

Preamble

St Mary's College, Ipswich is committed to high quality learning and teaching for the students enrolled at our school. We recognise that this is best achieved when young people feel safe and respected. We recognise that the protection of children is everyone's responsibility.

Our Child and Youth Risk Management Strategy (CYRMS) complies with the legal requirements of the *Working with Children (Risk Management and Screening) Act 2000* and the *Working with Children (Risk Management and Screening) Regulation 2020*. The CYRMS also adheres to the National Principles for Child Safe Organisations and the Catholic National Safeguarding Standards.

As a school within the Catholic Archdiocese of Brisbane we honour the Safeguarding Commitment of the Catholic Archdiocese of Brisbane. At this school, our commitment to the safety of students is founded within our belief in Christ. Our school tradition, the Mercy charism, is embedded within the CYRMS so it is a living practice for our students and families.

Our school's CYRMS references Brisbane Catholic Education (BCE) system wide policies and procedures which support the safety, protection and well-being of students and is contextualised to our school environment. For further information regarding St Mary's College's CYRMS please contact the Assistant Principal – Student Wellbeing.

The CYRMS has been developed in consultation with the students and families at St Mary's College.

If a copy of any of the documents referred to below is required in another language or form for accessibility to a student or parent/carer, please contact the College Principal.

PART 1 – COMMITMENT, POLICIES AND PROCEDURES

This section relates to the school's statement of commitment, policies and procedures for employees and volunteers and other personnel, that demonstrate our commitment to risk management for children and young people. The following outlines what St Mary's College has in place to meet the CYRMS mandatory requirements 1,2, 3 and 6 and aligns with the Catholic National Safeguarding Standards 1, 5 and 10.

1.1 Statement of Commitment

- i. Our school's commitment statement is a natural extension of the Archbishop of Brisbane's Safeguarding Commitment Statement for the Archdiocese.

- ii. St Mary's College is committed to the safety and wellbeing of all students. St Mary's College respects and values the dignity, self-esteem, and integrity of every young person, based on our Christian belief that every person is made in the image of God and children are entrusted to us by the love of God. All students have the right to expect that the school will always act to protect them from any kind of harm.

St Mary's College is actively committed to fostering communities of safeguarding that recognise and uphold the dignity and rights of all children. We encourage open communication whereby families and communities are informed of relevant issues and participate in decisions about the safety of children.

It is particularly important to us to look for avenues to empower our students to have a say and be listened to. We actively seek to become and remain informed of the causes and signs of child abuse and neglect. When we receive information about concerns or witness any matter relating to the abuse of a child, we respond appropriately and report any such concerns to the appropriate authority. This includes contacting the police immediately where there may be immediate risk of harm to any person, especially a child.

Every person within St Mary's College who comes into contact or works with children seeks to uphold the dignity of all children and young people and commits to establishing safe and supportive relationships. St Mary's College has documented policies and procedures to prevent risks to children and build a strong culture of safeguarding. All staff and volunteers are expected to follow these policies and procedures and contribute to the culture of care and protection of all children.

We plan, organise, and review all activities with children, proactively considering potential risks and strive to ensure risks are reduced, and eliminated where possible. Everyone is encouraged to communicate any area of concern or where they think our approach may need improvement.

Anyone who brings forward a suspicion, concern, knowledge, or allegation of current or past abuse of a child to St Mary's College, will be responded to sensitively, respectfully, actively and in a timely manner, in line with our Student Protection processes. We regularly undertake internal and external auditing of our safeguarding policies and practices to make sure that they always support a culture and practice that puts the safety of children at the centre of our thinking and action. We listen to the voices of children as we constantly strive to remain vigilant and make improvements. For more information or to raise a concern, please contact: Assistant Principal – Student Wellbeing on 07 34325444 or admincentre@stmarys.qld.edu.au.

1.2 Codes of Conduct and Policies

- i. BCE's codes of conduct, for employees, students, volunteers, and other personnel (including parents/carers, clergy, religious and certain contractors), provides direction on the requirements and expectations on how those persons are to conduct themselves in any activities associated with St Mary's College. This includes particular provisions on what is acceptable or unacceptable behaviour when interacting with students. These Code of Conducts reflect the principle that child protection is everyone's responsibility.
- ii. The College also follows other BCE policies and procedures that support the Code of Conduct and are relevant to student safety.
- iii. Employees who work at St Mary's College are also bound to comply with BCE's Statement of Principles for Employment in Catholic Schools or the Statement of Principles for Employment in Catholic Education. Certain employees must also comply with other professional standards, for example, the Australian Professional Standards for Teachers and the Australian Professional Standards for Principals which describe effective, contemporary practice for teachers and principals.
- iv. The key documents are set out below.

1.2.1 BCE Employee Code of Conduct

- i. The Catholic Education Archdiocese of Brisbane Code of Conduct (Code of Conduct) sets out the standard of behaviour required of all employees of BCE in the performance of their duties at St Mary's College. All BCE employees must comply with this Code of Conduct, including employees employed on a temporary, casual, fixed term or continuing basis.
- ii. This Code of Conduct gives particular attention to the requirement for those employees to always act appropriately and professionally in their interactions with students and observe appropriate physical, emotional and online boundaries with children. It further sets out employees' duties in relation to risk management and duty of care obligations to students.
- iii. The Code of Conduct is accessible on BCE's Public Website and Intranet, Spire. The Principal at St Mary's College is required to monitor completion of the Code of Conduct training for school employees. For new employees at the school this occurs at the time of induction and for all other employees this takes the form of annual ongoing training.

1.2.2 Student Behaviour Support Policy

- iv. St Mary's College has developed a Student Behaviour Support Plan for the school, known as St Mary's College Student Behaviour Support Plan in consultation with all groups in the school community and in accordance with BCE's Student Behaviour Support policy and procedure. The Student Behaviour Support Plan is based upon a whole school positive behaviour for learning approach to support student behaviour in the school environment.
- v. St Mary's College uses Positive Behaviour for Learning (PB4L) – a framework for creating positive, safe and supportive school climates where students can grow and learn. Our school community works together to establish expected safe behaviours and teach them to all students. The framework includes practices that aim to support a student to correct inappropriate or harmful behaviours towards other students, staff, other persons or the school environment. It also celebrates students achieving and demonstrating positive behaviours and safe behaviours.
- vi. St Mary's College's Student Behaviour Support Plan reflects the shared values and expectations of the school regarding student behaviour support and encourages a supportive and safe Catholic school environment for all. The Student Behaviour Support Plan includes a student code of behaviour and information on formal sanctions and prevention and responding to bullying and harassment, guided by BCE's Student Behaviour Support policy and procedure. The Student Behaviour Support Plan is readily accessible to students and parents and is uploaded on the St Mary's College's Website. [Click here for this document](#)
- vii. Our school uses BCE's Engage Student Support System to track the behaviour of students and proactively support students' behaviour through data-based decision making. Our school is required to use the Engage Student Support System to document bullying/harassment incidents, alcohol and other drug related incidents, weapons incidents and all suspensions (both in school and out) for a period of one day or more. Schools are required to note a part time suspension on the student's school file.

1.2.3 Volunteer and Other Personnel Code of Conduct and Registration

- i. All volunteers and other personnel must complete and sign a Volunteer and Other Personnel Register form. The form requires these persons to declare if they are unable to work with children due to any disqualification, suspension or other restriction in regard to their Blue Card as set out in the Working with Children (Risk Management and Screening) Act 2000.
- ii. BCE has a Volunteer and Other Personnel Code of Conduct which outlines the standard of behaviour, which is required of volunteers and other personnel, (including parents/carers, clergy, religious and certain contractors). This code of conduct includes the need for volunteers and other personnel to think and act safely and to treat students, employees, and other volunteers with respect.

- iii. St Mary's College takes the following actions to ensure that the BCE Volunteer and Other Personnel Code of Conduct is implemented in the school community:
- all volunteers and other personnel are able to access a copy of the Volunteer and Other Personnel Code of Conduct on BCE's public website
 - all volunteers and other personnel are required to comply with the Volunteer and Other Personnel Code of Conduct to continue their voluntary/professional engagement at the school
 - all volunteers and other personnel have completed Student Protection and Code of Conduct Training for Volunteers and Other Personnel via the online training module Volunteers/Other Personnel Training located on the BCE public website.

PART 2 - CAPABILITY

This section relates to procedures for recruiting, selecting, training and managing employees that enhance the safety and wellbeing of children and young people and the protection of children and young people from harm. It also outlines arrangements for the registering and management of volunteers and other personnel in our school.

The following outlines what St Mary's College has in place to demonstrate how it satisfies the CYRMS mandatory requirement 3 and aligns with Catholic National Safeguarding Standards 5 and 10.

2.1 Recruitment, selection and management of employees.

- i. St Mary's College adheres to the requirements of BCE's policies and procedures in relation to employment which are contained in 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 and Regulation 2017, and the Education (Queensland College of Teachers) Act 2005 when engaging employees. The BCE policies and procedures regarding recruitment and selection of employees also adheres to the Catholic National Safeguarding Standard number 5.
- ii. St Mary's College recruits and selects employees who work with students in the school who are appropriately qualified and suitable for working with children and young people.
- iii. St Mary's College is responsible for employee recruitment, selection, training and management of employees in the school in partnership with personnel from the BCE office.
- iv. Principals and employees involved in staff recruitment, selection, training and management of employees at the school comply with the relevant BCE policies which are published on the BCE Intranet, Spire and include:
 - Recruitment, Selection and Appointment of Teachers procedure

- Recruitment, Selection and Appointment of Brisbane Catholic Education Office Staff
 - Recruitment, Selection and Appointment of Middle Leaders
 - Recruitment, Selection and Appointment of Primary Learning Leaders
 - Recruitment, Selection and Appointment of Specialist positions – Guidance Counsellors, Speech Pathologists
 - Recruitment, Selection and Appointment (Acting Senior Leadership Positions in Schools)
 - Recruitment, Selection and Appointment of P – 12 Heads
 - Recruitment, Selection and Appointment of DPs, APs and APREs
 - Recruitment, Selection and Appointment of Principals.
- v. In advertising new positions for the school, the advertisement states that “This position involves working with children. The appointment of a successful applicant will be subject to satisfactory employment screening for child related employment in accordance with the law”. It is also subject of positive assessment by robust reference checks and targeted interview questions in respect of child safe practices as relevant to the position.
- vi. Screening is taken seriously which includes (before commencing work or duties at a school):
- All non-teaching employees working at St Mary’s College are required to comply with the BCE Working with Children Check (Blue Card Screening) Procedure.
 - All non-teaching employees, volunteers and trainee students who work with students and who require a Working with Children Card (Positive Notice blue card) under the Working with Children (Risk Management and Screening) Act 2000, are required to obtain a Working with Children Card (Positive Notice blue card) and keep it current.
 - All teachers must produce evidence of current teacher registration with the Queensland College of Teachers (QCT) before they commence work at St Mary’s College.

2.2 Training of Employees

- 2.2.1 The Principal is required by BCE to ensure that all new BCE employees at St Mary’s College are provided with induction training on the school’s processes and procedures, the values and expectations of BCE and the standard of behaviour required of employees in their interactions with students. This induction training is aimed at supporting BCE and St Mary’s College to provide an environment that is safe and supportive for students. The training provided includes, but is not limited to:
- i. All staff at St Mary’s College must complete annual mandatory online and face to face training in BCE’s Student Protection Processes. This training covers BCE’s requirements under the Student Protection Processes in relation to reporting by employees of risk of harm to students, or suspicions or allegations, involving sexual abuse/likely sexual abuse, physical abuse, emotional abuse or neglect, as well as other inappropriate behaviour of staff, volunteers and other personnel towards

students. New employees must complete this training prior to commencing work with students at the school.

- ii. In addition, mandatory induction training is provided for the school's newly appointed Student Protection Contacts, and refresher (every 2 years) and advanced skills (every 4 years), to upskill the Student Protection Contacts in receiving and managing disclosures of harm/abuse from students.
- iii. Privacy and Data Breach Awareness training undertaken by all employees annually as part of a suite of core compliance courses.

2.2.2 Further development of employees to Enhance Student Wellbeing and Safety

- i. BCE has available policies, processes, and resources to support the pastoral care and wellbeing of students at St Mary's College. These are readily accessible to BCE employees on BCE's Intranet, Spire. The Principal at St Mary's College provides informal training, from time to time, at staff meetings and 'in service' days, so that employees at the school are aware of these policies.

Example policies and processes include:

- Student Wellbeing policy
- Student Diversity and Inclusion policy
- School Uniform policy
- Pastoral Care and Student Wellbeing Position and statements
- Students in out-of-homecare (OHCC)
- Natural Disasters
- Critical Incidents
- Catholic Perspectives across the Curriculum
- Preventing and Responding to Student Bullying and Harassment policy and procedure
- Alcohol and other Drug related incidents procedure
- Exclusion procedure
- Detention procedure
- Suspension procedure
- Negotiated change of school procedure
- Physical Interventions procedure
- Police Interventions in Schools procedure
- Weapons in Schools procedure
- Manual Handling of Students procedure
- Suicide Intervention Prevention and
- Managing Non-suicidal self-injury in students' procedure
- Students with Disability
- Student Attendance policy and procedure
- Management of actual or perceived aggression (MAPA)
- Positive Behaviour for Learning (PB4L)
- Social Media policy
- Student Behaviour Support policy and procedures
- Template for the School Behaviour Support plan
- Guidelines for informed consent for guidance counsellors
- GC Management of Confidential Information procedure

- Engage Strategy
 - Transitions – career development P-12
 - Youth Support Coordinator Initiative (YSCI)
 - Students with disability processes, guidelines, and resources
 - Guidelines and support plan for students who are gender diverse.
- ii. BCE has a Student Wellbeing Team which supports St Mary’s College in the pastoral care and wellbeing of students at the school and develops strategies, policies, and procedures to assist the school and students. St Mary’s College employs School Guidance Counsellors to work with students, parents and employees and provide pastoral care, personal safety strategies, support for marginalised students and support for students who may be at risk of being harmed.
 - iii. BCE has a number of university partnerships which may provide additional psychological services to students and their families together with professional learning for employees regarding a Catholic perspective on relationships and sexuality education.

2.3 Management of Employees

- i. The Principal of St Mary’s College is responsible for the management of an employee’s behaviour in the first instance and with the support of BCE when appropriate. This includes recognising behaviour and work practices that champion student safety and respect as well as responding promptly to any behaviours or practices that do not support student safety or is, or likely to be, harmful or abusive to a student. The process for the managing or employee’s includes annual appraisals, goal setting, recognition and awards, performance enhancement and management, complaint management and disciplinary procedures when relevant.
- ii. Where there is a complaint or allegation in relation to an employee of inappropriate behaviour unsatisfactory performance or misconduct involving a student, the Principal will follow the Staff Complaints Management procedure and Staff Misconduct procedure that sets out a clear and consistent process for handling complaints and allegations of misconduct involving employee behaviour towards or with a student.
- iii. BCE provides the Lifeworks program which offers free and confidential counselling to employees at the school who require support.
- iv. BCE promotes the capacity of employees to contribute to the mission of our organisation through ongoing professional development and professional learning. The BCE Performance and Development policy, and the Planning and Performance Framework, guide individual performance and development which is undertaken at all levels throughout the organisation. The Leadership Capability Framework articulates the requirements for BCE employees to model and promote a culture where student protection is the responsibility of everyone.

2.4 Managing volunteers and other personnel, engaged by the school to provide a service to students, eg: parent or other volunteers, clergy, religious and certain contractors.

- i. In the life of school activities, it is common for volunteers, parents, carers, clergy, religious, guest speakers and individual contractors such as swim instruction, music or dance teachers, to support the education of students by the school engaging such persons in school activities with students. Consistent with PART 1 of this CYRMS St Mary's College ensures such persons are appropriately screened, trained, supervised and supported to carry out those roles safely with students and all involved.
- ii. To ensure these opportunities and activities are a safe and positive experience for students and all involved the Principal is responsible for ensuring that the requirements under 1.2.3 above in this strategy document are adhered to. This includes ensuring the relevant persons have access, and adhere to, the Volunteer and Other Personnel Code of Conduct, receive induction training and relevant screening requirements are completed.
- iii. The Principal is further responsible for ensuring that the necessary directions and support are provided to volunteers and other personnel so they may carry out their role. This includes ensuring they are aware that they are expected to report any concerns about student safety or abuse/harm under the Volunteer and Other Personnel Code of Conduct and they know who to report this to.
- iv. BCE has developed a Contractor Induction Manual to give contractors information on BCE's Workplace Health and Safety Contractor Management System at BCE schools, so that contractors working at St Mary's College play their role in maintaining a safe environment for students.
- v. The Principal is responsible for responding to any concerns, allegations or complaints arising from the behaviour of a volunteer or other personnel and reporting any such behaviour, if required, to BCE and/or relevant external authorities.
- vi. The student's safety is a paramount concern when responding to a concern, allegation or complaint involving a student.
- vii. If a concern/allegation/complaint involves a person from an external organisation, (such as a member of clergy, a religious, an agency contractor), the Principal and BCE will engage with the relevant authority for that person, for example the relevant leader of a Catholic Diocese or Religious Congregation, the Head of another faith entity or a Director of a camp or retreat centre.

PART 3 – CONCERNS, DISCLOSURES OR SUSPICIONS OF HARM

This part relates to policies and procedures for how the school responds to disclosures, concerns or suspicions of harm to a student. The following outlines the strategies St Mary's College has in place to meet the CYRMS mandatory requirements and aligns with the Catholic National Safeguarding Standards 2, 5,6 and 10.

3.1 Student Protection Processes

- i. BCE's [Student Protection Processes](#) provide a process for all employees who work at St Mary's College to recognise, respond and report allegations or suspicions of:
 - sexual abuse/likely sexual abuse of students.
 - harm or risk of harm to students caused by physical abuse, sexual abuse, emotional abuse, or neglect; and
 - inappropriate behaviour of staff towards students.
- ii. Employees are also informed that it is a crime:
 - for certain people not to protect a child from a known risk of sexual offending; and/or
 - to fail to report sexual offending against a child in the absence of a reasonable excuse.
- iii. Training in relation to how these laws apply in our school and the procedures for responding to any such matter are provided to all employees as set out above in this document.
- iv. The Student Protection Processes have been developed in accordance with the requirements of the *Education (Accreditation of Non-State Schools) Act and Regulation 2017*, the *Education (General Provisions) Act 2006 and Regulation 2017*, the *Working with Children (Risk Management and Screening) Act 2000 and Working with Children (Risk Management and Screening) Regulation 2020*, the *Child Protection Act 1999* and the *Education (Queensland College of Teachers) Act 2005*. The *Student Protection Processes and Guidelines Catholic Education Archdiocese of Brisbane* document is reviewed and republished in keeping with the Queensland Catholic Education Commission template that was developed in collaboration with BCE and other Catholic employing authorities. The BCE processes are approved by the Non-State Schools Accreditation Board.
- v. The Student Protection Processes are also underpinned by the Brisbane Catholic Education *Student Protection Policy (2020)*. The Student Protection Processes satisfy relevant requirements under the *National Catholic Safeguarding Standards*. In 2021 the review of the Student Protection Processes included the addition of relevant information regarding failure to protect and failure to report provisions of the Criminal Code Act 1899. A dedicated training module as well as updates to the annual student protection training module were implemented.

3.2 School Student Protection Contacts

- i. In accordance with the *Education (Accreditation of Non-State Schools) Regulation 2017*, St Mary's College has five (7) stated staff members to whom a student can report behaviour of another staff member that the student considers is inappropriate. They are known as Student Protection Contacts.

- ii. The Principal (Paula Goodwin) is a Student Protection Contact at the school. The other Student Protection Contacts are staff members at the school:
 - Donna Sugars
 - Katherine Palmer
 - Deanna Tessier
 - Fiona Podolak
 - Megan Christie
 - Matthew Kirby

These nominated persons may be contacted through the school office. The role of the Student Protection Contact is to receive complaints and allegations from staff and students and to make or assist staff to make all reports as outlined in BCE's Student Protection Processes. The identity of the St Mary's College Student Protection Contacts is made known to employees, students, volunteers, and parents by publishing their details on the school's website and for example in school newsletters, on posters in the school and at parent information nights.
- iii. Information about the Student Protection Contacts and requirements for their appointment is detailed within the BCE's Student Protection Processes.

3.3 Employee Relations and Student Protection Team

- i. BCE's Employee Relations and Student Protection Team are a support resource for our school and have expertise in the field of risk assessment and risk management, child protection and staff professional standards.
- ii. The Advisors and Officers of the Employee Relations and Student Protection Team:
 - Assist our school base employees to identify whether there is a reasonable suspicion of abuse, harm and/or staff other inappropriate behaviour towards a student.
 - Offer support and guidance during and after a matter involving student protection and/or staff inappropriate behaviour.
 - Assist our school base employees to appropriately report or refer families to Department of Child Safety or other service providers, and
 - Develop and facilitate professional learning for our school-based employees.

3.4 Supports

The school has available supports, if required, for students, families, and staff if they are impacted upon by a disclosure or suspicion of harm. It may be appropriate that such supports are provided through the school or BCE resources, or external supports may be required.

3.5 Reporting

- i. The Code of Conduct for Employees has been updated, and school employees have received ongoing training, to reinforce that the protection of students and reporting of concerns/allegations is everyone's responsibility.
- ii. On receipt of a disclosure or suspicion of harm to a student an assessment is made as to whether a State Authority Report is required. If such a report is required, the following will occur:

- Reports are made to the Department of Children, Youth Justice and Multicultural Affairs for harm/risk of harm to a student caused by sexual abuse, physical abuse, emotional abuse or neglect where a parent is not able and willing to act protectively
 - Reports are made to the Queensland Police Service in relation to allegations or reasonable suspicions of sexual abuse/likely sexual abuse of a student.
 - Reports required under the *Criminal Code Act 1899* which are not made under mandatory reporting obligations are made to the Queensland Police Service. A dedicated form has been developed to assist adults to meet their responsibility to report a child sexual offence.
- iii. If a disclosure or suspicion of harm relates to inappropriate behaviour of a paid employee, a volunteer or other personnel, at the school towards a student, the matter will be managed by the Principal, with support from BCE's Employee Relations and Student Protection Team, as appropriate in respect to the school environment.
- iv. The school provides training for employees on how to respond to disclosures and suspicion of harm. This includes:
- All school-based employees must complete annual mandatory Student Protection Training. The Principal ensures that all employees are compliant with this training.
 - All school-based volunteers and other personnel are informed of how to raise a concern if they hear about, or receive any information in any other form, that may involve a disclosure or suspicion of harm to a student. Further, they are required to complete the Student Protection and Code of Conduct Training for Volunteers and Other Personnel (also refer to section 1.2.3 above).

3.6 Accessibility of Information

The school ensures information is accessible to students, parents, employees, and volunteers and other personnel, to inform them on how to raise a concern, allegation or complaint involving the safety of a student. This includes:

- i. The Student Protection Processes are readily available for employees, parents, students and carers and St Mary's College has the link to the Student Protection Processes on our school website. Our school has a local school-based flowchart to ensure all employees understand how a student protection concern is to be communicated and managed in accordance with the Student Protection Processes.
- ii. BCE has processes to enable employees at St Mary's College to document and report student protection concerns and inappropriate behaviour of staff member, volunteer or other personnel towards a student. This is achieved through the Brisbane Catholic Education Student Case Management System (SPCMS). This SPCMS also facilitates electronic submission of State Authority Reports to the relevant state authority.
- iii. BCE has a complaints procedure to enable parents or students at St Mary's College to make a complaint that the school has not complied with the Student Protection Processes. Parents or students may make a complaint via the Record of Complaint about Non-Compliance with BCE's Student Protection Processes located on BCE's public website. BCE and Principals are required to handle these complaints in

accordance with BCE's Procedure for Handling Complaints about Non-Compliance with BCE's Student Protection Processes.

3.7 Review of Policy Breaches

BCE undertakes a system review for serious breaches of policy, including to identify any system improvement to policy, procedure or training and address any additional training requirements for individuals.

PART 4. – RISK MANAGEMENT

This part relates to how St Mary's College identifies and manages risks to students through risk management plans and responds to any breach of those plans or the CYRMS. This demonstrates the school's strategies to meet the mandatory CYRMS requirements 5 and 7 and aligns with the Catholic National Safeguarding Standards as 1, 5, 6 and 10.

4.1 Regular Strategies to Minimise Risks of Harm

- i. Our school undertakes regular risk assessments and management strategies as part of our daily education program during school days and activities. In this regard we apply the Australian standards for risk assessments and our risk assessments are supported by relevant BCE Policy and Procedures. Further information about the risk assessments is available through the school principal.
- ii. The record of each risk assessment and risk management plan undertaken are kept at the school so they may be properly followed, and are subject of internal BCE checks, and available for Blue Card Services to review/audit if requested.
- iii. The school's regular risk assessments include, but not limited to, the following activities:
 - Adequate supervision of students
 - Supervision arrangements
 - Playground supervision
 - Drop Off and collection of children
 - Procedure followed in the event a child is not collected
 - Procedure to be followed in the event a person responsible for the collection of a child is deemed unable (for example, intoxication)
 - Emergency and critical incidents
 - Fire/Lockdown incidents
 - Engaging with and managing Visitors/Outsiders
 - Use of Media/Communications
 - Use of Computer/Internet
 - Guidance Counselling Services
 - Transport of students by staff
 - Transporting of students by students
 - Injuries, allergies, or illnesses

St Mary's College takes seriously its commitment in relation to the safety and protection of students. BCE has developed policies and procedures to manage risks of harm to students, which our school complies with, for example:

Supervision – St Mary’s College manages the supervision of students appropriately to ensure that there is adequate supervision of students. St Mary’s College follows the BCE information on supervision of student’s procedure and has appropriate supervision ratios to ensure the safety of students and prevent unsupervised access to children.

Supervision Arrangements – Supervision arrangements are in place to ensure the safety of all students.

Formal hours of supervision are from 8:15 am until 3:15pm. Should students arrive at school before formal supervision begins, they should remain on school grounds in a designated supervision area (Rose Garden) until supervision begins. Students who remain after duty times are requested to wait in the Rose Garden, iCentre or at the front gate for collection.

Before school, from 8:15am to 8:35am, the areas above are supervised by two staff members: one to each of the following areas:

- Supervision F covers areas A, C and E
- Supervision G covers areas B and D
- Supervision MG covers the front gate

Playground Supervision – The playground supervision roster has been carefully constructed to ensure that suitable spaces are designated for students. Appropriate staff are allocated to supervise each space. Responsibilities associated with playground supervision are communicated to relevant staff.

During break 1 and break 2, areas of supervision include the following:

- M-Block (Area A)
- Rose Garden Gazebos (Area B)
- Tuckshop area (Area C)
- EW Area (Area D)
- Catherine’s Corner top tables (Area E)
- iCentre

During breaks, one staff member is allocated to each of these areas. Supervision rosters are as follows:

- 1st break (40 min): 10.45am - 11.25am

Supervision 1a – 10:45am – 11:05am

Supervision 1b – 11:05am – 11:25am

- 2nd break (20 min): 1:25 – 1:45pm

Supervision 2a – 1:25pm – 1:45pm

One staff member is assigned to each of the following designated after school supervision areas from 2:45pm until 3:15pm:

- Arthur St Bus Stop
- Tim Maloney Oval Bus Stop
- St Mary’s Church Bus stop

Students are advised of all out of bounds areas during Induction processes in their Pastoral Class at the beginning of the school year, during Year Level Meetings and on assembly at the start of the year. Staff remind students of out of bounds areas when on duty or if observing someone who is out of bounds. A student who is found to be in an out of bounds area is spoken to by the staff member on duty and repeated incidents are recorded in Engage. Students and staff are reminded of out of bounds areas throughout the school year, in PC, Year Level Meetings, and general assemblies should the need arise.

As students move between classes staff are vigilant. Should a student arrive late to class repeatedly then the student is spoken to by the teacher and repeated lateness is recorded in Engage. If a student leaves the class at any time (e.g., bathroom break, in school appointment etc) they are required to have their Handbook signed by their classroom teacher so their whereabouts is always known. If a student leaves a classroom to attend sick bay, the classroom teacher will ring the Student Desk to inform the school officer that they are on their way there.

Supervision for excursions, activities, or clubs (with start times before school, start/finish times after school, occurring during breaks and the duration of the activity) is to be provided by the teacher/teachers/staff organising and/or assigned to the activity. Should there be a conflict of availability for the supervisor the Deputy Principal is to be notified so that appropriate supervision is able to be arranged or if needed – cancelled/postponed.

Formal duty supervision rosters are reviewed each term and published to all school staff on SharePoint in Student Lists. Staff are provided with the link to this document. In the case of wet weather, staff on duty and students are directed to the areas below by the Deputy or Assistant Principal (this may occur during class time or during the break over the PA system):

- McAuley Centre (Area A and D)
- M and O-blocks (Area B)
- Tuckshop and behind O-Block (Area C)
- Front of EW and JG blocks (Area E)

Drop Off and Collection of Children - There is a parent drop off and collection zone in the street outside the College gates where students are dropped in the morning and collected after school. Reception is open after school until 3:30pm for students to report to should they not be collected. Teacher supervision is provided from 8:15am until 3.15pm in the designated areas outlined above. Students are expected to follow road safety rules in crossing the road and staff (wearing high vis vests to ensure visibility) manage bus pick up. Drivers of all vehicles around the College are expected to follow all general road rules. Busses have clear parking bays which are marked with their bus number for ease of student identification and movement.

Procedure Followed in the Event a Child is Not Collected – When a child is not collected at the end of the school day or after an event/activity, contact is made with the parent or another emergency contact to organise collection. A staff member remains at school until all students have been collected. Should a student not be collected by a reasonable time, contact will be made with the appropriate agencies (police, child safety). Throughout this process the student is reassured that all is being done to contact caregivers, and that they (the student) are safe. Follow up would occur the next day by an appropriate staff member based upon the situation that has occurred (this may be the Deputy Principal, Assistant Principal- Student Wellbeing or the Pastoral Leader).

Procedure to be Followed in the Event a Person Responsible for the Collection of a Child is Deemed Unable (for example, intoxication) – Children are not released to a

person who is deemed unable to provide responsible care. An alternative emergency contact would be asked to collect the child in this situation.

Emergency – St Mary’s College ensures that all employees are briefed to appropriately handle emergency situations and critical incidents in accordance with BCE’s Procedures for Responding to Critical Incidents. Incidents will be assessed as per the impact level, and as required, a Critical Incident Management Team may be formed. Principal and CLT will direct and communicate with the College and BCE in these events. This will likely include all staff e-mails and phone communication, depending on the incident. Should a lockdown or evacuation be required, these relevant processes will be enacted. After the incident, a post incident review and debrief will be conducted.

Fire/Lockdown – St Mary’s College ensures that all employees and volunteers are made aware of fire evacuation and lockdown procedures at the school. The College evacuation and lockdown procedures are available on the staff SharePoint area and also provided to new staff as per their WHS induction. For an evacuation, the main assembly point is the bottom oval, with a Personal Evacuation Emergency Plan (PEEP) evacuation point at the school gates on Mary St. Should the bottom oval be unavailable, the Primary School oval (Timothy Malony) is used. The Principal acts as Chief Warden, assisted by the Business Manager as Deputy and CLT and senior staff fulfilling leading roles in addition to a team of Wardens. Practice evacuations are held at least twice annually. Regarding lockdowns, students and staff are to immediately secure themselves in an area that is as out-of-sight as possible and lock doors and windows. Communication is over email and is managed by the lockdown response team which consists of the Principal and other CLT. Lockdown drills are conducted twice annually. Regular reviews are undertaken for both fire/emergency evacuation and lockdowns which include whole of staff consultation, CLT deliberation and implementation by the St Mary’s College WHS chair (Business Manager) and WHS Officer.

Visitors/Outsiders – St Mary’s College manages visitors to school premises to ensure the safety of staff, students and visitors, including relevant signage and directions, together with procedures for signing in and out of the school in accordance with the BCE Visitors to School Premises Procedure. Visitors and contractors sign in using the electronic visitor management system at Reception where the Business Manager and WHS Officer are located to ensure the proper contractor management and inductions have taken place. Upon leaving, both visitors and contractors sign out at Reception. Visitors (not contractors) to the College are always accompanied by staff while contractors are provided a contractor induction so that they may work independently. Contractors must be in uniform to be identified. If a visitor to the site is unwelcome or intruding, CLT are to be consulted if possible and if the person cannot be removed from site cooperatively and safely, a lockdown may be engaged.

Media/Communications strategies – St Mary’s College obtains the permission of parents (using the Consent Form, All Forms of Media and Communications) for the use of student photographs and names in any materials issued to the public in printed or electronic form. Identifying information of students is not used in promotional material without the specific permission of the parents and the students concerned. St Mary’s College obtains the specific informed consent of parents for any publication of names and photos of students in the media outside the local school. The categories for media consent includes *limited* which limits consent to the school community and *none* which does not allow any identifying information for that student in any media.

Computer/Internet - All employees and students at St Mary’s College are required to observe the Brisbane Catholic Education Email, Internet, and Intranet Acceptable Use

Statement. St Mary's College implements the BCE Acceptable Use of Computer and Internet Resource Consent Form in the school. The school staff adhere to BCE's Social Media Policy.

Guidance Counselling Service – The Guidance Counsellor at St Mary's College must obtain Informed Consent from a parent and/or student for participation in any guidance counselling services offered.

Transport of students by staff - Transport by staff will require the prior approval of the Principal and the written permission of the parents. Principal approval will necessitate risk management involving, for example, an assessment of driver capability, confirmation of current driver's licence, insurance, road worthiness of vehicle, distance involved, any conflict with formal supervisory role for the teacher, gender mix and number of people travelling etc. This list is not exhaustive just indicative. Depending upon the proposed journey, there may be other contextual factors to consider. Transport in emergency circumstances may be acceptable, however, an attempt should be made to obtain the verbal consent of the principal and/or parent. Schools must adhere to the BCE Transport of Student Procedure.

Transport of Students by Students - BCE requires BCE schools with secondary students to develop a policy regarding student motor vehicle drivers and passengers in accordance with BCE's Student Drivers Procedure. St Mary's College observes the following in relation to student drivers and potential passengers:

1. St Mary's College is not responsible for students whose parents allow them to drive to school or to be passengers in cars driven by other students.

2. All students who drive to and from school, school activities, and events must have submitted a completed "Driving to school permission form", available from the Student Services Office and on the College portal. This form requires the following information:

- Student name, Year level, House and PC
- Make, model, colour, registration number of vehicle
- Parent/Guardian permission (signature) and contact number
- Student signature

The form outlines the student's responsibility to follow all Queensland Road safety rules and school safety rules, including appropriate parking in local streets. There is no parking available to students on College property, including the areas between St Mary's College and St Edmund's College and Staff parking areas. Students are also asked not to park in Arthur Street or at the top of Mary Street, between the Colleges.

3. Any students who will be passengers in another student's vehicle (including a sibling) must be listed on the form and have their parents' permission and signature. By agreeing for this to occur, both sets of parents/guardians enter this arrangement with the clear understanding that no liability attaches to the College.

The following information is to be included in the appropriate forms:

- Student passenger name, Year level, House and PC
- Passenger's parent/guardian permission (signature) and contact number
- Drivers parent permission signature regarding transportation of this student
- Student passenger signature

4. Once students arrive at the College, they are not permitted to leave the College grounds before the end of the school day.
5. Students are not permitted to drive to and from sport venues and school activities during school hours.
6. Any request for an exception to these regulations must be in writing and signed by a parent. Any request will be approved at the discretion of the Principal or member of the CLT.
7. Public transport, College vehicles (buses) or hire bus will always be available to all students for school activities.
8. Claims arising out of accident or injury in a private vehicle would be dependent upon the owner's insurance and on the application of common law principles.

Bathrooms and Toilets

St Mary's College has implemented the following strategies:

- a. Students and staff received clear guidelines in relation to student use of bathrooms and toilets.
- b. Guidelines and directions ensure the privacy of children and young people while allowing for appropriate supervision, e.g., announcing entry to the room and avoiding being alone with a child in these locations.
- c. The BCE Code of Conduct for employees provides direction on this area and employees are informed of these provisions.
- d. Parents and carers are informed of the guidelines through the College Newsletter.

Devices used to take photos of students.

St Mary's College has implemented the following strategies:

- a. The BCE Code of Conduct reinforces how staff are to manage how and when photos are taken of students and the use of devices and social media regarding student photos.
- b. Images of students may only be taken on College devices (no private devices or phones). Where possible the College Marketing Officer should be organised to take images. If staff need to take images of students, it should occur under the direction of the Principal and should be removed immediately when they are downloaded to One Drive or other such College storage area.
- c. In line with BCE policy, the Principal has provided a direction to staff that they are not to use personal devices for taking photos of students unless authorised by the Principal and the photo must be removed from the personal device onto the school device as soon as practical. These procedures are communicated to parents and carers
- iv. Confidential management of student information - School employees are required to handle private and confidential information in relation to students and

- parents/guardians in accordance with the BCE Privacy Policy and BCE Code of Conduct.
- v. Online safety training is completed by students studying Industrial Design Technology and Hospitality. This safety training assists teachers to ensure that students receive consistent safety training for the use of high-risk equipment in these curriculum areas.
 - vi. Curriculum Activity Risk Management procedures
Curriculum Activity Risk Management procedures (CARA) have been developed to identify risks associated with the delivery of specific teaching activities including Visual Arts safety, Food Technology safety, ITD safety and Science safety. Further information on such procedures is available by contacting the Principal
 - vii. Alternative Education Provision (AEP) - To ensure a safe school environment when managing interruptions to on site learning, for example during the COVID 19 pandemic, the St Mary's College will implement government and BCE guidelines and resources. In such situations the school based Critical Incident Management Team will implement local: protocols, for example but not limited to -modification to arrangements for school drop off and pick up or playground usage, home based learning and adjustments to assemblies, liturgies, school excursions. Microsoft Teams are established as the platform used to facilitate AEP, including home based learning, and to build collaboration and connection providing alternative facilitation of liturgies, staff meetings, assemblies and school tours

4.2 A risk management plan for high-risk activities and special events

- i. When undertaking a more high-risk activity or special event (for example a fete, overnight camp/retreat), our school identifies any specific potential risks relevant to that activity in the risk assessment undertaken and considers mitigating strategies for the safety and wellbeing of students and the risk of harm to students. This is documented in the risk management plan for each high-risk activity and secured at the school.
- ii. St Mary's College refers to information in relation to risk assessments for various activities and risk assessment tools provided on BCE's Intranet, Spire.
- iii. Information about the risk assessments for high-risk activities are accessible by contacting the Principal.
- iv. The Health and Safety Team at BCE provides support to our school, if requested, to help us carry out risk assessments and develop and implement a risk management plan. In addition, a dedicated Workplace Health and Safety Officer ("WHSO") is employed at St Mary's College (who is required to complete a Certificate 4 in Workplace Health and Safety within 12 months of commencing the role). The WHSO's role is to co-ordinate risk assessments at our school and support the Principal in carrying out the health and safety responsibilities under legislation. BCE provides training and updates to the WHSO.
- v. In developing a high-risk strategy/plan St Mary's College takes into consideration the context of the activity or event including:

- the nature of the activity and the objectives in conducting it
 - the environment or location of the activity
 - the stakeholders involved in the activity including children and young people
 - identify the specific risks and identify the control measures that are already in place and whether additional controls are required.
- vi. If relevant, the following issues are also considered:
- Transportation
 - Toileting/change room procedures
 - Ensuring appropriate supervision of children and ratios of adults to children
 - Ensuring appropriate supervision of volunteers
 - A media consent process in relation to photographs
 - Managing medications and allergies
 - Managing illness/injury
 - Emergency/lockdown procedures
 - Relevant consent forms, including emergency contact details
 - Procedures or processes applying to visitors
 - Any risks presented by the physical environment
 - Accommodation and supervision requirements.
- vii. The school's risk assessments for high-risk activities are kept at the school so they may be properly followed and are subject of internal BCE checks and available for Blue Card Services to review/audit if requested.

4.2.1 Risk Management for Excursions and Community activities as high-risk activities:

- i. The Principal is responsible for approving all excursions and community events. Key elements include:
- The Principal has reference to BCE forms and fact sheets to assist in identifying, assessing and managing risks associated with excursions, for example, the Excursion Safety Procedure, and Excursion and Incursion Risk Assessment Guideline, an OH & S Fact Sheet: Excursions, OH & S Standard - Risk Management Form and the Risk Assessment Template Form.
 - The Principal completes the Risk Assessment Template Form prior to each excursion. This form specifies that in carrying out a risk assessment, student protection risks must be assessed and managed.
 - The Principal utilises BCE's International Travel procedures to assist in planning for the safety of students participating in international travel.
 - The Principal completes the BCE Fete Safety Planning prior to a fete taking place. This Fete Safety Planning Checklist assists the Principal in managing the health and safety risks of conducting a fete.
 - The Principal accesses links to relevant information provided on BCE's Health and Safety Portal, to assist in the risk assessment and management process, including the Fireworks Checklist, Mobile Amusement Device Checklist, Contractors Workplace Health and Safety Agreement and information on the hygienic handling of food.
 - The Principal uses a Contractor Agreement – School Fete which among other things warrants that all the contractor's personnel and approved subcontractors who interact with children and young people at the Fete hold a current Positive Notice blue card and it has no knowledge or reason to believe that any of its personnel or approved subcontractors may have acted inappropriately towards children or young people.

4.3 A plan for managing breaches of the Child and Youth Risk Management

- i. BCE and St Mary's College both have their own CYRMS. BCE and the College take any breach of the CYRMS seriously.
- ii. BCE has a Student, Parent and Guardian Complaints Management Policy and Procedure which is accessible on the school and BCE website or by contacting the Principal. Under this process, any breach of the Strategy may be dealt with as follows:
 - if the alleged breach relates to the actions of an employee, this will be managed, as appropriate, in accordance with the BCE Staff Complaints Management procedure, the BCE Staff Misconduct procedure or Unsatisfactory Performance procedure.
 - if the alleged breach relates to a report of inappropriate behaviour of a staff member towards a student, this will be managed in accordance with the process set out in the Student Protection Processes.
 - if the breach relates to a complaint made via the Record of Complaint about Non-Compliance with BCE's Student Protection Processes, that complaint will be dealt with in accordance with the Procedure for Handling Complaints about Non-Compliance with BCE's Student Protection Processes.
 - if the breach relates to the actions of a volunteer or other personnel, it will be dealt with similarly to the procedures set out in the Student Protection Processes or complaints procedures, as appropriate; and
 - if the breach relates to the action of a contractor this will be managed in accordance with BCE's contract with the contractor.
- iii. Details regarding management of any breach, including who manages the breach, are contained in the procedures mentioned above. All records about individual concerns or incidents are kept confidentially in BCE business information systems.

PART 5 - CONSISTENCY

To support our school's safeguarding commitment and practices the school ensures consistent application of its legal requirements under Chapter 7 and 8 of the *Working with Children (Risk Management and Screening) Act 2000* This includes consistency in our management of the working with children card and ensuring we have strategies in communication and support to members of the school community. The following outlines the school's application of this CYRMS mandatory requirement 6 and aligns with the Catholic National Standards 1, 2, 3, 4 and 10.

5.1 Working with Children Card (Positive Notice blue card) Requirements and Employee and Volunteer Register

- i. St Mary's College complies with BCE's Working with Children Check (Blue Card Screening) Procedure (The Procedure) which details BCE's requirements in accordance with the *Working with Children (Risk Management and Screening) Act 2000* to ensure that required personnel hold a Working with Children Card (Positive Notice blue card).

- ii. All non-teaching employees, volunteers (unless exempt) and trainee students who work at St Mary's College with children under 18 years of age are required by our school to obtain working with children clearance and hold a Working with Children Card (Positive Notice blue card) before an offer of employment is made and prior to working with children.
- iii. The 'No Card, No Start' provisions apply to:
 - all school-based BCE employees who are not registered with either the Queensland College of Teachers or the Australian Health Practitioner Regulation Agency
 - volunteers (who are not parents of children attending the school)
 - preservice teachers undertaking practical experience as part of compulsory academic course requirements
 - self-employed people, paid employees and volunteers whose usual duties include, or are likely to include, the teaching, coaching or tutoring of a child, 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 board members (excluding current parents on a board at their own child's school).
- iv. BCE records Working with Children Card (Positive Notice blue card) information for all paid employees. St Mary's College maintains a register of all employees required to hold a Working with Children Card (Positive Notice blue card) or exemption card and is responsible for linking the employee to the school via the Blue Card Services Organisation Portal.
- v. St Mary's College maintains a register for all volunteers, including those who are exempt from holding a Working with Children Card (Positive Notice blue card). This will generally be volunteering parents of a child attending the school. Volunteers who require a Working with Children Card (Positive Notice blue card) under the *Working with Children (Risk Management and Screening) Act 2000* must obtain the Working with Children Card (Positive Notice blue card) before commencing volunteer work and need to be linked by the school via the Blue Card Services Organisation Portal.

5.2 Procedures for reviewing the CYRMS

- i. To ensure that St Mary's College CYRMS remains current and effective, this strategy is monitored and reviewed annually. Also, in the event that St Mary's College identifies concerns, particularly following an incident, St Mary's College's CYRMS will be reviewed, and any actions documented. Issues to be considered in the review may include:
 - whether BCE and school policies and procedures were followed
 - whether any incidents/concerns relating to risk management regarding children and young people occurred
 - the effectiveness of the process used to manage any incidents
 - the effectiveness of BCE's and St Mary's College's policies and procedures in preventing or minimising harm to children and young people; and

- the content and frequency of training in relation to BCE's or St Mary's College's CYRMS.
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- ii. Following the review, employees, parents and volunteers at St Mary's College are advised of any significant changes to BCE's or St Mary's College's policies and procedures as a result of the review and appropriate training will be provided.

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

- i. To ensure accessibility and supportive information/training on the CYRMS the Principal implements and communicates St Mary's College's CYRMS to employees, parents/carers, volunteers, and other personnel. This includes:
 - Placing the school's CYRMS on the school's website.
 - Providing a printed copy upon request.
 - Providing training to the school's employees on the School's CYRMS
 - Requesting volunteers and other personnel to review the CYRMS; and
 - Ensuring the mandatory training in respect of student safety as referred to in this document is adhered to.