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## 1. Scope

The scope of this document covers all operations of Connect 'n' Grow® (CnG) Australia wide. This applies to all students, employees, including full-time, part-time, and casual employees, as well as contractors, volunteers and other workers undertaking work experience or vocational placements.

## 2. Objective

The objective is to provide a risk management strategy framework which helps to identify potential risks and potentials risks of harm to children and young people attending CnG programs and to implement strategies to minimise these risks.

Also, to clearly outline our Risk Management Strategy (RMS) to achieve our objectives and provide a consistent framework to guide and support the stakeholders who work for our organisation and those who benefit from our services.

## 3. Roles & Responsibilities

The Head of Teaching, Learning and Professional Development (HoTLPD) will review this procedure **yearly** to ensure it is current to all regulatory requirements, compliance with blue card requirements and incorporates continual improvement. When reviewing this document, the review must not interfere with any court processes in progress and provide information regarding the changes to our stakeholders. Additionally, this person is also responsible for overseeing and managing any child safety issue which may arise and to ensure this procedure is implemented throughout our programs.

Expert Health Trainers (EHTs) play a vital role in the support, program delivery and marking of our Health and Community Service programs to enrolled students including schools and the Deadly Start and Wesley Mission Traineeships Programs.

It is the responsibility of all CnG staff and other workers to always comply with requirements of this procedure.

## 4. References & Definitions

### Internal

<a href="#">Code of Conduct Internal</a>	CnG/NAT/PC/SOP-01_PG01
<a href="#">Workplace Health and Safety Procedure</a>	CnG/NAT/PC/SOP-03
<a href="#">WHS Incident Report</a>	CnG/NAT/PC/SOP-03_Form01
Complaints and Appeals Procedure	CnG/NAT/PC/SOP-06
Recruitment and Selection Procedure	CnG/NAT/PC/SOP-08
<a href="#">Schools Trainers SELF Register</a>	CnG/NAT/QC/SOP-03_RG02
Risk Management Procedure	CnG/NAT/QC/SOP-05
<a href="#">Risk Matrix.pdf</a>	CnG/NAT/QC/SOP-05_IN01
<a href="#">Training, Learning &amp; Professional Development Procedure</a>	CnG/NAT/TD/SOP-01
<a href="#">Details of Disclosure or Suspicion of Harm Form</a>	CnG/NAT/TD/SOP-04_Form01
<a href="#">Child &amp; Youth Safety Statement of Commitment</a>	CnG/NAT/TD/SOP-04_IN01
<a href="#">Child &amp; Youth Safety Code of Conduct</a>	CnG/NAT/TD/SOP-04_IN02
<a href="#">Trainer Procedure</a>	CnG/NAT/TD/SOP-02

Student Procedure

CnG/NAT/TD/SOP-03

**External**

<a href="#">Users' guide to Standards for RTOs 2015</a>	ASQA
<a href="#">Education and Care Services National Law Act 2010</a>	National Law
<a href="#">Statutes Amendment (Child Sexual Abuse) Act 2021</a>	SA Dept for Education
<a href="#">RRHAC-EC mandatory notification training (SA only)</a>	SA Dept for Education
<a href="#">Applying for a Screening Check SA</a>	SA Govt
<a href="#">Children and Young People (Safety) Act 2017</a>	SA Govt
<a href="#">Child Safety (Prohibited Persons) Act 2016</a>	SA Govt
<a href="#">Child Safety (Prohibited Persons) Regulations 2019</a>	SA Govt
<a href="#">Child Safe Environments Compliance System (CSEC) User Manual</a>	SA Govt
<a href="#">Department of Human Services (DHS) Compliance Statement</a>	SA Govt
<a href="#">DHS Organisation Portal for WWCC checks</a>	SA Govt
<a href="#">Plink</a>	SA Govt
<a href="#">Work Health and Safety Act 2012</a>	SA Govt
<a href="#">Work Health and Safety Regulations 2012</a>	SA Govt
<a href="#">Working with Children Check guidelines</a>	SA Govt
<a href="#">Working with Children Checks Website</a>	SA Govt
<a href="#">SafeWork SA Incident Notifications</a>	SafeWork SA
<a href="#">Child and Youth Risk Management Strategies (Qld Blue Card)</a>	Qld Govt
<a href="#">Blue Card Fact Sheet &amp; Useful References</a>	Qld Govt
<a href="#">Blue Card online application portal QLD</a>	Qld Govt
<a href="#">Child Protection (Offender Reporting and Offender Prohibition Order) Act 2004</a>	Qld Govt
<a href="#">Dangerous Prisoners (Sexual Offenders) Act 2003</a>	Qld Govt
<a href="#">Working with Children (Risk Management and Screening) Act 2000</a>	Qld Govt
<a href="#">Working with Children (Risk Management and Screening) Regulation 2020</a>	Qld Govt
<a href="#">Workplace Health and Safety Act 2011</a>	Qld Govt
<a href="#">Workplace Health and Safety Regulation 2011</a>	Qld Govt
<a href="#">WorkSafe QLD Notifiable Incidents</a>	WorkSafe QLD

**Definitions**

**Accident** means accidents resulting in a serious injury that in CnG's opinion requires medical assistance.

A **breach** is any action or inaction by any member of CnG organisation, a visitor or other worker, including children and young people, that fails to comply with any part of the Risk Management Strategy as laid out in this procedure.

**Harm** is defined as 'any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing' (section 9 of the Child Protection Act 1999).

An **institution** is defined as an entity, other than an individual that:

- provides services to children;
- operates a facility for, or engages in activities with, children under the entity's care, supervision or control;

- may include government and non-government entities, including a government department.

**Medical Assistance** means that the child must see a doctor, nurse, or other health care professional.

A **prescribed offence** includes offences as listed in the various Commonwealth, States and/or Territories of Australia legislation. They include but are not limited to the following: Murder, Manslaughter, Kidnapping and unlawful child removal, Rape and other sexual offences, Incest, Child exploitation offences, assault with intent, Offences committed overseas involving child pornography material or child abuse material, Conspiracy to commit or an attempt to commit an offence referred to above, Aiding abetting counselling or procuring the commission of an offence referred to above.

A **prescribed person** means an adult who is an employee of an institution which includes:

- a person who is self-employed who carries out work for the institution, or
- a person who carries out work under a contract of services for the institution, or
- a person who undertakes practical training with the institution, or
- a person who carries out work as a volunteer for an institution.

A **prescribed position** means a position will be taken to be a position in which a person is likely to work with children if, in the ordinary course of his or her duties, it is reasonably foreseeable that a person in that position will work with children.

**Presumptive disqualification offence** means an offence, or class of offences, declared by the regulation to be a presumptive disqualification offence (but does not include an offence that is a prescribed offence).

**Reasonably believes** – Believes on grounds that are reasonable in the circumstances.

**Reasonable grounds** – Suspect that a child may be at risk of significant harm based on your observation of the child or what has been reported to you about a child.

**Responsible person** – Means a person referred to in section 162(1)(a) to (c) of the Education and Care Services National Law.

CnG **Risk Management Strategy (RMS)** is outlined in this procedure and applies to everybody who is involved with CnG, including children, parents, contractors, and all other people relevant to our organisation's operations.

**Worker** – A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as— (a) an employee; or (b) a contractor or subcontractor; or (c) an employee of a contractor or subcontractor; or (d) an employee of a labour hire company who has been assigned to work in the person's business or undertaking; or (e) an outworker; or (f) an apprentice or trainee; or (g) a student gaining work experience; or (h) a volunteer; or (i) a person of a prescribed class.

## 5. Statement of Commitment

Connect 'n' Grow<sup>®</sup> supports the rights of children and young people and is committed to providing a safe and supportive service environment directed at ensuring their safety and wellbeing at all times whilst attending any of our programs.

Our daily operations are strongly based on our values which include making student centric decisions – We believe in placing the student’s best interests at the centre of our decision making.

Connect 'n' Grow<sup>®</sup> is committed to meeting its responsibilities in relation to harm, or allegations of harm, of students under 18 years old. We comply with accreditation requirements and all relevant legislation in the jurisdictions of our operations.

We are dedicated to supporting this commitment and are dedicated to our Child & Youth Risk Management Strategy which has procedures in place to effectively address the safety and wellbeing of children in our care.

We ensure that a safe and inclusive culture is provided by demonstrating that children and young people are valued and respected. We are committed to child safety and wellbeing, understanding of children’s developmental needs and culturally safe practices.

All children have rights, no matter who they are, where they live, what their parents do, what language they speak, what their religion is, their sex or gender, what their culture is, whether they have disability, whether they are rich or poor.

Connect 'n' Grow<sup>®</sup> has a **Vivid Vision** for the future which includes:

**Our Vision:** A world where health pathways happen through quality education.

**Our Mission:** To build a job ready health and human services workforce that provides care to all.

**Our Philosophy:** A career in health is a journey that requires a gradual and consistent development of skills over time.

Our Expert Health Trainers and other Trainers are made aware of the requirements of our Child & Youth Risk Management Strategy Procedure.

## 6. Code of Conduct

Connect 'n' Grow’s<sup>®</sup> Code of Conduct outlines the standards of behaviour that are expected of all our employees, children, young people, and other workers during any and all of our programs and daily operations.

Behaviour	Appropriate	Inappropriate
Language	All parties to speak respectfully to one another at all times.	Must not use swear words, derogatory terms, sexual jokes and innuendo.
Supervision of children	Children will be supervised during classes and remain on site for any breaks.	Children must not leave the teaching location until the end of the class.
Physical contact	To assist in a child’s injury management. To demonstrate a skill or for instructional purposes as part of an activity.	No violent or aggressive behaviour such as hitting, kicking, slapping or pushing. No kissing or touching of a sexual nature.
Relationships and one-on-one contact	Professional boundaries must be maintained at all times. Small token gifts from teacher to students as a recognition of good work during classes.	No inappropriate text or social media contact with students. No one-on-one contact with students outside of the teaching location.
Behaviour management	Keep hands / feet to yourself. Be kind, use manners and be a good listener. Respect rights of others including children. Actively participate in class and allow others to learn.	Cheating, plagiarising, impairing others, collusion, slander, failure to comply with reasonable instruction / supervision, put another person risk, verbal assault, threatening comments or physical gestures, discrimination,

	Respect others and their property. Students to submit their own work. Always have good hygienic practices.	harassment, intimidation, disorderly conduct, disruptive / abusive / anti-social / criminal behaviour, stealing, breaches of privacy.
Transport of children or young people	Only for approved and organised excursions.	Not at any other times.
Change rooms/toilets	Separate toilet facilities provided for boys and girls. Toilet breaks are provided when needed.	Children are not permitted to enter a toilet of another sex and are not to accompany another student of the opposite sex into a toilet or change room.
Managing injuries or illness	Teachers are to provide adequate supervision (and first aid, if applicable) of a child who is sick or injured. Teachers to notify emergency services & parents of any significant injury.	Inappropriate touching whilst providing treatment of injuries.
Photography and use of technology & social media	Signed consent is received before photographing any student. Obtain parent's consent if the student is under 18 years. The consent form clearly depicts how the image/s or information may be used.	No image or personal identifying information to be publicised unless consent has been received. No personal interaction between teachers and students on social media. Students are not to use our computers or post any derogative information of our programs on any form of social media or any form of cyberbully. Mobile phones are not to be used during classes.
Smoking, alcohol consumption, use of drugs and medications	Students to advise teachers of any prescribed medication and ensure consumption of same is in accordance with the doctor's instructions.	Students are not permitted to smoke, consume alcohol or illegal drugs at teaching locations. Teachers are not permitted to turn up for classes while under the influence of alcohol or other drugs
General safety	Teaching location risk assessments are conducted to identify any site specific hazards. Teachers supervise students whilst they are using on site equipment.	No one is to put another person at risk. Students are not permitted to misuse equipment on site.
Confidentiality of information	Personal information is securely stored and is only accessed by authorised persons.	Personal information is not to be shared with any external party without prior written consent from the person concerned.

Breaches of our Code of Conduct will be dealt with in accordance with our Child & Youth Risk Management Strategy Procedure.

## 7. Procedure Content

### 7.1. Awareness and Accessibility of Procedure

CnG communicate the contents of this procedure to staff, students, and parents in relation to the health, safety and conduct of staff and students during induction.

CnG publish our Statement of Commitment and Code of Conduct on our website and display them in our offices.

### 7.2. National Principles for Child Safe Organisations

CnG endeavour to follow the basic principles for providing a Child Safe Organisation as follows:

1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints and concerns are child focused.
7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the national child safe principles is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

### 7.3. Recruitment, Selection, Training & Management

CnG have a separate procedure in place to maintain a strong child-focused recruitment process. (Refer **Section 4** above) This provides:

- a deterrent and helps to identify applicants who are not suitable for our organisation,
- assists to find people who are qualified and who will contribute to facilitate a safe and supportive environment for children and young people,
- ensures that our staff receive adequate and appropriate training to deliver child-related services in a safe and productive way, and
- ensures that any issues with staff performance or conduct are identified early and actioned appropriately.

Position descriptions are maintained for the various roles within our organisation. These outline the position and the skills, experience and responsibilities required for the role.

Selection criteria are framed to assess commitment, understanding, attributes and values required of the position, particularly as they relate to children and young people.

Applications are subjected to Blue Card (Qld) / Working with Children Checks (WWCC SA), referee checks, identification checks requests for any additional information the applicant may disclose relevant to their eligibility to engage in activities involving children and young people.

Our selection process includes an interview process and referee checks.

The selected candidate will then be placed on a probationary period of employment.

We train our staff in procedures relating to the health, safety and conduct of staff and students upon their induction to reduce exposure to risks. This includes how to recognise and respond effectively to children and young people with diverse needs. Staff also receive ongoing training, support, and information when they begin their new role, and for existing staff to develop new skills and knowledge to meet the requirements of their positions.

We have processes in place to monitor training requirements of our EHTs/Trainers in an ongoing basis.

We ensure management procedures are in place to support and encourage safe and supportive environments for children and young people and that they are consistent, fair, and supportive.

## 7.4. Working with Children Check (SA only)

CnG trainers working in South Australia (SA) must have a Working with Children Check (WWCC). These are valid for 5 years.

The trainer's unique ID needs to be included in the WWCC. After a WWCC clearance is granted, information sources (from bodies including SA Police and Department for Child Protection) are monitored for any new information relevant to a person's check status. Also, the Screening Unit is notified when a person is prohibited from working with children in another state or territory.

If new information means a person's clearance status is changed or revoked, the person and all known organisations will be notified.

### **Workers Responsibilities**

If a trainer had a WWCC, they must notify the Screening Unit if any of the following occur:

- you change your name, or start using another name or names,
- you become prohibited from working with children in another state or territory,
- you become a registrable offender under the *Child Sex Offenders Registration Act 2006*,
- you make a disclosure to your employer under section 66 of the *Child Sex Offenders Registration Act 2006*,
- there is a change in the *assessable information* relating to you and the information arose after your most recent WWCC. Assessable information includes, but is not limited to, criminal charges, criminal convictions and findings of guilt, child protection matters, disciplinary and misconduct matters, cancellation of an approval as a foster parent, intervention orders, and restraining orders.

It's an offence to refuse or fail to notify the Screening Unit of this information.

Before a trainer can notify the Screening Unit, they'll need to verify their customer details with the Screening Unit. This ensures that they are the right person and that the right details are being changed or updated. Once verified, they will be sent an email with a link that will allow them to notify the Screening Unit of a change in information.

Receipt of any of the above information may result in the Screening Unit conducting an additional WWCC in relation to them and a change in their WWCC status.

### **Employer/organisation responsibilities**

It's an offence to employ a person to work with children without a WWCC.

CnG have additional obligations under the *Child Safety (Prohibited Persons) Act 2016*. For any prescribed position, where it's reasonably foreseeable that a person will work with children, employers must do the following.

### **Verify an employee has a check and they are not prohibited**

An employer can only employ a person in a prescribed position if they have verified:

- that the person has had a Working with Children Check conducted in the last 5 years, and
- that the person is not prohibited from working with children.



CnG can verify a person has a check through our [organisation portal](#).

**Verify an employee has a check at least once every 5 years**

An employer who employs a person in a prescribed position must verify every 5 years:

- that the person has had a Working with Children Check conducted in the last 5 years, and
- that the person is not prohibited from working with children.

CnG can verify a person has a check through the authorities [organisation portal](#).

**Advise the Screening Unit if CnG become aware of any assessable information in relation to an employee**

Employers are required to make a report to the Screening Unit if they become aware that a person they are employing in a prescribed position:

- Has new *assessable information*. For example, the person has been charged with or found guilty of an offence or is subject to disciplinary or misconduct proceedings, an intervention or restraining order.
- Is prohibited from working with children in another State or Territory.
- Becomes a registrable offender under the *Child Sex Offenders Registration Act 2006*; or
- makes a disclosure to you under section 66 of the *Child Sex Offenders Registration Act 2006*.

This is known as a Section 19 report, and can be made through the SA Govt organisation portal. It's an offence (with a maximum penalty of \$25,000) to refuse or fail to notify the Screening Unit of this information.

**Right of review**

If a trainer has been issued with a prohibition notice they may be able to apply directly to the South Australian Civil and Administrative Tribunal (SACAT) to review the decision of the Screening Unit to issue the prohibition notice (conditions apply).

The application to SACAT should be made within 14 days after the prohibition notice is received. SACAT may allow an extension of time in certain circumstances.

**Revocation**

A trainer may apply to the Screening Unit to have a prohibition notice revoked if:

- the prohibition notice was issued in error - e.g. mistaken identity,
- there is fresh and compelling assessable information that, if assessed during the original WWCC, would have materially affected the determination to prohibit a person.

The person will need to provide evidence to support their application such as court documents or transcripts, police reports, professional reports or assessments, or statutory declarations.

The person cannot apply to have their prohibition notice revoked if:

- they have been found guilty of a prescribed offence committed as an adult (unless the conviction is now spent)
- they are prohibited from working with children under the law of the Commonwealth, or of another state or territory.

The Screening Unit may refuse to consider an application to revoke a prohibition notice if an application to revoke the same notice has been considered in the last 5 years.

E-mail [DHS.ScreeningUnitPolicy@sa.gov.au](mailto:DHS.ScreeningUnitPolicy@sa.gov.au) to apply for a revocation.

CnG monitor the status of our EHTs/trainers by recording their WWCC registration number and its expiry via our Schools\_Trainers\_SELF Register on SharePoint. This is a manual process by our Quality and Compliance team and is an ongoing process.

## 7.5. RRHAN-EC Part 1: Fundamentals Course (SA only)

To work in education, it is necessary to do mandatory notification training. This training is called Responding to Risks of Harm, Abuse and Neglect – Education and Care (RRHAN-EC). This is a course about mandatory notifications and child protection in education.

Fundamentals Course is a self-directed online course with an approx. running time of 2 hours. There are no minimum requirements for this course. This course is required to be completed yearly.

## 7.6. RRHAN-EC Part 2: Masterclass Qualifications (SA only)

This course/workshop is available to be attended in person or online and runs for approx. 4 hours. Access to the course is available via the following process:

1. Login to Plink (External References **Section 4** above) and then search for RRHAN-EC Fundamentals and Masterclass combination course. New non-department users can create a login.
2. Complete part 1 – fundamentals course.
3. Continue with part 2 – open the masterclass catalogue to choose a training provider and book in for masterclass. Sessions are listed in date order. Compare the price, location and delivery mode and select one that most suitable.

Bookings for Masterclass cannot proceed until the fundamentals course (part 1) (**Section 7.6** above) has been completed. This masterclass is also used if someone's role changes to include work with children or young people. For example, if a volunteer gets a role at a school, they must complete this masterclass.

Once the RRHAN-EC training has been completed a certificate is issued. The expiry date is shown on the certificate. A copy of the certificate is to be emailed to [compliance@connectngrow.edu.au](mailto:compliance@connectngrow.edu.au). Mandatory notification training is run on a 3 year cycle as such accreditation training must be refreshed every 3 years.

If the certificate will expire soon: A 2 hour online course becomes available in 'Plink' several months before the certificate expires. It is recommended to complete that training before the certificate expires to avoid any gaps.

If the certificate has expired: The trainer is required to do new training. This includes both Part 1 (Fundamentals) and Part 2 (Masterclass).

## 7.7. Blue Card (QLD)

The Blue Card system is Queensland's Working with Children Check and is regulated by 2 pieces of legislation (Refer **Section 4** above). It is made up of 4 components:

1. Individuals working or volunteering activities with children are required to have a Blue Card in Queensland.
2. Applications are subject to a National Reference System (NRS) database search to determine if another state or territory has made an adverse working with children decision about the applicant. The Blue Card check is more than a police check. It looks for:
  - a charge or conviction for any offence in Australia, even if no conviction was recorded (this includes spent convictions, pending and non-conviction charges),
  - child protection prohibition orders (both respondents and subjects to the application),
  - disqualification orders,
  - reporting obligations under the Child Protection (Offender Reporting and Offender Prohibition Order) Act 2004 or Dangerous Prisoners (Sexual Offenders) Act 2003,
  - disciplinary information from certain organisations (this includes information about teachers, childcare licensees and foster carers),
  - domestic violence information,
  - other information about the person that is relevant to deciding whether it would be in the best interests of children to issue a blue card,
  - police investigative information relating to allegations of serious child-related sexual offences, even if no charges were laid.
3. Ongoing daily monitoring and compliance with Blue Card requirements by Queensland Police Service. Business operators are also monitored to make sure they are complying with their obligations under the Blue Card system.
4. CnG, as a teaching organisation, has developed and implemented a Child & Youth Risk Management System as laid out in this procedure.

### **Rights and Obligations - Individuals**

Before starting to assess information from the blue card check the authority will:

- give the applicant a copy of all the information they have received,
- give the applicant a chance to tell their side of the story by making a submission,
- make sure the applicant understands the process and how the information will be assessed,
- consider all information the applicant has provided before making a final decision.

The applicant also has the right to:

- withdraw their application while it is being processed,
- use their valid blue card for other child-related work,
- cancel their blue card.

If a person is refused a blue card, they may be able to apply to the Queensland Civil and Administrative Tribunal (QCAT) to have our decision reviewed.

Applicants or card holders have obligations. If a person doesn't comply with these obligations, you could face penalties.

#### **Changes to personal and employment information.**

Applicants must advise authorities within 7 days if they change their personal details change or their employment circumstances change.

Card holders must advise authorities within 14 days if:

- their personal details change,
- their employment circumstances change,
- they lose their blue card,
- their card is stolen.

#### **Changes to police information**

As an applicant or card holder, you must immediately let the authority know if your police information changes by completing a change in police information notification.

#### **Suspension of blue card or exemption card**

An applicant or card holder with a suspended blue or exemption card must:

- not apply for, start or continue child-related work,
- not start or continue a child-related business,
- return their card to the authority immediately unless already surrendered to the Queensland Police Service.

Once their charge is finalised, the authority will re-assess their eligibility to hold a blue card.

The authority will tell the card holder and CnG whether their card is continued or cancelled.

CnG monitor the status of our trainers by recording their Blue Card registration number and its expiry via our Schools\_Trainers\_SELF Register on SharePoint. This is a manual process by our Quality and Compliance team. This is an ongoing process.

## **7.8. Risk Management**

CnG have a risk management procedure and processes in place to have risk assessments conducted for each teaching location. These Risk Assessments reviewed at least every 2 years or earlier if an incident has occurred at that location.

When conducting risk assessments of teaching locations, we consult with students to obtain their feedback as to identify anything they may regard as being unsafe either physically, technologically, or mentally. Their feedback is taken into consideration for mitigating any risks or potential risks they have identified.

CnG have an Incident/Hazard/Near Miss reporting process in place to assist in monitoring and mitigating risk.

Our Risk Management Strategy includes and is not limited to:

- Physical and online risks, including risks from child to child and adult to child interactions and also the nature of physical environments; and
- Trainers and EHTs having appropriate security checks by ensuring they have either a RRHAN-EC (Parts 1&2) Certificate (SA only) and in other locations a current Blue Card; and
- Our Child & Youth Risk Management Strategy Procedure is reviewed **yearly**.

## 7.9. High Risk Activities and Special Events

High risk activities and special events require extra planning. Examples:

- Whether the activity or event involves people who are external to CnG, and/or
- Take place in a location other than an approved CnG training location or a location with a large amount of people and/or other hazards.

CnG will develop a specific plan to manage a high risk activity or event to reduce any opportunity of harm to program participants.

Plans include:

- Include context of the activity/event
- Nature of the activity
- The people involved
- Objectives of activity
- Supervision of children
- Ratio of adults to children
- Transportation
- Toilet and change room facilities
- Management of medicines & allergies
- Emergency procedures
- Identification of any risks presented by the physical environment
- Relevant consent forms including emergency contact details
- Identify specific risks & control measures already in place and if additional control measures are required
- Analyse and evaluate the risks
- Manage the risks and assess and review

When making a plan, the risks are to be analysed, assessed and managed. During this process the CnG Risk Matrix is to be referred to and used to identify the likelihood and consequences of any potential risks in order to minimise them.

RISK MATRIX						
Likelihood What is the probability the risk will happen?	Consequence					
	Insignificant 1	Minor 2	Significant 3	Major 4	Severe 5	
Almost Certain 5	Medium 5	High 10	Very High 15	Extreme 20	Extreme 25	
Likely 4	Medium 4	Medium 8	High 12	Very High 16	Extreme 20	
Moderate 3	Low 3	Medium 6	Medium 9	High 12	Very High 15	
Unlikely 2	Very Low 2	Low 4	Medium 6	Medium 8	High 10	
Rare 1	Very Low 1	Very Low 2	Low 3	Medium 4	Medium 5	
Consequence:	Insignificant	1	Dealt with by in house first aid			
	Minor	2	Treated by medical professionals, hospital out patients			
	Significant	3	Significant non permanent injury overnight hospital stay			
	Major	4	Extensive permanent injury, e.g. Loss of fingers, extended hospital stay			
	Severe	5	Death, permanent disability injury, e.g. Loss of hand, quadriplegia			
Likelihood:	Almost Certain	5	Almost certain to occur in most circumstances			
	Likely	4	Likely to occur frequently			
	Moderate	3	Possibly and likely to occur at sometime			
	Unlikely	2	Unlikely to occur but could happen			
	Severe	1	May occur but only in rare circumstances			
<b>Corrective Action Timelines:</b>						
Extreme	Stop immediately		Corrective actions must be in place before recommencing. Advise CEO immediately.			
Very High	Active management		CEO and/or Head of Department to act to reduce risk exposure.			
High	Active monitoring		Head of department to monitor corrective actions are in put on place in a timely manner.			
Medium	Active monitoring		Head of department to schedule corrective action plan and review.			
Low	Reactive response		Deal with events as they arise and put steps in place to minimise future risk.			
Very Low	Reactive response		Deal with events as they arise and assess annually.			

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## 7.10. Online Environments

Technological platforms within organisations provide valuable tools in education, communication and help seeking.

Risks associated with these platforms are minimised through all necessary means, including:

- Education (including children and young people, parents, staff, and other workers) about expectations of online behaviour,
- Use of secure online platforms, and
- Communication protocols.

## 7.11. Emergency Procedures

Note: Where teaching is taking place within a registered school, the CnG EHT/Trainer will follow the emergency procedures of that school.

This section explains what is to be done to be prepared for emergencies in all CnG teaching locations, including:

- Having certain emergency equipment:
  - First aid kit, checked regularly,
  - A mobile first aid kit to take on excursions,
  - First Aid Manual,
  - A telephone in working condition (landline or mobile),
  - Smoke detectors, operational and checked regularly,
  - Fire extinguishers, serviced yearly,
  - Building to comply with any building or fire code or bylaw.

- Having an emergency evacuation plan;
  - Documented procedures of what to do if a fire alarm sounds,
    - Evacuation diagram showing emergency assembly point/s,
    - Have nominated wardens to assist children and staff to evacuate,
    - Conduct fire drills at least once per year, preferably twice per year,
    - A nominated person to bring the first aid kit and any medications,
    - Bring parent/emergency contact numbers,
    - Bring student attendance sheet and list of other workers on site,
    - Do a final sweep of the building to make sure everyone is out,
    - Call the fire department or emergency services,
    - Conduct a role call at assembly point,
    - Plan on how occupants are able to get to the assembly point (dependent upon location of fire/emergency situation),
    - Plan on how to send children home safely after an emergency,
    - After drills, relevant stakeholders to meet and discuss outcomes to identify areas for improvement,
    - Maintain records of all emergency situations, drills and their outcomes.
- Practicing fire drills regularly:
  - Staff trained to use fire extinguishers,
  - Staff attend regular fire drills.
- Following certain procedures if a child is injured:
  - Ensure that any child who is injured gets medical attention as soon as possible,
  - Ensure that parents and the CEO are informed of an injured child as soon as possible.
- Keeping an up-to-date list of emergency numbers which includes contact details of:
  - The parent/guardians of each child, including address,
  - The EHT/Trainer,
  - The nearest public health care professional,
  - The nearest hospital emergency and poison information centre,
  - Ambulance,
  - Local Fire Department,
  - Police.
- Complete a WHS Incident Report (available on CnG intranet).
- In cases of a serious (notifiable) incident, WorkSafe Qld or SafeWork SA must be notified. Refer the list provided by each authority. (Links provided in **Section 4** above.)

When taking children on an excursion, we follow the emergency procedures of that location.

## 7.12. Compliance Statements (SA Only)

As CnG provides services to children and young people, we are required to lodge a child safe environments compliance statement with the [Department of Human Services](#). All compliance statements (including our procedures) are reviewed by the Child Safe Environments (CSE) Team. New compliance statements are to be lodged each time CnG policy(ies) are reviewed and updated.

Organisations have a maximum of 6 months from the original lodgement date to finalise their lodgement. This gives organisations time to develop policies or respond to feedback on reviewed policies provided by the CSE Team.

Feedback on policies and procedures may be provided by CSE to assist us to continually improve how we meet minimum legislative requirements.

**Section 4** contains links to the relevant online information and lodgement process.

## 7.13. Reporting Child Protection, Disclosures and Suspicions of Harm

CnG EHTs, trainers and other workers are required to respond effectively when issues of child safety and wellbeing or cultural safety arise. We are committed to providing a supportive and safe environment for any person who disclose harm or risk to children and young people.

### 7.13.1. Managing Breaches & Responding to Reports of Harm

Breaches are defined in **Section 4** of this procedure.

Breaches are to be reported as follows:

- When a student presents at class in a condition which arises suspicions of harm – CnG staff to report to the CnG contact officer, confidentiality is to be maintained at all times.
- When there is an observation of a student being harmed by a CnG EHT or other worker – the CnG observer is to report to Head of Teaching, Learning and Professional Development, if unavailable then report directly to the CEO.
- Reports are also to be recorded in a WHS incident report which is automated to go to the compliance team and will be handled in a very confidential manner and any required additional corrective actions, including outcomes can be followed up.

Breaches are to be managed in a fair, unbiased, compassionate, confidential, and supportive manner to minimise any likely harm to the extent we reasonably can.

Consequences vary according to the seriousness of the breach.

List of breach classifications (not limited to) and their corresponding consequences:

Types of breaches	Classification of breach	Consequences of breach	Actions required by CnG
<ul style="list-style-type: none"> <li>• Physical gestures</li> <li>• Threatening comments</li> <li>• Failing to update Blue Card</li> </ul>	Minor	<ul style="list-style-type: none"> <li>• Direct discussion with Trainer /supervisor</li> <li>• Record of incident noted</li> </ul>	<ul style="list-style-type: none"> <li>• Provide further education / training</li> <li>• Mediating between those involved</li> <li>• Providing closer supervision</li> <li>• Restorative justice conversation</li> </ul>
<ul style="list-style-type: none"> <li>• Swearing</li> <li>• Using derogatory terms, sexual jokes, and innuendo</li> <li>• Verbal assault</li> </ul>	Moderate	<ul style="list-style-type: none"> <li>• Direct discussion with Trainer /supervisor</li> <li>• Record of incident noted</li> </ul>	<ul style="list-style-type: none"> <li>• Acknowledge behaviour inconsistent with RMS</li> <li>• Remind all parties of RMS, emphasise code of conduct</li> <li>• Provide a formal warning</li> <li>• Provide further / refresher training</li> <li>• Focus on positive ways of working with children</li> </ul>



		<ul style="list-style-type: none"> <li>Line manager informed</li> </ul>	
<ul style="list-style-type: none"> <li>Inappropriate text or social media contact with student/s</li> <li>Use of photography and/or contact information without student/parent/carer consent</li> <li>Inappropriate contact with student outside of teaching location</li> <li>Stealing</li> <li>Put a student at risk of harm</li> </ul>	Major	<ul style="list-style-type: none"> <li>Referred to CEO /GM</li> <li>Formal warning and interview</li> </ul>	<ul style="list-style-type: none"> <li>Police and relevant authorities notified</li> <li>Disciplinary procedures</li> <li>Reviewing current policies and procedures</li> <li>Interview with GM and</li> </ul>
<ul style="list-style-type: none"> <li>Staff using excessive force</li> <li>Touching students inappropriately</li> <li>Bullying, harassment, discrimination, intimidation</li> <li>Breaches of student's privacy</li> <li>Exposing students to sexual acts or pornography</li> </ul>	Extreme	<ul style="list-style-type: none"> <li>Referred to CEO / GM</li> <li>Formal Warning and disciplinary sanctions</li> </ul>	<ul style="list-style-type: none"> <li>Police and relevant authorities notified</li> <li>Documenting the details of the incident ASAP</li> <li>Complete a CnG internal incident report (on CnG intranet)</li> <li>Provide support to all parties involved</li> <li>Consider disciplinary action</li> <li>Reminding all CnG staff of our Code of Conduct and the responsibilities of their role</li> </ul>

Confidentially, must be maintained always to protect the privacy of children, young people and other persons.

### Responding to Reports (Disclosures) of Harm

A disclosure of harm occurs when someone, including a child, tells you about harm that has happened, is happening, or is likely to happen to a child.

Disclosures of harm may start with:

- ‘I think I saw...’
- ‘Somebody told me that...’
- ‘Just think you should know...’
- ‘I’m not sure what I want you to do, but...’

It is important to act quickly and in the best interests of the child or young person after a disclosure of harm is received, irrespective of the alleged source of harm.

When receiving a report (disclosure) of harm:

- Remain calm and listen attentively, actively, and non-judgementally.
- Ensure there is a private place to talk.
- Encourage the person to talk in their own words and ensure just enough open-ended questions are asked to act protectively. Don’t ask leading questions which tend to suggest an answer. Ensure the person is advised that the disclosure cannot remain a secret and it is necessary to tell someone in order to get help.
- Reassure the person they have done the right thing by telling you.

- Advise the student that you need to tell someone else who can help the child.
- Document the disclosure clearly and accurately. Including a detailed description of:
  - The relevant dates, times, locations and who was present.
  - Exactly what the person disclosing said, using “I said,” “they said,” statements.
  - The questions you asked.
  - Any comments you made.
  - Your actions following the disclosure.
- Not attempt to investigate or mediate an outcome.
- Follow any relevant internal reporting process and whether there are requirements to report matters to the state Police Service or Child Safety.

### **Responding to Suspicions of Harm (or other concern for a child’s welfare)**

In relation to a ‘suspicion’ of harm, you may, for example, advise your staff that they should:

- Remain alert to any warning signs or indicators.
- Pay close attention to changes in the child’s behaviour, ideas, feelings, and the words they use.
- Make written notes of observations in a non-judgemental and accurate manner.
- Assure a child that they can come to talk when they need to and listen to them and believe them when they do.
- Follow any relevant internal process for reporting a suspicion of harm and consider whether there are requirements to report matters to the State Police Service or Child Safety, or consider what support services could be offered to the family if the concern does not meet the relevant threshold to make a report.

A ***Details of Disclosure or Suspicion of Harm Form*** must be completed.

Types of disclosures or suspicions of harm which ***must be reported to State Police Service***:

- where there is reasonable suspicion that a child has suffered, is suffering, or is at unacceptable risk of suffering significant harm caused by physical or sexual abuse AND does not have a parent able and willing to protect the child from harm,
- where a child is at imminent risk of harm, or
- where a child has been the victim of a criminal offence.

How to deem if there is a parent willing and able to protect the child:

- A parent may be willing to protect a child, but not have the capacity to do so and therefore they are not considered ‘able’. This may include parents who are suffering from a severe mental health condition or physical illness/injury.
- A parent may have the capacity to protect a child (i.e. they may be able), but may choose not to do so (i.e. they are not willing). This may include a parent continuing a relationship with a person who is sexually abusing their child.
- If there is considered to be at least one parent both ‘able’ and ‘willing’ to protect the child, the child is considered to not be in ‘need of protection’.

Information which **must be provided to Child Safety** – a written report about a ‘reportable suspicion’ must contain the following details:

- the basis on which the person has formed the reportable suspicion, and
- the information prescribed by regulation, to the extent of the person’s knowledge.

**Consider whether referral is required to other support services, including Family and Child Connect**

If the circumstance does not warrant reporting to state Police Service and/or Child Safety, but there are still concerns for the student's welfare, consider what support services could be offered to the family.

- Family and Child Connect service can provide information and advice about connecting families with support services.
- Kids Helping on 1800 55 1800.
- Aboriginal and Torres Strait Islander Family Wellbeing Services.
- Legal Aid and other legal services.

**Contact officer**

A contact officer is a person who can deal with child protection issues and act as a point of contact should anyone wish to raise concerns.

The contact officer for CnG is Head of Teaching, Learning and Professional Development (HOTLPD). If this person is unavailable, then report directly to CnG CEO.

### 7.13.2. Conduct of Staff and Students

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

### 7.13.3. Reporting Sexual Abuse

If a staff member becomes aware, or reasonably suspects in the course of their employment at CnG, that any of their students has been sexually abused by another person, then the staff member must give a written report about the abuse or suspected abuse to the Head of Teaching, Learning and Professional Development (HoTLPD) immediately, if unavailable then to advise directly to CEO.

The Head of Teaching, Learning and Professional Development (or CEO) must immediately give a copy of the report to a police officer.

A report under this section must include the following particulars:-

- a) The name of the person giving the report (the first person),
- b) The student's name and sex,
- c) Details of the basis for the first person becoming aware, or reasonably suspecting, that the student has been sexually abused by another person,
- d) Details of the abuse or suspected abuse,
- e) Any of the following information of which the first person is aware:-
  - i. The student's age,
  - ii. The identity of the person who has abused, or is suspected to have abused, the student,
  - iii. The identity of anyone else who may have information about the abuse or suspected abuse.

A report must be made if a staff member is of the belief that an offence may have occurred, and this applies to every adult in the community over the age of 18 years. All staff are required by legislation to report information that causes the adult to believe on reasonable grounds, or ought reasonably to cause the adult to believe, that a child sexual offence is being, or has been committed, against a child by another adult.

- A child under the age of 16 years, or;
- 16 or 17 years of age with an impairment of the mind.

**Failure to Protect** - applies to an *'prescribed person'* (i.e. an adult 18 years or over who is associated with an institution, other than a regulated volunteer).

Under the failure to protect offence, an *'prescribed person'* will be liable where the person:

- Knows there is a substantial risk that another adult (who is associated with an institution or is a regulated volunteer) will commit a child sex offence; and
- Has the power or responsibility to reduce or remove the risk; and
- Wilfully or negligently fails to reduce or remove the risk.

The failure to protect offence will apply to a child that is under the care, supervision or control of an institution and the child is either:

- Under 16 years, or
- 16 or 17 years of age with an impairment of the mind.

**Note for SA:** The requirement to report to police created by this offence is a different obligation to reporting a child at risk of harm of sexual abuse to Department for Child Protection using the Child Abuse Report Line (CARL), which still needs to occur. The requirement is focused on reporting the actions of a suspected offender. It includes any suspicion you may have about behaviour outside the workplace and outside of work hours. You do not need to know the identity of the child or young person.

It is a defence to the charge of failing to report if you believe on reasonable grounds that the matter has already been reported to police or has been reported as a mandatory notification under the *Children and Young People (Safety) Act*. However, the department requires that you always report to police when you know or suspect that another employee is engaging or is likely to engage in the sexual abuse of a child.

A prescribed person is guilty of an offence if:

- they know there is a substantial risk that another person, who is also an employee of the department, will engage in the sexual abuse of a child, and
- the prescribed person has the power or responsibility to reduce or remove that risk but negligently fails to do so.

The department has an expectation that a prescribed person who knows there is a substantial risk that another employee will engage in the sexual abuse of a child, will take all action they can (commensurate with their role and responsibility) to reduce or remove the risk.

## 7.14. Communication and Support

### Communication

This procedure is communicated to all new employees and other workers of CnG to ensure they are aware of their responsibilities and understand what is acceptable behaviour for interacting with children, enable people to feel comfortable addressing issues of concern, highlight the importance of our commitment to protecting the safety and wellbeing of children participating in our programs and reduce the likelihood of breaches of our RMS.

Strategies for communicating information regarding our RMS may include, but not limited to:

- Compulsory employment induction,
- Deliver regular information sessions for people involved with CnG,
- Staff updates / meetings,
- Parent information,
- Strategies encouraging participation of children,
- Newsletters,
- Document Release Advices,
- Noticeboards / posters,
- Provide as part of resources provided internally and externally,
- Mandatory training for staff and other workers,
- Professional development and performance plans,
- Professional development days,
- CnG Website,
- CnG Intranet,
- Provide information for blue card holders.

### **Support**

CnG provide support to people dealing with issues such as behaviour management, stress, conflict, bullying, child protection concerns, breaches of the CnG RMS and dealing with disclosures or suspicions of harm.

Support is provided through our HR department and/or our Teaching, Learning and Professional Development department. If necessary, an external party may be engaged to provide suitable support via employee assistance programs, depending upon the circumstances. CnG will provide or facilitate required support services to all people involved in our organisation.

Methods may include:

- Appointing internal support service officers or workplace health and safety officers.
- Partnering with external support and counselling services.
- Implementing mentoring programs using mentors which are either internal or external to your organisation.
- Mediation or other alternative conflict resolution techniques.
- Coaching.
- Providing additional training.

## **7.15. Complaints and Investigations**

CnG policies and procedures demonstrate regard for fairness to all parties to a complaint or investigation including support and information as appropriate.

CnG ensure all staff and other workers have a good knowledge of the different ways children and young people express concerns or distress and disclose harm.

### **Concerns and complaints**

Information about all complaints and concerns, including breaches of relevant policies, procedures or the above Code of Conduct, is recorded and analysed, including in relation to processes, timeframes and record keeping practices. Systemic issues are identified and mitigated through this process.

Whilst attending a program in a CnG teaching location, students should raise any concern with the CnG EHT if they are feeling unsafe. If the complaint relates to an EHT, they should raise the complaint to their school teacher. If a student is attending a CnG program within a school teaching location, concerns are to be raised with their school teacher.

Timely feedback is provided to children and young people, families, staff and other workers who raise concerns or complaints. This includes reporting back on incidents, concerns and complaints.

CnG reviews all complaints to identify any potential areas for improvement in our child safe practices.

**Investigation process**

All investigations must be conducted in a professional and confidential manner.

How an investigation is conducted and who conducts the investigation depends upon the circumstances of the incident or report of incident.

Matters which are required to be reported to the State Police or Child Safety – we wholly cooperate with and rely upon the external authority’s investigation.

Matters of less severity are investigated by our Head of Teaching, Learning and Professional Development or his nominated person.

**8. Details of Review and Versions**

In developing our RMS we have consulted directly with children and young people to whom our organisation provides a service to, to establish a holistic and accurate view of our needs required to effectively manage any risks of harm to our students. We have also included consultation with internal stakeholders.

New versions are communicated to all stakeholders.

<b>Date</b>	<b>Version</b>	<b>Name</b>	<b>Details of review / update</b>
7 DEC 23	1.00	M Ratray	Initial Version