



SUNSHINE COAST
GRAMMAR SCHOOL

Child Safe Program

Procedures for Responding to and Reporting Harm, or Allegations of Harm (to Students Under 18 years)

Sunshine Coast Grammar School has zero tolerance for child abuse and harm and is committed to the protection of all children from all forms of child abuse and harm.

The School has developed a **Child Safety Code of Conduct** that outlines the expected standards of behaviour for all stakeholders interacting with children and young people in our School environments, including staff and students, and the consequences of failing to meet the School's expectations. The Child Safety Code of Conduct is published on our public website.

What is Child Abuse or Harm to a Child?

For the purposes of this policy, the phrase "child abuse or harm" refers to "child abuse", "harm", "grooming", exposure to "domestic abuse" and "conversion therapy".

"Child abuse" is not a defined term in Queensland legislation. However, various sources of legislation provide definitions of concepts and conduct which, together, provide guidance as to what constitutes child abuse in Queensland.

The Child Protection Act 1999 (Qld) states that "harm" to a child is "any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing". It does not matter how the harm is caused – but the Child Protection Act says that harm can be caused by physical, psychological or emotional abuse, neglect, sexual abuse or exploitation. Harm can also be caused by a single act, omission or circumstance or a series or combination of acts, omissions or circumstances.

- “Sexual abuse” is defined in the Education (General Provisions) Act 2006 (Qld).
- “Grooming” is defined in the Criminal Code Act 1899 (Qld).
- A child can be exposed to “domestic abuse” which is defined in the Domestic and Family Violence Protection Act 2012 (Qld).
- Chapter 5B of the Public Health Act 2005 (Qld) prohibits conversion therapy, which is a practice that attempts to change or suppress a person’s sexual orientation or gender identity.

In practice, child abuse or harm do not occur in isolation.

Unfortunately, the nature of child abuse and harm is complex. Abuse or harm may occur over time and potential indicators of abuse or harm are often difficult to detect. The perpetrator may be a parent, carer, other family member, staff member, Volunteer, Contractor, another adult or even another child.

Child Protection and Safety Concerns

In addition to child abuse or harm, this policy applies to breaches of our Child Safety Code of Conduct as well as other inappropriate behaviour towards or in the presence of a child, including inappropriate conduct by staff members, Volunteers, Contractors, visitors, parents/carers and other students.

For the purposes of this policy, we refer to incidents, complaints, disclosures, allegations or suspicions of child abuse, harm, breaches of our Child Safety Code of Conduct and other inappropriate behaviour towards or in the presence of a child as “child protection and safety concerns”.

Policies and Procedures for Handling Child Protection and Safety Concerns

How to Report Child Protection and Safety Concerns

Sunshine Coast Grammar School will take appropriate, prompt action in response to all child protection and safety concerns that are reported to the School, including by reporting the matter to Child Safety Services or the Police, depending on the allegation or disclosure made.

Communications will otherwise be treated confidentially on a 'need to know basis'.

Students

Our **Child Protection Contact Officers** are appointed specifically as staff members to whom students can report child protection and safety concerns, including concerns about the conduct of another staff member that the student considers is inappropriate.

However, there are no limits on how or to whom students at the school can disclose child protection and safety concerns or make a complaint about a staff member. Students can report child protection and safety concerns to any staff member.

Parents/Carers, Family Members and Other Community Members

Anyone, including External Education Providers, parents/carers and other community members can report child protection and safety concerns, including concerns about the conduct of staff members, to one of our **Child Protection Contact Officers**.

Staff, Volunteers and Contractors

For the purposes of this policy, all Staff, Volunteers and Contractors are together referred to as Staff or staff members.

Staff members **must** report any and all child protection and safety concerns involving our students to the School. They can do this by contacting a Child Protection Contact Officer, or – if the matter involves the conduct of a staff member – the Principal or PMSA CEO.

Staff members must also follow our procedures for responding to incidents or disclosures of child abuse or harm, or suspected child abuse or harm, including by making any required reports to external agencies.

These policies and procedures make clear that reporting internally to or consulting with Child Protection Contact Officer does not change any obligation under legislation to report to an external authority.

How the School will Respond to Harm, or Allegations of Harm, to Students Aged under 18 years

Sunshine Coast Grammar School will take appropriate, prompt action in response to all child protection and safety concerns, including allegations or disclosures of child abuse or harm, that are reported internally to the School, including by:

- all matters that meet the required relevant thresholds being reported externally to Child Safety Services, the Police or the Queensland College of Teachers, depending on the issues raised
- the School fully cooperating with any resulting investigation by an external agency
- protecting any student connected to the child protection and safety concern until it is resolved and providing ongoing support to those affected
- securing and retaining records of the child protection and safety concern and the School's response to it.

Child protection and safety concerns that involve the conduct of a current or former staff member and that are raised by a student, parent/carer or family or community member will be addressed in accordance with this policy together with any relevant guidelines set out in our **Complaints Handling Policy**, regardless of how that concern was raised. These policies are available on our public website.

Legal Obligations to Respond to and Report Child Abuse and Harm

There are a number of legal obligations that Sunshine Coast Grammar School and its Staff must follow when responding to child protection and safety concerns. These are summarised below.

The legal obligations for reporting child protection and safety concerns to external agencies can vary depending on the circumstances of the incident or concern.

Mandatory Reporting of Sexual Abuse to Police

Under sections 366 and 366A of the Education (General Provisions) Act 2006 (Qld), all Sunshine Coast Grammar School staff who, in the course of their employment, become aware or reasonably suspect that a:

- student under 18 years attending the School;

- child registered in the Grammar Early Learning program at the Sunshine Coast Grammar Early Learning Centre;
- person with a disability who, under section 420(2), is being provided with special education at Sunshine Coast Grammar School and is not enrolled in the preparatory year at the School,

has been or is likely to be sexually abused, must immediately give a written report about that abuse or suspected abuse to the Principal or the PMSA CEO.

The Principal or the PMSA CEO must then immediately give this written report to the Police.

If it is the Principal who themselves forms such a suspicion they must:

- immediately give a written report about the suspicion to the Police
- immediately give the written report to the CEO of the Presbyterian Methodist Schools Association.

Mandatory Reporting of a Reportable Suspicion

Under section 13E of the Child Protection Act 1999 (Qld) people who are Mandatory Reporters are required by law to report a “reportable suspicion” about a child, that is formed in the course of their professional work, to Child Safety Services.

A “reportable suspicion” about a child has two parts. It is a reasonable suspicion that the child:

- has suffered, is suffering, or is at an unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and
- may not have a parent able and willing to protect the child from the harm.

All teachers and registered nurses at Sunshine Coast Grammar School are Mandatory Reporters, and must report reportable suspicions formed in the course of their professional work at or for the School to Child Safety Services.

Optional Reporting of Harm

Any person, including a teacher or registered nurse whose concerns do not rise to the level of a reportable suspicion, may make a report under section 13A of the Child Protection Act 1999 (Qld) to

Child Safety Services if they have a reasonable suspicion that a child may be, or if no preventative support is given is likely to become, “in need of protection”.

A child may be “in need of protection” if the child:

- has suffered, is suffering or is at unacceptable risk of suffering significant harm; and
- may not have a parent able and willing to protect the child from the harm.

Child Protection or Safety Concerns About or Involving Staff

Sunshine Coast Grammar School has developed specific guidelines for reporting and responding to child protection or safety concerns that are made against, or involve, PMSA Board Members, the Principal, staff members, Volunteers, Third Party Contractors or External Education Providers – collectively called “staff members” for the purpose of these guidelines.

Any allegation of inappropriate behaviour or reportable conduct against staff members must be immediately reported to the Principal or a Child Protection Contact Officer.

If the allegation involves the Principal, reports must be made to a Child Protection Contact Officer. Verbal reports must be followed by a written report.

If a staff member becomes aware of any allegation against themselves of inappropriate behaviour towards a student, they must report the matter to the Principal without delay.

Reportable conduct for the purposes of these guidelines includes conduct by a staff member that has the potential to cause harm to students. This includes:

- **physical boundary violations:** where a staff member fails to respect and respond appropriately to the physical needs of students, for example using force to ensure that a child cooperates or holding or restraining a child
- **emotional boundary violations:** where a staff member fails to respect the emotional needs and wellbeing of students
- **behaviour boundary violations:** where a staff member fails to comply with Sunshine Coast Grammar School’s Child Safety Code of Conduct, Staff and Student Professional Boundaries policy, and Behavioural Guidelines.

Depending on the nature of the allegation, the Principal or a Child Protection Contact Officer may be legally obliged to report the matter to either Child Safety Services or the Police, take any other action or make any other external reports.

Conduct that is Reportable to the Queensland College of Teachers

The Education (Queensland College of Teachers) Act 2005 (Qld) requires Sunshine Coast Grammar School to notify the Queensland College of Teachers (QCT) as soon as practicable after:

- starting to deal with an allegation of harm or likely harm to a child due to a teacher's conduct
- stopping dealing with the allegation and the outcome of dealing with the allegation.

The School is also required to notify the QCT within 14 days of the dismissal of a teacher in circumstances that call into question the teacher's competence to be employed to teach.

Complaints Procedure for Non-Compliance with Student Protection Processes

At Sunshine Coast Grammar School, we are committed to ensuring that all staff comply with their responsibilities as detailed in our Procedures for Responding to and Reporting Harm, or Allegations of Harm.

We have developed an open and responsive complaints procedure to address any allegations of non-compliance with our Student Protection Processes.

Our Complaints Procedure for Non-Compliance with Student Protection Processes is available [here](#).

Any person may lodge a [Non-Compliance with Sunshine Coast Grammar School Student Protection Processes – Complaint Form](#) following the processes described in the procedure, where they believe that a staff member has not complied with the Student Protection Processes.