



# Wollemi Flexi Schools Network

## Child and Youth Risk Management Strategy

The Wollemi Flexi Schools Network (WFSN) includes the Albert Park, Mount Isa, Southport and Rockhampton Flexible Learning Centre's, Edmund Rice Education Australia schools in the Edmund Rice Tradition.

### **PART 1: COMMITMENT**

#### **Statement of Commitment** (*mandatory requirement 1*)

Edmund Rice Education Australia (EREA) is committed to the safety and wellbeing of all students and children. EREA values and respects the preciousness and uniqueness of each student and child. In EREA we embrace the Gospel values of freedom, justice, love and respect and the teachings of Jesus and Blessed Edmund Rice. All children are precious in the sight of God who calls all of us to care for children and to take action where those in need may not be able to protect themselves.

Creating and maintaining the school as a place of safety in a supportive, nurturing community is an essential part of EREA's ethos and forms the basis of our commitment to the protection of students and children. EREA strives to ensure a culture within its schools and entities where all who have the responsibility and care of students and children understand that student and child protection is every person's responsibility. Important to developing this culture is ensuring the implementation of strategies enacted to minimise the risk of harm to students and children. That is, the education of staff and students about personal safety strategies and an acknowledgment by EREA schools and entities that the safety and wellbeing of students and children must be at the centre of every preventative and protective action they take.

Wollemi Flexi Schools Network's (WFSN), Child and Youth Risk Management Strategy has been developed in compliance with our obligations under the *Working with Children (Risk Management and Screening) Act 2000* and the *Working with Children (Risk Management and Screening) Regulation 2020* to promote and protect children and young people.

#### **Codes of Conduct** (*mandatory requirement 2*)

EREA has developed codes of conduct and standards of behaviour for employees, volunteers (including parents), students and other personnel (including contracted persons and groups) in consultation with relevant parties. These codes of conduct set out EREA's requirements in relation to the conduct of employees, volunteers, students and other personnel (including contracted persons and groups).

The EREA Northern Region Student Protection Processes complement the National Catholic Safeguarding Standards developed by Catholic Professional Standards Limited (2019) and reviewed by Australian Catholic Safeguarding Limited (2022).

#### **Wollemi Flexi Schools Network Employee/Volunteer Code of Conduct**

The Edmund Rice Education Australia (EREA) *Code of Conduct* details, clarifies and affirms the standards of behaviour required by EREA in the performance of their employees' duties and volunteers (including parents) in their activities in the school. All employees and volunteers must comply with the *Code of Conduct*. It forms part of the contract of employment for all persons employed at WFSN, including on a temporary, casual, fixed term or continuing basis and agreement entered into with persons (volunteers) who freely offer their services to WFSN.



The *Code of Conduct* is implemented to assist employees and volunteers within Edmund Rice Education Australia (EREA) to ensure that in their interactions with students/children they behave professionally at all times and observe appropriate boundaries, behaviour and conduct in accordance with EREA's standards and expectations and does not impact or otherwise harm students/children. In addition, the *Code of Conduct* covers the employees'/volunteers' duties in relation to risk management and duty of care obligations to students/children.

WFSN has uploaded a link to the EREA *Code of Conduct* to its website. EREA requires Principals and delegated persons to provide *Code of Conduct* training for all school employees. The *Code of Conduct* is available to all existing and new employees and volunteers and will be an essential component of the induction of all new employees and at the commencement of service for volunteers. All employees and volunteers are required to complete this training annually.

The *Code of Conduct* is complemented by EREA policies, including child protection processes and child protection legislation. Further, child protection processes and child protection legislation (or other statutes) will apply if there is any inconsistency with the *Code of Conduct*.

*The Code of Conduct includes obligations of persons who fulfil the definition of Employee or Volunteer.*

The *Code of Conduct* also sets out responsibilities of employees and volunteers which:

- govern interactions with students, management of students and physical contact with students
- govern interactions between colleagues
- outline expectations regarding the use of technology
- affirm Edmund Rice Education Australia's position on drugs, alcohol, tobacco, sexual harassment, workplace harassment and discrimination
- establish a process for reports and complaints to be made about breaches of the *Code*

### **Principles of Common Ground**

The school operates by using common ground principles. These allow for a democratic and inclusive community to operate in a way that respects the rights of all and enables meaningful educational engagement. The principles are, Participation, Respect, Safe and Legal and Honesty except for Wollemi Flexi Schools Network which are Respect, Rights, Relationship, Responsibility, Safe and Legal.

These principles guide group relationships. They represent broad ways for the school to establish a shared understanding that promotes appropriate personal relationships. The principles are used by the young people and staff to encourage learning, build personal relationships and resolve conflict. These principles are intentionally broad and are useful in that they do not totally define what should happen in any particular situation. This means that all members of the group, adults and young people, are asked to relate within the same standards based on the group's understanding of these principles.

### **EREA Child Safe Code of Conduct**

The EREA Child Safe Code of Conduct is designed to assist Edmund Rice Education Australia (EREA) Northern Region to meet its legal obligation to provide a Code of Conduct for interacting with children and young people. The Child Safe Code of Conduct complements and is part of the EREA *Code of Conduct*. Also, the Code is designed to enhance the requirements of EREA in its commitment to the provision of a safe and supportive environment for students and children entrusted to the care of schools within the Edmund Rice Education Australia Northern Region. This Code of Conduct applies to all Wollemi Flexi Schools Network employees contracted on a continuing, fixed term or casual basis. Volunteers (including parents) are also required to abide by the Code.



The EREA Child Safe Code of Conduct sets out the expectations of WFSN employees and volunteers in their interactions with students and children:

- appropriate professional boundaries
- appropriate student behaviour management
- appropriate physical contact with students/children
- preventing sexual misconduct

EREA requires WFSN to ensure that:

- the Child Safe Code of Conduct is implemented in the school and community;
- all employees and volunteers have access to a copy of the Code;
- parents are made aware of the Code.

## **PART 2 - CAPABILITY**

Procedures for recruiting, selecting, training and managing staff that enhance the safety and wellbeing of children and young people and the protection of children and young people from harm (*mandatory requirement 3*).

### **Recruitment and selection**

Wollemi Flexi Schools Network's recruitment and selection processes aim to recruit and select all staff and volunteers that work with students/children that are appropriately qualified and suitable for working with children and young people.

The Principals/Heads of Campus must comply with EREA's policies and procedures in relation to recruitment, selection, training and managing of staff and volunteers. These policies are available on the schools Policy Plus portal.

In advertising new positions in schools and entities, Wollemi Flexi Schools Network's advertising template states that:

*"Our organisation supports the rights of children and young people and is committed to providing a safe and supportive environment directed at ensuring their safety and wellbeing.*

*All applications for this position will be subjected to screening procedures as detailed in the Commission of Children and Young people and Childs Guardian legislation. These checks are consistent with Edmund Rice Education Australia's commitment to child protection policies and procedures."*

Wollemi Flexi Schools Network adheres to the requirements of the *Working with Children (Risk Management and Screening) Act 2000*, *Working with Children (Risk Management and Screening) Regulation 2020*, *Education (Accreditation of Non-State Schools) Act 2017 and Regulation 2017*, and the *Education (Queensland College of Teachers) Act 2005* with regards to employment.

All non-teaching personnel and volunteers working at WFSN are required to comply with EREA Northern Region Blue Card Screening Procedures. WFSN requires all non-teaching personnel, volunteers and trainee students who work with children and young people and who require a Blue Card under the *Working with Children (Risk Management and Screening) Act 2000*, to obtain a Blue Card prior to commencement and to maintain its currency. All teachers are required to produce evidence of current teacher registration with the Queensland College of Teachers ("QCT") before they commence work in EREA schools and a Blue Card - Exemption Card if relevant.



## Training and Management of Employees

Edmund Rice Education Australia (EREA) requires all staff and volunteers to complete induction training. Principals/ Heads of Campus are required by EREA to ensure that all staff and volunteers are provided with induction training on the school's processes and procedures, the values and expectations of EREA and the standard of behaviour required of by all staff and volunteers in their interactions with children and young people. EREA provides support to WFSN to provide a safe and supportive environment for children and young people. EREA conducts induction training for all new Principals, Entity Leaders, Heads of Campus and Deputy Principals. This training specifies requirements of the Code of Conduct and EREA's key documents and includes meeting key people in EREA who are available to support them in their positions.

All staff and volunteers who work within Wollemi Flexi Schools Network must complete the EREA Child Safeguarding Program within four weeks of commencing their employment or engagement. Volunteers are required to complete QCEC: Online Student Protection Training Modules at the commencement of their volunteer services. All staff are required to attend face to face Student/Child Protection training offered by the school/entity during the course of the school year and complete online mandatory training annually. Student Protection training covers the schools requirements under organisational policy and legislation in relation to reporting by all staff including volunteers, of suspicions or allegations of:

- sexual abuse/likely sexual abuse of students/children;
- harm or risk of harm to students/children caused by physical abuse, sexual abuse, emotional abuse or neglect; and
- inappropriate behaviour of staff to students.

This training provides the schools' employees sound skills to effectively identify, respond to and report suspicions or allegations, as required by law and EREA Northern Region's Student Protection Processes and Guidelines.

Additional on-going training is provided by Edmund Rice Education Australia and Queensland Catholic Education Commission and employees are encouraged to attend. Edmund Rice Education Australia's professional safeguarding staff co-ordinate learning opportunities for EREA Northern Region employees to enhance their professional or personal knowledge and skills.

The school gives their employees opportunities to attend courses relating to the wellbeing of students/children e.g. Bullying, Harassment, Behaviour Management of children/young people, students with special needs.

Where there is a complaint or allegation in relation to staff personnel or volunteer of inappropriate behaviour or misconduct the school takes appropriate management action which includes following the requirements of Child Protection legislation, the EREA Code of Conduct, EREA Northern Region Student Protection Processes and the *Queensland College of Teacher's Act 2005*.

EREA provides the Employee Assistance program to give free and confidential counselling to employees who require support.

## Other EREA Support for the wellbeing of children/young people

EREA acknowledges that students learn best in school environments in which they feel safe, physically and emotionally, free from bullying and intimidation. EREA and Wollemi Flexi Schools Network have developed policies, processes and resources to support the care and wellbeing of students.



Employees are made aware of these policies, processes and resources from time to time at staff meetings, 'in-service' days and staff notices. These policies and processes may include and address:

- Preventing and Responding to Student Bullying
- Management of Drugs and Other Prohibited Substances incidents in schools
- Management of Police Intervention and Interviews Conducted with Students on School Premises (Form F)
- Suicide Prevention guidelines and preparedness plan
- Students with Disabilities
- Student Attendance
- Acceptable Use of Technology
- Public Transport Use
- Administration of Medicine to Students
- Critical Incident Management

Every Edmund Rice Education Australia (EREA) Northern Region school employs a range of support staff to work with students, parents and staff and provide pastoral care, personal safety strategies, and support for marginalised students and students who may be at risk of being harmed.

### **PART 3 – CONCERNS**

#### **Policies and procedures for handling disclosures or suspicions of harm (*mandatory requirement 4*)**

##### **Student Protection Processes**

Edmund Rice Education Australia (EREA) Northern Region's Student Protection Processes provide a process for all staff and volunteers who work in EREA schools and entities to recognise, respond and report allegations or suspicions of:

- sexual abuse/likely sexual abuse of students/children;
- harm or risk of harm to students/children caused by physical abuse, sexual abuse, emotional abuse or neglect; and
- inappropriate behaviour of staff/volunteers to students/children.

EREA Student Protection Processes has been developed in accordance with the requirements of the:

- *Education (Accreditation of Non-State Schools) Act and Regulation 2017*
- *Education (General Provisions) Act 2006 and Education (General Provisions) Regulation 2017*
- *Working with Children (Risk Management and Screening) Act 2000*
- *Working with Children (Risk Management and Screening) Regulation 2020*
- *Child Protection Act 1999, the Education (Queensland College of Teachers) Act 2005*
- Non-State Schools Accreditation Board.

The EREA Northern Region Student Protection Processes complement the National Catholic Safeguarding Standards developed by Catholic Professional Standards Limited (2019) and reviewed by Australian Catholic Safeguarding Limited (2022).

In compliance with the law, reports are made to the Queensland Police Service in relation to allegations or reasonable suspicions of sexual abuse/likely sexual abuse of a child/young person or to the Department responsible for Child Safety for harm/risk of harm to a child/young person caused by sexual abuse, physical abuse, emotional abuse or neglect. If a report is made in relation to inappropriate behaviour of a staff member or volunteer towards a child/young person that report will be handled by the Principal/Delegate, with support from the EREA Director of Schools – QLD.



When advice is required from relevant external professionals' requirements of the law will be complied with. All staff and other personnel including volunteers must complete mandatory on-line training annually and EREA requires Principals/Heads of Campus to sign off that the mandatory training has been completed. A register of all employees and volunteers who complete the training is kept at WFSN's network support team and training reports can be exported as required. External audits are conducted.

The EREA Northern Region Student Protection Process is readily available for staff, other personnel, volunteers, parents/carers and students and school has it uploaded on their school website.

EREA has developed a system to enable central management and monitoring where a record of concern about student wellbeing is brought to the notice of the Director of Schools - QLD, including allegations or suspicions of sexual abuse or likely sexual abuse of a student/child, harm or risk of harm to a child/young person or inappropriate behaviour of any staff or volunteer towards a child/young person.

EREA has developed a complaints procedure to enable staff, volunteers, parents/carers or students to make complaints that the school has not complied with the Student Protection Processes. Staff, volunteers, parents/carers or students may make a complaint via the schools normal complaint process as per the Complaints Handling Policy and Guidelines. Principals/Delegate are required to handle these complaints in accordance with EREA Northern Region's Procedure for handling complaints about non-compliance in line with the EREA Northern Region's Student Protection Processes.

### **School based Student/Child Protection Contacts (Child Safeguarding Officers)**

In accordance with the *Education (Accreditation of Non-State Schools) Regulation 2017* schools must have two nominated staff members to whom a child/young person can report behaviour of another staff member that the child/young person considers to be inappropriate.

At Wollemi Flexi Schools Network two staff members are appointed as a Student/Child Protection Contact/Child Safeguarding Officer. The principal is the only person that can nominate Student/Child Protection Contact/Child Safeguarding Officers. The school also has appointed a Senior Child Safeguarding Officer to support the schools staff, parent/carers and students.

The role of the Student/Child Protection Contact/Child Safeguarding Officer is to assist staff, parents, students and volunteers in student/child protection matters and to assist staff to make a report when a complaint or allegation of harm to a student/child is received as outlined in EREA Northern Region Student Protection Processes. EREA requires the schools to make staff, volunteers, parents/carers and students aware of the schools Student Protection Contact/Child Safeguarding Officers, through school newsletters, posters prominently displayed in the school, provision of flyers during the enrolment process, school website and other ways specific to and chosen by the school. Information about the Student/Child Protection Contacts/Child Safeguarding Officers and requirements for their appointment is detailed within the EREA Northern Region's Student Protection Processes.

### **Director of Safeguarding, EREA**

Edmund Rice Education Australia (EREA) has appointed a Director of Safeguarding who will assist the Director of Schools – QLD and provides assistance and supports EREA schools, Indooroopilly Montessori Children's House and Mary Rice Early Learning Centre.



## **A plan for managing breaches of the Child and Youth Risk Management Strategy (mandatory requirement 5)**

Edmund Rice Education Australia (EREA) takes any breach of its Child and Youth Risk Management Strategy seriously. Breaches may be dealt with as follows:

- if the alleged breach relates to the actions of an employee, the Principal (in consultation with the Director of Schools, EREA) will manage this, as appropriate, in accordance with its Employee Misconduct Process and Unsatisfactory Performance Process;
- if the alleged breach relates to a report of inappropriate behaviour of a staff member or volunteer to a child/young person, EREA will manage this in accordance with the process set out in the EREA Code of Conduct and the EREA Northern Region Student Protection Processes;
- if the breach relates to a complaint about Non-Compliance with EREA Northern Region Student Protection Processes, that complaint will be dealt with in accordance with the schools Complaints Handling Policy and Guidelines and EREA Northern Region's Student Protection Processes and legislative requirements in relation to complaints about non-compliance.
- if the breach relates to the action of a contractor, EREA Northern Region will take appropriate action under EREA Northern Region's contract with the contractor.

## **A risk management plan for high-risk activities and special events (mandatory requirement 6)**

### **Risk Management Tools**

Edmund Rice Education Australia Northern Region (EREA) requires the school to consider all curriculum and non-curriculum activities in terms of their level of risk. When undertaking all activities or special events (i.e. low, medium or high) the school undertakes responsibility for identifying potential risks and considering the safety and wellbeing of children/young people and the risk of harm to children/young people.

EREA requires the school to develop and implement a risk management plan to remove or minimise the risk of harm to children/young people. The plan includes risk management assessment and risk mitigation which is carried out for activities undertaken within the school and outside the school. Wollemi Flexi Schools Network accesses the Queensland Government *Child and Youth Risk Management Strategy Toolkit and Blue Card Services Learning Portal – Risk Management* to assist them in relation to risk assessments and risk management plans. The school is able to access support from EREA Northern Region in the development and implementation of risk management plans.

The school has access a Workplace Health and Safety Officer (“WHSO”) on the network support team who provides support, if requested, to carry out risk assessments and develop and implement a risk management plan. Internal audits are carried out to ensure that the school is complying with legislative requirements and the school ensures that WHS is discussed at every whole staff team meeting.

### **Risk Management for Excursions and other Activities**

In Edmund Rice Education Australia (EREA) Principal and Head of Campus are responsible for approving all excursions, retreats, immersion programs and school and outside school activities. The school has developed parent/carer permission forms and documentation covering excursions (including WH&S standards and Risk Management Plans). The school uses an online offsite excursion risk assessment/plan product to support staff in the planning, documentation and operations of offsite excursions and allow Principal/Head of Campus direct line of sight to identify, assess and manage risks associated with excursions, school camps, school retreats, immersion programs and outside school activities particular to the school. School staff are required to complete all child safeguarding checklists as part of the offsite excursion management system as part of documenting the formulation of risk assessment and management of student protection.

Wollemi Flexi Schools Network requires the contact details for all students and staff attending immersion programs run abroad. The appropriate forms can be found on the EREA website in the Principals Compendium.



## Other Strategies to Minimise Risks of Harm

EREA and Wollemi Flexi Schools Network take seriously their commitment in relation to the safety and protection of children/young people and have developed strategies and procedures to manage risks of harm to children/young people, for example:

- Supervision – the school must manage the supervision of children/young people appropriately to ensure that there is adequate supervision of children/young people as detailed in the EREA Code of Conduct and the schools Position Statement.
- Emergency/Critical Incident situations – the school has in place procedures to handle emergency situations and critical incidents and are briefed to appropriately handle such situations. These procedures must be sanctioned by Edmund Rice Education Australia.
- Fire/Lockdown – the school has procedures to address such situations and must ensure that all employees and volunteers are made aware of fire evacuation and lockdown procedures at the school/entity.
- Visitors/Outsiders – the school has have procedures in place for the management of visitors and other outsiders, including relevant signage and directions together with a visitor sign in register and procedures for signing in and out of the school. These procedures include the wearing of a visitor’s pass where appropriate.
- Media/Communications strategies – the school has permission from parents/carers using the forms available for the use of child/young person photographs and names in any materials issued to the public in printed or electronic form. Identifying information of children/young people must not be used in promotional material without the specific permission of the parents/carers and the students concerned.
- Computer/Internet - All employees and students are required to observe the Edmund Rice Education Australia Acceptable Use Policy and a Consent Form is implemented.
- Travel – discussed with parent/carers and young people at point of enrolment. Ongoing safety discussion and working agreements include travel expectations of young people. Parent/carers are included in appropriate discussions around travel safety.

## **PART 4: CONSISTENCY**

Policies and procedures for compliance with Chapter 8 of the *Working with Children (Risk Management and Screening) Act 2000* (which regulates the Blue Card system) (*mandatory requirement 7*)

### **Blue Card Requirements and Employee Register**

Edmund Rice Education Australia (EREA) Screening Policy details EREA Northern Region’s requirements in accordance with the *Working with Children (Risk Management and Screening) Act 2000* to ensure that the required personnel hold a Blue Card. The school Principals/Head of Campus must comply with the requirements of the EREA Screening Policy.

In accordance with legislative requirements EREA requires all non-teaching staff, volunteers, trainee student teachers, student placements and school students (e.g. undertaking paid work within schools and Boarding facilities) who work with children/young people under 18 years of age to obtain and hold a Blue Card (unless exempt), including:

- all school employees who are not registered with either the QCT or the Australian Health Practitioner Regulation Agency;
- all employees of EREA
- volunteers (who are not parents of enrolled students);
- placement teachers undertaking practical teaching sessions as part of compulsory academic course requirements;
- all direct contact contractors that are engaged by the school to directly work with students
- self-employed people, paid employees other than EREA employees and volunteers whose usual duties include, or are likely to include, the teaching, coaching or tutoring of a child, individually on a commercial basis;
- students who undertake formal traineeships as part of their studies which involve work in child related employment, including conducting sport and recreation activities directed at children; and
- School Advisory Council members (excluding current parents on a board of their own child’s school/entity)



EREA requires the school to maintain a Blue Card Register for all eligible employees, volunteers, trainee student teachers and placement teachers. The school has a Screening Contact Person who is appointed by the Principal. EREA requires that the Screening Contact Person is an appropriate Leadership Team Member, Business/Personnel Manager or delegate appointed by the Principal. The school's student management system is used to maintain the Screening Register so that details are available to the EREA Director of Schools - QLD when requested. The EREA Director of Schools - QLD may request external audits of the school's Screening Register and other relevant details/information.

All teachers employed by EREA must be registered with the QCT. The Principal/delegate is required by EREA to sight QCT registration and formal ID, undertake a QCT registration search and relevant qualifications before employment commences. New non-teaching staff and volunteers must hold a valid Blue Card and be linked to the school via Blue Card Services prior to commencing work.

### **Procedures for reviewing the Child and Youth Management Strategy**

To ensure that Wollemi Flexi Schools Network's Child and Youth Risk Management Strategy remains current and effective, this strategy will be monitored and reviewed annually. In the event that the school identifies concerns, Wollemi Flexi Schools Network's Child and Youth Risk Management Strategy will be reviewed.

In the review, Wollemi Flexi Schools Network will record the date of the review, where the review took place, who was present and what was discussed. Issues to be considered in the review include:

- whether EREA's policies and procedures were followed;
- the effectiveness of EREA's policies and procedures in preventing or minimising harm to children/young people;
- the effectiveness of the school's procedures and guidelines in preventing or minimising harm to children/young people;
- whether any risk management incidents/issues occurred;
- the process used to manage any incidents/issues;
- the content and frequency of training in relation to EREA Northern Region's Student Protection Policy, Processes and Guidelines
- child safeguarding audit completed six monthly

On completion of the review, the school's employees, parents and volunteers will be advised of any changes to EREA's policies/procedures or school based procedures as a result of the review and where appropriate training will be provided.

### **Strategies for communication and support (mandatory requirement 8)**

#### **Student Protection Training**

As discussed previously in this document, all school staff must complete mandatory EREA Child Safeguarding online training. All staff can readily access the EREA Child Safeguarding program and are required to complete online child protection training annually.

EREA requires WFSN staff to attend annual in-services/workshops on Student/Child Protection and EREA Northern Region's procedures and the process for reporting child abuse incidents as required. These in-services/workshops include reporting the behaviour of a staff member, other personnel or volunteer that a child/young person considers to be inappropriate. These in service/workshops may be delivered via online as part of annual training on professional boundaries.



The school has the EREA Student Protection Policy, Processes and Guidelines readily accessible to staff, other personnel, volunteers, students and parents. This document is uploaded to the schools website, schools administration office and is discussed during enrolment interviews. Parents and students receive regular student/child protection/personal safety information through the schools newsletters. The Principal/Head of Campus ensures that the schools Student Protection Contact/Child Safeguarding Officers names are displayed prominently on posters and the schools digital display visible for all staff, volunteers, students, parent/carers and visitors.

### **Training on Wollemi Flexi Schools Network’s Child and Youth Management Strategy**

Wollemi Flexi Schools Network has a copy of the schools’ Child and Youth Management Strategy uploaded on the school’s website and available at the schools administration. Parent/carers and students are informed on how to access these documents and are provided flyers on child safeguarding, reporting inappropriate behaviour and code of conduct during the enrolment process.