliance with the *Commission for Children and Young People and Child Guardian Act 2000*, and any other legislation which may, in the future be enacted in relation to child protection.

RELATED POLICIES AND DOCUMENTS

- PMSA Abuse Policy
- PMSA Child Protection Policy
- PMSA Human Resources Policy Manual
- PMSA Blue Card (Working with Children) Policy
- PMSA School's Accreditation Manual
- PMSA Anti-Discrimination Policy
- PMSA Homestay Risk Management Policy
- Student Guide for Protection from Abuse or Harm
- The Ten Commandments for Child Protection at PMSA Schools