CHILD SAFETY MANAGEMENT PLAN
CP-008

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Related College documents	CP-001 Reportable Conduct Procedure CP-002 Reportable Conduct Scheme Reporting Form CP-003 Reportable Conduct Scheme Notification Register CP-004 Student Protection Procedure CP-005 Staff Quick Reference CP-006 Child Safety and Wellbeing Policy CP-007 Reportable Conduct Scheme Governance and Delegation Statement BRD-001 to BRD-010 (Boarding series)
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Plan owner	Risk, Compliance & Assurance Manager

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1 INTRODUCTION

1.1 Purpose

This Plan is the College's strategic statement on child safety. It explains what the College is committed to, who is accountable, how the framework holds together and how the College complies with the relevant legislation.

The legislation that frames this Plan includes the *Child Safe Organisations Act 2024* (Queensland), which establishes the Ten Child Safe Standards and the Reportable Conduct Scheme; the *Working with Children Check Act 2000* (Queensland) and Regulation 2020; the *Child Protection Act 1999* (Queensland); the Education legislation; the *Criminal Code Act 1899* (Queensland); and the relevant Commonwealth instruments.

The Plan sits at the strategic tier of the College's Child Protection architecture. It does not reproduce operational detail. Operational detail sits in the procedures, forms, registers and operational frameworks referenced throughout. The Plan tells the reader what the College is committed to, how it gives effect to that commitment, who is accountable, and how the framework is reviewed.

1.2 Scope and Application

This Plan applies to:

- all students;
- all employees (full-time, part-time, permanent, fixed-term and casual);
- contractors, volunteers and trainees;
- members of the Governing Body;
- other adults engaged with the College.

The Plan applies in every setting where the College is responsible for students. That includes College sites, the boarding precinct, excursions, extracurricular activities, transport and online environments where students engage with the College.

The Plan addresses every category of risk to children and young people that the College has identified. It is not a list of incidents to be avoided. It is the framework within which the College builds and sustains a safe environment.

1.3 Status of this document and relationship to the Child Protection Series

This Plan is the strategic document at the top of the Child Protection operational series. It is approved by the Governing Body. It is reviewed annually by the Risk, Compliance & Assurance Manager in consultation with the Principal.

The Plan is supported by:

- the Child Safety and Wellbeing Policy (CP-006), which states the Board-approved policy position;
- the Reportable Conduct Procedure (CP-001), the Student Protection Procedure (CP-004) and the Reportable Conduct Scheme Governance and Delegation Statement (CP-007), which carry the procedural detail;
- the operational instruments CP-002, CP-003, CP-005 and CP-009, and the Boarding series (BRD-001 to BRD-010).

The Catholic Education Queensland Limited Revised Student Protection Processes (Circular 2026/041, April 2026) inform the College's framework as guidance material. They are not adopted as operational instruments. The College's operational documents for reportable conduct and student protection are CP-001 and CP-004 respectively.

1.4 How to read this plan

Each section addresses one piece of the framework and points to the operational documents that give it day-to-day effect. The mapping appendices summarise the cross-references in tabular form:

- Appendix A maps the Working with Children regime;
- Appendix B maps the Ten Child Safe Standards;
- Appendix C maps the Reportable Conduct Scheme;
- Appendix D maps the other reporting and child safety obligations.

Some documents referenced in this Plan are still in development as part of the College's child safety document review. References to those documents stand as architectural pointers. Each document's current status is captured in the policy and procedure register held by the Risk, Compliance & Assurance Manager.

2 LEGISLATIVE AND REGULATORY FRAMEWORK

This Plan operates within an interlocking framework of Queensland and Commonwealth legislation that governs how the College keeps children safe. The framework has expanded materially in the period leading to 01 July 2026, when the Reportable Conduct Scheme commences in Queensland. This Plan brings the College's response to that framework together in one strategic document.

2.1 Working with Children Check Act 2000 (Queensland) and Regulation 2020

The *Working with Children Check Act 2000* (Queensland) is the principal Queensland instrument governing screening and management of adults working with children. Chapters 7 and 8 establish the Blue Card framework, the screening, issuance and ongoing-monitoring regime for adults working with children.

The College complies with chapters 7 and 8 by:

- holding a Blue Card register;
- verifying status at recruitment and at prescribed intervals;
- applying the Restricted Person provisions.

The detail is at section 6.4 of this Plan.

The College's child safety controls are set out at section 6 of this Plan, mapped to the Ten Child Safe Standards and to the operational documents that give them day-to-day effect.

2.2 Child Safe Organisations Act 2024 (Queensland) and Regulation 2025

The *Child Safe Organisations Act 2024* (Queensland) is the principal new instrument in the framework. The Act:

- establishes the Ten Child Safe Standards (section 9 of the Act) and a universal principle requiring cultural safety for Aboriginal and Torres Strait Islander children (section 11(2));
- establishes the Reportable Conduct Scheme (Chapter 3 of the Act);
- provides for information sharing about reportable conduct matters between reporting entities, the Queensland Family and Child Commission and other prescribed bodies (Chapter 4);
- establishes the role of the Queensland Family and Child Commission as the administrator of the Scheme and the regulator for child-safe entity obligations.

The Ten Child Safe Standards apply to the College in full. Section 5 of this Plan addresses each Standard in turn.

The Reportable Conduct Scheme imposes specific obligations on the Principal as Head of Entity. Section 7 of this Plan addresses those obligations and cross-references the Reportable Conduct Procedure (CP-001) for operational detail.

2.3 Reportable Conduct Scheme: Commencement Wednesday 01 July 2026

The Reportable Conduct Scheme is established under the *Child Safe Organisations Act 2024* (Queensland). It is administered by the Queensland Family and Child Commission. The Scheme commences on Wednesday 01 July 2026, brought forward from the original commencement date of Friday 01 January 2027.

Under section 34, the head of the reporting entity must notify the Queensland Family and Child Commission of any reportable allegation or reportable conviction relating to a worker. Reportable conduct is defined at section 26(1) of the Act in six categories, set out at section 7.1 of this Plan.

2.4 Child Protection Act 1999 (Queensland)

The *Child Protection Act 1999* (Queensland) establishes the general child protection framework in Queensland. It is administered by the chief executive of the department administering the Act, currently the Department of Families, Seniors, Disability Services and Child Safety, operating through Child Safety Services.

Section 13E imposes mandatory reporting obligations on relevant persons. Relevant persons are teachers, doctors, registered nurses, police officers with child protection responsibilities, persons performing a child advocate function under the *Public Guardian Act 2014*, and early childhood education and care professionals. For the College, the relevant categories are teachers and registered nurses.

Section 13G protects honest reporters from civil, criminal and administrative liability.

Chapter 5A establishes the framework for information sharing between prescribed entities for child protection purposes. The College is a prescribed entity for those purposes.

2.5 Education Legislation

Sections 366 and 366A of the *Education (General Provisions) Act 2006* (Queensland) impose reporting obligations on non-state-school staff. Section 366 covers sexual abuse of a relevant person. Section 366A covers likely sexual abuse of a relevant person. Section 364 is the definitions section for Part 10 of that Act. It defines “sexual abuse” and “relevant person”, but is not itself a reporting obligation.

Sections 76 and 77 of the Education (Queensland College of Teachers) Act 2005 (Queensland) impose notification obligations on the employing authority in relation to allegations of harm caused (or likely to be caused) by a teacher’s conduct. Section 76 applies when the authority starts to deal with the allegation. Section 77 applies when it has finished.

Section 16 of the *Education (Accreditation of Non-State Schools) Regulation 2017* (Queensland) requires the College to have written student protection processes.

2.6 Criminal Code Act 1899 (Queensland): Sexual Offences, Failure to Report and Failure to Protect

The *Criminal Code Act 1899* (Queensland) establishes a number of offences relevant to the College’s child safety obligations. Sections 215 and 216 criminalise carnal knowledge with or of children and persons with an impairment of the mind. Section 229B criminalises maintaining an unlawful sexual relationship with a child. The Criminal Code also defines “position of authority” at section 207A for the purposes of certain sexual offence provisions. That definition applies to staff at the College in respect of students.

Position-of-authority offences for 16 and 17 year olds (sections 210A and 229B(1A)). From 20 September 2025, it is an offence for an adult who has a 16 or 17-year-old under their care, supervision or authority to engage in sexual activity with that young person. Consent is not a defence. Section 210A covers a sexual act with a 16 or 17 year old under the adult's care, supervision or authority (maximum penalty 14 years imprisonment for a penetrative act under section 210A(1), or 10 years imprisonment for indecent dealing under section 210A(2)).

Section 229B(1A) covers maintaining an unlawful sexual relationship with a 16 or 17 year old under the adult's care, supervision or authority (maximum penalty life imprisonment). These offences were inserted by the *Criminal Justice Legislation (Sexual Violence and Other Matters) Amendment Act 2024*.

At the College, every member of staff is in a position of care, supervision or authority over the students and boarders in their charge, including senior boarders aged 16 and 17.

Failure to report (section 229BC). Any adult who reasonably believes (or ought reasonably to believe) that a child sexual offence is being or has been committed against a child by another adult must, without reasonable excuse, disclose that information to a police officer as soon as reasonably practicable. The maximum penalty is three years imprisonment.

Failure to protect (section 229BB). An accountable person (an adult associated with an institution who is not a regulated volunteer) commits an offence if they know there is a significant risk that another adult associated with the institution, or a regulated volunteer, will commit a child sexual offence against a child under the institution’s care, supervision or control, and they wilfully or negligently fail to reduce or remove that risk. The maximum penalty is five years imprisonment.

Both offences apply to adults at the College. Section 229BC applies to every adult. Section 229BB applies to accountable persons. At the College, accountable persons include the Principal, Deputy Principal, Heads of House, Dean of Boarding and similar positions of power or responsibility.

Compliance is conduct-based. The Staff Code of Conduct, the Reportable Conduct Procedure (CP-001) and the Staff Quick Reference (CP-005) address the practical implications.

2.7 Commonwealth Obligations

Section 47C of the *Sex Discrimination Act 1984* (Commonwealth) imposes a positive duty on the College, as an employer and a person conducting a business or undertaking. The College must take reasonable and proportionate measures to eliminate, as far as possible:

- sex discrimination;
- sexual harassment;
- sex-based harassment;
- conduct that subjects a person to a workplace environment hostile on the ground of sex;
- related acts of victimisation.

The duty is supported by the Australian Human Rights Commission Guidelines for Complying with the Positive Duty under the *Sex Discrimination Act 1984* (Cth). It is given effect at the College through the Sexual Harassment Policy. The Australian Human Rights Commission has had compliance and enforcement functions from 12 December 2023.

The *Education Services for Overseas Students Act 2000* (Commonwealth) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 establish welfare and pastoral care standards for international students that overlay the Queensland framework. These obligations are addressed at section 8.8 and section 10.4 of this Plan.

3 DEFINITIONS

The following terms are used throughout this Plan. The primary statutory wording for any defined term is in the legislation cited.

Accountable person. In relation to the section 229BB failure-to-protect offence, an adult associated with an institution who is not a regulated volunteer. At the College, accountable persons include the Principal, the Deputy Principal, Heads of House, the Dean of Boarding and similar positions of power or responsibility. See section 229BB of the *Criminal Code Act 1899* (Queensland).

Blue Card framework. The screening, issuance and ongoing-monitoring regime for adults working with children, established under chapters 7 and 8 of the *Working with Children Check Act 2000* (Queensland) and administered by Blue Card Services.

Child. A person under 18 years of age. For the purposes of sections 229BB and 229BC of the *Criminal Code Act 1899* (Queensland), a person under 16 years, or a person with an impairment of the mind.

Child safe entity. Child safe entity. An entity to which Chapter 2 applies under section 10 of the *Child Safe Organisations Act 2024*. The College must implement and comply with the Child Safe Standards and the universal principle under section 11. The College is a child-safe entity.

Head of Entity. The person responsible for the reporting entity's service delivery and compliance with the Reportable Conduct Scheme. For St Patrick's College Townsville, the Head of Entity is the Principal. Where a reportable matter concerns the Principal, the Board Chair acts as the alternate Head of Entity under the Reportable Conduct Scheme Governance and Delegation Statement (CP-007).

Mandatory reporter. A relevant person required under section 13E of the *Child Protection Act 1999* (Queensland) to give a written report of significant harm or risk of significant harm to the chief executive of the department administering that Act. The relevant persons under section 13E are teachers, doctors, registered nurses, police officers with child protection responsibilities, persons performing a child advocate function under the *Public Guardian Act 2014*, and early childhood education and care professionals. For the College, the relevant categories are teachers and registered nurses.

Reportable allegation. An allegation or other information that leads a person to form a reasonable belief that a worker of a reporting entity has committed reportable conduct, or misconduct that may involve reportable conduct. It is irrelevant whether the conduct is alleged to have occurred in the course of the worker performing work for the College; section 27(2) of the Act confirms that out-of-hours conduct can engage the Scheme. See section 27 of the *Child Safe Organisations Act 2024* (Queensland).

Reportable conduct. Conduct by a worker of a reporting entity of one or more of the six categories at section 26(1) of the *Child Safe Organisations Act 2024* (Queensland), comprising the categories of conduct set out at section 7.1 of this Plan.

Reportable Conduct Scheme. The scheme established under Chapter 3 of the *Child Safe Organisations Act 2024* (Queensland), administered by the Queensland Family and Child Commission, which commences on Wednesday 01 July 2026.

Reportable conviction. A conviction of a worker of a reporting entity for an offence committed against a law of a State or the Commonwealth that may involve reportable conduct. “Conviction” includes a finding of guilt, the acceptance of a plea of guilty by a court (whether or not a conviction is recorded) and a spent conviction. See section 28 of the *Child Safe Organisations Act 2024* (Queensland).

Reporting entity. An entity that is required to report under the Reportable Conduct Scheme of the *Child Safe Organisations Act 2024* (Queensland). The College is a reporting entity within the meaning of section 29 of the Act.

Ten Child Safe Standards. The ten standards set out at section 9 of the *Child Safe Organisations Act 2024* (Queensland), reproduced in full at section 5 of this Plan.

Worker. An individual who performs work of any kind for the College. This includes an employee, volunteer, contractor or subcontractor, consultant, person supplied by a provider of labour hire services, executive officer or person concerned with the College’s management, trainee, person undertaking work experience, minister of religion, religious leader or officer of a religious body. The list is inclusive, not exhaustive. Under section 32 of the Act, “worker” extends to a former worker for the purposes of the Reportable Conduct Scheme where the alleged conduct (or conviction) relates to a period when the person was performing work for the College. See section 8 and section 32 of the Child Safe Organisations Act 2024 (Queensland).

4 GOVERNANCE AND ACCOUNTABILITY

Child safety is a shared responsibility. This section sets out the specific accountabilities of the Governing Body, the Principal, named operational roles and all other adults engaged with the College. It works together with the Reportable Conduct Scheme Governance and Delegation Statement (CP-007) and the relevant position descriptions and delegations.

4.1 Governing Body

St Patrick’s College Townsville Limited is the entity that owns and operates the College. As the reporting entity and child safe entity under the *Child Safe Organisations Act 2024* (Queensland), the Governing Body has ultimate accountability for child safety at the College.

The Governing Body’s child safety accountabilities are to:

- approve and re-authorise this Plan, the Child Safety and Wellbeing Policy (CP-006) and the Reportable Conduct Scheme Governance and Delegation Statement (CP-007);
- ensure that the College implements and complies with the Ten Child Safe Standards under the *Child Safe Organisations Act 2024* (Queensland);
- receive regular reporting from the Principal on child safety compliance, including Blue Card register status, training compliance, complaints concerning children and any reportable allegations or reportable convictions notified under the Reportable Conduct Scheme;
- ensure the Risk, Compliance & Assurance Manager and the College Leadership Team have the resources and authority to discharge their child safety responsibilities;
- maintain awareness of mandatory reporting obligations and the Reportable Conduct Scheme;
- act on the findings of any investigation into a reportable allegation involving the Principal, with the Board Chair receiving any notification that concerns the Principal directly.

4.2 Principal as Head of Entity for the Reportable Conduct Scheme

The Principal is the Head of Entity for the purposes of the Reportable Conduct Scheme. In this Plan, the term "Principal" is used as the operational reference. The term "Head of Entity" is used only where required for legal precision or statutory citation.

The Principal's child safety accountabilities are to:

- lead the College's child safety culture, including modelling expected behaviours and reinforcing the College's Commitment to Child Safety and Wellbeing in communications with students, parents/guardians, staff and the community;
- act as Head of Entity for the purposes of the Reportable Conduct Scheme, including making notifications to the Queensland Family and Child Commission, deciding on the investigator model in each case (internal or external), receiving outcomes and ensuring required follow-up action;
- ensure the College complies with mandatory reporting obligations under the *Child Protection Act 1999* (Queensland), and reporting obligations under the *Education (General Provisions) Act 2006* (Queensland) and the *Education (Queensland College of Teachers) Act 2005* (Queensland);
- appoint Student Protection Contacts and ensure they receive appropriate training and support;
- ensure recruitment, induction, training and management practices give appropriate priority to child safety;
- report regularly to the Governing Body on child safety matters;
- delegate operational responsibilities under this Plan as appropriate.

The Reportable Conduct Scheme Governance and Delegation Statement (CP-007) sets out the specific delegations. CP-007 also sets out the arrangements that apply where a notification, allegation or conviction concerns the Principal directly. Where a matter concerns the Principal, the Board Chair acts under the College's alternate Head of Entity / delegated reporting arrangement set out in CP-007.

The College's investigator model is mixed. The Principal decides whether to use an internal investigator or to engage an external investigator on a case-by-case basis. Considerations include the nature of the allegation, the complexity of the matter, real or perceived conflicts of interest and the availability of suitably qualified internal personnel.

4.3 Student Protection Officers

Student Protection Officers are members of staff appointed by the Principal to receive, support and respond to disclosures or suspicions of harm. They are the College's first internal point of contact for students and families with a child safety concern. Staff report concerns to the Principal, not to a Student Protection Contact. Student Protection Officers are appropriately trained, are issued with current contact information and are accessible to boarders, day students and parents/guardians. The College's Student Protection Officers are:

- College Principal
- Deputy Principal – Students (Day & Boarding)
- Dean of Student Wellbeing
- Indigenous Community Engagement Officer
- College Psychologists
- College Nurse

The role and responsibilities of Student Protection Officers are described in detail in the Student Protection Procedure (CP-004).

4.4 Dean of Boarding and Boarding Leadership

The Dean of Boarding leads the boarding program and is accountable for child safety in the boarding context. Boarding presents specific child safety considerations relating to:

- overnight supervision;
- personal privacy;
- residential care;
- leave and host arrangements;
- transport;

- the cultural and family circumstances of boarders, including international and Aboriginal and Torres Strait Islander boarders.

The Dean of Boarding's child safety accountabilities are to:

- ensure boarding staff are recruited, inducted and trained in line with this Plan and the Boarding series;
- maintain compliance with the Australian Boarding Schools Association standards and the College's policies;
- implement the High Risk Management Plans relevant to boarding at section 8 of this Plan;
- ensure all adults present in the boarding precinct hold a current Blue Card and are appropriately supervised;
- escalate matters to the Principal under the Reportable Conduct Procedure (CP-001) and the Student Protection Procedure (CP-004).

4.5 College Leadership Team

The College Leadership Team supports the Principal in implementing this Plan within their respective areas of responsibility. Specific child safety accountabilities of the Team are to:

- ensure staff in their areas understand and comply with this Plan, the Staff Code of Conduct and the Child Protection series;
- escalate disclosures, suspicions of harm or reportable allegations under CP-001 and CP-004;
- support the Principal in any investigation or notification under the Reportable Conduct Scheme;
- reinforce child safety expectations in performance management, recruitment and induction within their areas;
- contribute to the annual review of this Plan.

4.6 Risk, Compliance & Assurance Manager

The Risk, Compliance & Assurance Manager has day-to-day operational responsibility for child safety regulatory compliance. The Risk, Compliance & Assurance Manager:

- supports the Principal in discharging Head of Entity responsibilities under the Reportable Conduct Scheme;
- maintains the College's Blue Card register and verifies status at recruitment and at prescribed intervals;
- monitors child safety training compliance and reports to the Principal and the Governing Body;
- maintains the College's relationship with Blue Card Services, the Queensland Family and Child Commission, the Non-State Schools Accreditation Board and other regulators in respect of child safety matters;
- maintains the CP-003 Reportable Conduct Scheme Notification Register;
- coordinates the annual review of this Plan and the Child Protection series;

4.7 All Staff, Volunteers, Contractors and Third Parties

Every adult engaged with the College has child safety accountabilities. All staff, volunteers, contractors, members of the Governing Body and other adults present at College sites or representing the College off-site must:

- act in accordance with the Staff Code of Conduct;
- hold a current Blue Card and meet the requirements of the *Working with Children Check Act 2000* (Queensland);
- complete child safety induction and training in line with their role;
- report any disclosure, suspicion or concern about a child's safety under CP-001 and CP-004;
- meet mandatory reporting obligations where they apply;
- escalate matters along the reporting pathways set out in this Plan and the Child Protection series;
- support a culture in which children, young people, families and colleagues feel safe to raise concerns.

4.8 Reportable Conduct Scheme Governance and Delegation Statement

The Reportable Conduct Scheme Governance and Delegation Statement (CP-007) is the operational instrument that sets out:

- the specific delegations from the Principal as Head of Entity;
- the arrangements that apply where a matter concerns the Principal;
- the College's investigator model for Reportable Conduct Scheme matters;
- the records management requirements;

- the interface between the Reportable Conduct Scheme and the College's other reporting and investigation processes.

CP-007 is to be read together with this Plan and CP-001 Reportable Conduct Procedure.

5 IMPLEMENTING THE TEN CHILD SAFE STANDARDS

Section 9 of the Child Safe Organisations Act 2024 (Queensland) sets out the Ten Child Safe Standards that the College, as a reporting entity, must implement. Each Standard describes a feature of an organisation that is safe for children, drawing on the National Principles for Child Safe Organisations. Section 11(2) of the Act adds the universal principle requiring cultural safety for Aboriginal and Torres Strait Islander children, addressed at section 9 of this Plan.

This section addresses each Standard in turn. For each, it describes what the Standard requires, how the College gives effect to it, and which operational documents carry the day-to-day work. Operational detail does not sit in this Plan; it sits in the documents this section points to. Appendix B provides a single-page cross-reference between each Standard, the relevant section of this Plan and the supporting operational documents.

5.1 STANDARD 1: Child safety and wellbeing is embedded in organisational leadership, governance and culture

Standard 1 requires the College to embed child safety in its leadership, governance and culture. It calls for visible, sustained leadership commitment from the Governing Body and the Principal, public statements of commitment, governance structures that hold leaders accountable for child safety outcomes, and a culture in which every adult engaged with the College understands that child safety is part of their role.

The College gives effect to Standard 1 through:

- Governing Body approval and re-authorisation of this Plan, the Child Safety and Wellbeing Policy (CP-006) and the Reportable Conduct Scheme Governance and Delegation Statement (CP-007);
- the Commitment to Child Safety and Wellbeing statement at the front of this Plan;
- regular Governing Body reporting on child safety compliance, including Blue Card register status, training completion, complaints concerning children and any reportable allegations or convictions notified under the Reportable Conduct Scheme;
- the Principal's leadership as Head of Entity for the Reportable Conduct Scheme;
- the appointment of named Student Protection Officers with explicit child safety accountabilities;
- performance management practices that include child safety as a dimension of performance for staff in roles working with children.

Operational documents: Child Safety and Wellbeing Policy (CP-006), Staff Code of Conduct, Reportable Conduct Procedure (CP-001), Student Protection Procedure (CP-004).

5.2 STANDARD 2: Children are informed about their rights, participate in decisions affecting them and are taken seriously

Standard 2 requires the College to inform children of their rights, to support their participation in decisions that affect them and to take what they say seriously. It requires age-appropriate, culturally appropriate communication of children's rights, mechanisms for children to give feedback and shape decisions, and visible evidence that children's voice influences College practice.

The College gives effect to Standard 2 through:

- inclusion of children's rights in the curriculum, particularly through the Personal Development and Personal Education program;
- inclusion of children's rights and a child-friendly statement of the College's child safety commitments in the student diary and the Student Code of Conduct;
- structured forums for student voice, including Prefects, the Student Representative Council, the Boarding Council and year-level meetings, with minutes captured and used in College Leadership Team and Governing Body discussions;

- accessible feedback channels for boarders, day students, students from culturally and linguistically diverse backgrounds and Aboriginal and Torres Strait Islander students;
- pastoral care structures that support students to raise concerns with trusted adults;
- a child-focused complaints process, addressed at section 5.6 below and operationalised through the Complaints Handling Policy.

Operational documents: Student Code of Conduct, Complaints Handling Policy, Personal Development and Personal Education curriculum, pastoral care framework.

5.3 STANDARD 3: Families and communities are informed and involved in promoting child safety and wellbeing

Standard 3 requires the College to inform and involve families and communities in promoting child safety. It calls for accessible communication, mechanisms for families to give feedback, recognition that families and communities contribute to child safety, and meaningful engagement with Aboriginal and Torres Strait Islander families and communities.

The College gives effect to Standard 3 through:

- enrolment communications setting out the College's commitment to child safety, the role of parents/guardians and the available reporting and feedback channels;
- visible publication of this Plan, the Child Safety and Wellbeing Policy and the Complaints Handling Policy on the College website and through the Learning Hub;
- regular communication with parents/guardians;
- specific engagement protocols for boarder families, including remote and Aboriginal and Torres Strait Islander families;
- engagement with the Wulgurukaba and Bindal communities and with the broader Aboriginal and Torres Strait Islander community;
- mechanisms for parent/guardian feedback and complaints.

Operational documents: Communications Policy, Complaints Handling Policy, Boarding series, Reconciliation Action Plan.

5.4 STANDARD 4: Equity is upheld and diverse needs respected in policy and practice

Standard 4 requires the College to uphold equity and to take diverse needs into account. It calls for active practice to ensure that every child, regardless of background, identity, ability or circumstance, is safe, included and supported. The Standard recognises Aboriginal and Torres Strait Islander children, children with disability, children who identify as LGBTIQ+, children from culturally and linguistically diverse backgrounds and international students.

The College gives effect to Standard 4 through:

- cultural safety practices for Aboriginal and Torres Strait Islander students, addressed in detail at section 9 of this Plan and supported by the Indigenous Community Engagement Officer;
- inclusive practices for students with disability;
- visible commitments to inclusion of LGBTIQ+ students;
- specific practices for students from culturally and linguistically diverse backgrounds;
- a tailored support framework for international boarders, addressed at section 8.8 and section 10.4 of this Plan.

Operational documents: Student Code of Conduct, Respectful Relationships and Antibullying Policy, Boarding series, pastoral and inclusion frameworks, College policies on disability and inclusion.

5.5 STANDARD 5: People working with children are suitable and supported to reflect child safety and wellbeing values in practice

Standard 5 requires the College to ensure that people working with children are suitable and that they are supported in their roles. It requires safe recruitment, screening, induction, supervision, ongoing training and management practices, including procedures for managing concerns about a person's suitability.

The College gives effect to Standard 5 through:

- recruitment processes that prioritise child safety;
- Blue Card screening for all employees, contractors, volunteers, trainees and members of the Governing Body under the *Working with Children Check Act 2000* (Queensland), maintained on the Blue Card register by the Risk, Compliance & Assurance Manager;
- the Restricted Person Declaration Form for relevant prospective employees and volunteers engaging in restricted employment;
- Queensland College of Teachers registration verification for teaching staff;
- induction, ongoing professional development and supervision practices that reinforce child safety expectations;
- performance management and exit interview practices that surface child safety concerns;
- the Reportable Conduct Procedure (CP-001) and the Reportable Conduct Scheme Governance and Delegation Statement (CP-007) for managing reportable allegations and convictions concerning workers.

Operational documents: Recruitment, Selection and Induction procedures; Staff Code of Conduct; Blue Card register and procedures; CP-001; CP-007.

5.6 STANDARD 6: Processes to respond to complaints and concerns are child-focused

Standard 6 requires the College to maintain processes for complaints and concerns that are child-focused. The Standard recognises that adult complaints processes are often inaccessible to children. It requires the College to provide pathways appropriate to children's age, capacity, culture and circumstances, with specific protections for children making complaints and visible mechanisms for raising concerns.

The College gives effect to Standard 6 through:

- a Complaints Handling Policy and a Complaint and Dispute Resolution Procedure that prioritise the safety and wellbeing of children;
- multiple accessible reporting channels for children;
- specific provisions in the boarding context for boarders to raise concerns confidentially and outside the boarding leadership chain where required;
- explicit recognition that a complaint by a child or about a child's safety triggers the reporting pathways at CP-001 and CP-004 alongside the standard complaints process;
- training for staff in receiving disclosures and complaints from children;
- communication with children about the existence and use of complaints channels, in age-appropriate language;
- record-keeping and feedback to children on outcomes, where appropriate to the matter and to the child's age and circumstances.

Operational documents: Complaints Handling Policy, Complaint and Dispute Resolution Procedure, Student Protection Procedure (CP-004), Reportable Conduct Procedure (CP-001).

5.7 STANDARD 7: Staff and volunteers are equipped with the knowledge, skills and awareness to keep children safe through ongoing education and training

Standard 7 requires the College to equip staff and volunteers with the knowledge, skills and awareness to keep children safe. Training must be regular, role-specific, recorded and verified.

The College gives effect to Standard 7 through:

- annual mandatory child safety training for all employees, volunteers and contractors;
- an induction module covering this Plan, the Staff Code of Conduct, the Child Protection series, mandatory reporting and the Reportable Conduct Scheme;
- role-specific training for Student Protection Officers, the Risk, Compliance & Assurance Manager, boarding staff, College Health Centre staff, pastoral leaders and the Governing Body;
- Reportable Conduct Scheme training for the Principal, the Risk, Compliance & Assurance Manager and Student Protection Officers;

- a training register maintained by the Risk, Compliance & Assurance Manager, with completion reported regularly to the Principal and the Governing Body;
- access to training materials through the Learning Hub for revisitation between formal training events.

Operational documents: Training Framework, staff induction program, Risk, Compliance & Assurance Manager's training register.

5.8 STANDARD 8: Physical and online environments promote safety and wellbeing and minimise the opportunity for children to be harmed

Standard 8 requires the College to design and maintain physical and online environments that promote safety and minimise opportunities for harm. The Standard extends to online environments, including communication platforms, devices and the College's digital infrastructure. It requires the College to consider risk in physical layout, supervision, technology and access controls.

The College gives effect to Standard 8 through:

- design and supervision of the College's physical sites;
- specific protocols for the boarding precinct, including dormitory and bathroom layout, sleepover shift arrangements, visitor and access controls, and personal privacy provisions for boarders;
- supervision protocols for camps, excursions and overnight activities;
- the College's Acceptable Use of ICT Services Policy and Acceptable Use of Personal Devices Policy;
- communication protocols between staff and students that discourage one-on-one private digital communication;
- High Risk Management Plans for the activities and environments where elevated risk is foreseeable, at section 8 of this Plan.

Operational documents: Boarding series (in particular BRD-003 Supervision and Accommodation and BRD-005 Visitors and Access), Acceptable Use policies, Communications Policy, High Risk Management Plans at section 8 of this Plan, operational risk assessment instruments.

5.9 STANDARD 9: Implementation of the child safe standards is regularly reviewed and improved

Standard 9 requires the College to regularly review and improve its implementation of the Child Safe Standards. It calls for review of policies, practices, training and culture; consideration of the lessons of incidents and near-misses; engagement with children, families and staff in the review process; and visible evidence that review leads to change.

The College gives effect to Standard 9 through:

- annual review of this Plan and the Child Protection series, coordinated by the Risk, Compliance & Assurance Manager and re-authorised by the Governing Body where material changes are made;
- a Child Safe Standards self-assessment process;
- review of any incident, allegation or conviction notified under the Reportable Conduct Scheme;
- engagement with students, parents/guardians and staff in the review process;
- monitoring of regulatory and sector developments.

Operational documents: Risk, Compliance & Assurance Manager's review schedule, Child Safe Standards Self-Assessment process, Governing Body reporting.

5.10 STANDARD 10: Policies and procedures document how the entity is safe for children

Standard 10 requires the College to maintain policies and procedures that document how it is safe for children. Documented policies provide accountability, consistency and evidence of compliance. They must be accessible, current and put into practice.

The College gives effect to Standard 10 through:

- this Plan as the strategic instrument;
- the Child Safety and Wellbeing Policy (CP-006) as the Board-approved governing policy;
- the Child Protection series (CP-001 to CP-007) as the operational policy and procedure tier;

- the Boarding series (BRD-001 to BRD-010) as the policy and procedure tier for the boarding context;
- the Staff Code of Conduct, Complaints Handling Policy, Sexual Harassment Policy, Communications Policy, Acceptable Use policies and related instruments as the supporting policy framework;
- handbooks and operational instruments, including the Boarding Staff Handbook, the Staff Quick Reference (CP-005) and induction materials, that translate policy into practice;
- the policy and procedure register;
- visible publication and dissemination of policies and procedures to staff, students, parents/guardians, contractors and volunteers, in accordance with section 16(4) of the *Education (Accreditation of Non-State Schools) Regulation 2017* (Queensland).

Operational documents: the full policy framework named above, with the policy and procedure register held by the Risk, Compliance & Assurance Manager.

6 THE COLLEGE'S CHILD SAFETY CONTROLS

This section sets out the controls the College has in place to keep children safe. The controls are grouped by theme. Each is described below, with the Child Safe Standard it supports and the operational documents that give it day-to-day effect.

The section also covers the College's compliance with the Blue Card framework under chapters 7 and 8 of the *Working with Children Check Act 2000* (Queensland).

Appendix A summarises the mapping in tabular form. This section provides the substantive demonstration.

6.1 Statement of Commitment

The College maintains a statement of commitment to the safety and wellbeing of children and to protecting children from harm. This supports Child Safe Standard 1 (leadership, governance and culture).

The College's statement of commitment is the Commitment to Child Safety and Wellbeing at the front of this Plan. It is reflected in the Child Safety and Wellbeing Policy (CP-006). It is published on the College website. It is included in staff induction. It is communicated to parents/guardians at enrolment and through ongoing College communications.

6.2 CODE OF CONDUCT

The College maintains a code of conduct for everyone employed or otherwise engaged by the College who interacts with children. This supports Child Safe Standard 5 (suitable and supported people).

The College's code of conduct is the Staff Code of Conduct. All employees, contractors and volunteers must read, understand and act in accordance with the Code. The Code addresses:

- the failure-to-report and failure-to-protect obligations under sections 229BC and 229BB of the *Criminal Code Act 1899* (Queensland);
- the College's obligations under the Reportable Conduct Scheme;
- professional boundaries between staff and students;
- communication standards;
- the College's broader child safety expectations.

The Staff Quick Reference (CP-005) provides at-a-glance guidance for staff on the Code's most consequential provisions.

6.3 Recruitment, selection, training and management

The College's recruitment, selection, training and management of staff and volunteers reflect its commitment to the safety and wellbeing of children and to protecting children from harm. This supports Child Safe Standards 5 (suitable and supported people) and 7 (knowledge, skills and training).

The College's arrangements are addressed at section 5.5 (Standard 5) of this Plan. They are operationalised through the Recruitment, Selection and Induction procedures, the Staff Code of Conduct and the Reportable Conduct Procedure (CP-001).

6.4 Blue Card screening and compliance

Chapters 7 and 8 of the *Working with Children Check Act 2000* (Queensland) establish the Blue Card screening regime. The College complies through:

- requiring all relevant prospective and current employees, volunteers, trainees and Governing Body members to hold a current Blue Card or working with children authority before commencing engagement with the College, and verifying the validity and appropriateness of any currently held notice under the Act and the relevant position description;
- not allowing a person to continue work with children where their working with children authority is cancelled or suspended, or where a negative notice is received after a change of police information;
- requiring relevant prospective employees and volunteers engaging in restricted employment to acknowledge and sign the Restricted Person Declaration Form before commencing engagement;
- not allowing a person relying on an exemption to continue work with children if they become a restricted person;
- linking and unlinking individuals as they commence and conclude their engagement with the College;
- reminding employees to renew their working with children authority before expiry, and acting where renewal is not submitted in time;
- maintaining a Blue Card register held by the Risk, Compliance & Assurance Manager, with status reported regularly to the Principal and the Governing Body.

6.5 Handling disclosures or suspicions of harm

The College has policies and procedures for handling disclosures or suspicions of harm to children, including reporting guidelines. This supports Child Safe Standard 6 (child-focused complaints and concerns).

The College's processes are set out in the Student Protection Procedure (CP-004) and the Reportable Conduct Procedure (CP-001). They are supported by the Reportable Conduct Scheme Reporting Form (CP-002) and decision-making support in the Staff Quick Reference (CP-005).

These processes give effect to obligations under:

- section 13E of the *Child Protection Act 1999* (Queensland), mandatory reporting of suspected significant harm by sexual or physical abuse;
- sections 366 and 366A of the *Education (General Provisions) Act 2006* (Queensland), reporting suspected sexual abuse and likely sexual abuse (section 364 of that Act is the definitions section for Part 10, not a separate reporting obligation);
- sections 76 and 77 of the *Education (Queensland College of Teachers) Act 2005* (Queensland);
- the Reportable Conduct Scheme under the *Child Safe Organisations Act 2024* (Queensland), addressed at section 7 below.

6.6 Managing breaches of conduct and policy

The College manages breaches of its child safety conduct and policy framework. This supports Child Safe Standard 6 (child-focused complaints and concerns).

These are managed under the relevant operational instruments. These include the Staff Code of Conduct, the Complaints Handling Policy, the Complaint and Dispute Resolution Procedure, the Sexual Harassment Policy and the relevant employment instrument. Where a contravention engages the Reportable Conduct Scheme, the matter is handled under the Reportable Conduct Procedure (CP-001) and the Reportable Conduct Scheme Governance and Delegation Statement (CP-007).

6.7 Complying with Chapters 7 and 8 of the Act: implementation, review and recordkeeping

The College complies with chapters 7 and 8 of the *Working with Children Check Act 2000* (Queensland). It implements and reviews its child safety arrangements and keeps written records about matters under chapters 7 and 8 related to persons employed or otherwise engaged by the College. This supports Child Safe Standard 5 (suitable and supported people).

The College's Blue Card framework compliance is addressed at section 6.4 above. This Plan is implemented across the College's policy and procedure framework, with the Risk, Compliance & Assurance Manager coordinating monitoring and review. Annual review arrangements and continuous improvement are addressed at section 17 of this Plan. Records of decisions, incidents, notifications, training completion and Governing Body authorisations are maintained under the Records Management and Retention Policy.

6.8 High risk management plans

The College has plans for managing the risks associated with high risk activities and special events. This supports Child Safe Standard 8 (physical and online environments minimise the opportunity for harm).

The College has identified a set of activity areas and environments where elevated risk to children is foreseeable. Each is addressed in detail at section 8 of this Plan, with a stated risk profile, the key controls in summary, and cross-references to the operational documents that carry the day-to-day protocols.

6.9 Communication and support

The College communicates with and supports its community on child safety. This includes written information for staff, volunteers, children and parents/guardians, and training materials for staff and volunteers. This supports Child Safe Standards 7 (knowledge, skills and training) and 3 (families and communities).

This Plan and the related Child Protection series are published on the College website and through the Learning Hub. Staff training in child safety is delivered through the framework set out at section 5.7 (Standard 7) and section 15 (Training, education and communication) of this Plan. Communication with parents/guardians and engagement with families and communities are addressed at section 12 of this Plan and through the Communications Policy. Support arrangements for staff and students affected by child safety matters, including Employee Assistance Program access, pastoral care and counselling, are addressed in the relevant operational instruments.

7 REPORTABLE CONDUCT SCHEME

The Reportable Conduct Scheme is established under Chapter 3 of the *Child Safe Organisations Act 2024* (Queensland). It is administered by the Queensland Family and Child Commission. It commences on Wednesday 01 July 2026. As a reporting entity within the meaning of section 29 of the Act, the College must comply with the Scheme.

This section sets out the categories of reportable conduct, the College's response architecture and the cross-references to the operational documents. It does not reproduce operational detail. Operational detail sits in the Reportable Conduct Procedure (CP-001), the Reportable Conduct Scheme Reporting Form (CP-002), the Staff Quick Reference (CP-005) and the Reportable Conduct Scheme Governance and Delegation Statement (CP-007).

7.1 The six categories of reportable conduct

Section 26(1) of the *Child Safe Organisations Act 2024* (Queensland) defines reportable conduct as conduct of a worker that is one or more of the following six categories:

- a child sexual offence;
- sexual misconduct committed in relation to, or in the presence of, a child;
- ill-treatment of a child;
- significant neglect of a child;
- physical violence committed in relation to, or in the presence of, a child;
- behaviour that causes significant emotional or psychological harm to a child.

Two thresholds in the statutory definition warrant emphasis. First, the categories of "significant neglect" and "behaviour that causes significant emotional or psychological harm" both carry the qualifier "significant". Conduct that falls short of significance under those categories is not reportable conduct. Second, "physical violence" is defined in section 26(5) to mean the intentional or reckless application of physical force without lawful justification or excuse, or an act that intentionally or recklessly causes a person to anticipate immediate and unlawful violence. Trivial, negligible or insignificant physical force is excluded.

Reportable conduct is not limited to conduct that occurs in the course of work. Section 27(2) of the Act confirms that out-of-hours conduct can engage the Scheme. Section 26(3) of the Act provides that conduct may be reportable as a single act or omission, or as a series of acts or omissions, even if each individual act does not, on its own, amount to reportable conduct.

Decision-making by staff in identifying reportable conduct is supported by the Staff Quick Reference (CP-005) and the Reportable Conduct Procedure (CP-001).

7.2 What is not reportable conduct

Section 26(4) of the Act provides that reportable conduct does not include behaviour that is reasonable for the discipline, management or care of a child. Whether behaviour is reasonable is informed by the characteristics of the child (including age, developmental stage and health) and by any code of conduct or professional standard that applies to the conduct.

In practical terms, the exclusion captures:

- reasonable behaviour management consistent with the Staff Code of Conduct and the College's pastoral and behaviour support framework;
- accidents and incidents where no neglect or recklessness is involved;
- trivial incidents with no risk of significant harm;
- reasonable management or care of a child, including where the child has a disability or high-needs and is supported by a behaviour support plan or restrictive practice protocol authorised under that plan.

7.3 Head of Entity obligations

The Principal is the Head of Entity for the purposes of the Reportable Conduct Scheme. Under Chapter 3 of the Act, the Head of Entity must:

- ensure the College has systems in place to prevent reportable conduct, identify and respond to reportable allegations and reportable convictions, and support workers and children affected (section 30);
- notify the Queensland Family and Child Commission of any reportable allegation or reportable conviction relating to a worker (sections 33 and 34);
- provide an initial report to the Commission within three business days of becoming aware of the matter, unless the Commission agrees to a longer period (section 34(2)(a));
- provide an interim report where the investigation is not complete (contents requirements for the initial report and the interim report sit in section 35);
- investigate the reportable allegation or reportable conviction (section 36);
- provide a final report to the Commission as soon as practicable after the investigation is completed (section 37(1));
- Within 30 business days after becoming aware of the reportable allegation or conviction, the Head of Entity must give the Commission either an interim report or a final report.
- provide further information to the Commission on request (section 38).

Where a reportable allegation or reportable conviction concerns the Principal directly, the Board Chair assumes the Head of Entity role for that matter. The arrangements that apply in those circumstances are set out in the Reportable Conduct Scheme Governance and Delegation Statement (CP-007).

7.4 Notification, investigation and reporting

On becoming aware of a reportable allegation or a reportable conviction, the Principal makes the initial notification to the Queensland Family and Child Commission within three business days of becoming aware (section 34(2)(a)). The College then investigates the matter. The Principal directs the investigation, decides the investigator model on a case-by-case basis (see section 7.5 below) and manages the timeline. The Act, the Regulation and the Queensland Family and Child Commission guideline set no fixed final-report deadline. "As soon as practicable" is the statutory test under section 37(1).

Throughout the investigation, the College communicates with the Commission through interim reports as required. The College provides a final report to the Commission setting out the findings, the actions taken and any further notifications made to other regulators. Further notifications include those to the Queensland College of Teachers under sections 76 and 77 of the *Education (Queensland College of Teachers) Act 2005* (Queensland) and to Blue Card Services where applicable.

The operational pathway, including the timeframes, the report templates and the documentation requirements, is set out in the Reportable Conduct Procedure (CP-001) and the Reportable Conduct Scheme Reporting Form (CP-002).

7.5 Exemptions from particular Reportable Conduct Scheme requirements

Section 39 of the *Child Safe Organisations Act 2024* allows the Queensland Family and Child Commission to exempt a reporting entity from complying with specified Reportable Conduct Scheme requirements where the Commission is satisfied that the entity has the competence and resources to investigate reportable allegations or reportable convictions without Commission oversight, and has demonstrated competence in taking appropriate action in response to findings of reportable conduct.

The College does not assume that any exemption applies. Unless and until the Commission gives the College a written exemption, the Principal as Head of Entity must comply with the ordinary notification, investigation and reporting requirements under the Act. If an exemption is granted, the College will record the exemption in CP-007 and the CP-003 Reportable Conduct Scheme Notification Register, and will continue to comply with any residual notice or reporting obligation that applies under the exemption.

7.6 Investigator Model

The College's investigator model is mixed. The Principal decides whether to use an internal investigator or to engage an external investigator on a case-by-case basis. Considerations include:

- the nature of the allegation;
- the complexity of the matter;
- the seniority and role of the worker concerned;
- real or perceived conflicts of interest;
- the availability of suitably qualified internal personnel;
- the requirements and monitoring posture of the Queensland Family and Child Commission.

The investigator, whether internal or external, conducts the investigation in a child-centred, fair and lawful manner, and reports findings to the Principal. The Principal remains accountable as Head of Entity for the conduct and outcome of the investigation regardless of the investigator model chosen. Detail on the appointment of investigators, conflicts management, evidence handling, interview standards and report writing sits in CP-007.

7.7 Worker right to notify the Commission directly

Section 33(4) of the *Child Safe Organisations Act 2024* (Queensland) provides that any person, including a worker, may notify the Queensland Family and Child Commission of a reportable allegation or reportable conviction about a person at any time.

The College recognises and supports this right. Workers who consider that a reportable allegation or reportable conviction has not been adequately addressed within the College, or who hold concerns about reporting through internal channels, may notify the Commission directly. The College will not retaliate against a worker who exercises this right.

Section 33(2)(b) of the Act provides a related but distinct rule. Where the matter relates to the head of the reporting entity (the Principal), a worker who becomes aware of the matter must report directly to the Commission rather than to the head of the entity. The College's alternate arrangements under CP-007 are consistent with this provision.

7.8 Records management and information sharing

Records of reportable allegations, reportable convictions, notifications, investigations, findings, actions and notifications to other regulators are maintained by the Risk, Compliance & Assurance Manager under the Records Management and Retention Policy and the requirements of the *Child Safe Organisations Act 2024* (Queensland). Information sharing with the Commission, sector regulators and other prescribed entities is conducted under Chapter 4 of the Act.

7.9 Cross-references

The operational documents that give effect to this section are:

- **CP-001 Reportable Conduct Procedure:** the operational procedure for identifying, notifying, investigating and reporting reportable allegations and reportable convictions;
- **CP-002 Reportable Conduct Scheme Reporting Form:** the form used internally to capture a reportable allegation or reportable conviction;
- **CP-005 Staff Quick Reference:** the one-page reference for staff;
- **CP-007 Reportable Conduct Scheme Governance and Delegation Statement:** the delegations, alternate-Head-of-Entity arrangements, investigator model documentation and records-management requirements.

8 HIGH RISK MANAGEMENT PLANS

This section addresses Standard 8 of the *Child Safe Organisations Act 2024* (Queensland): physical and online environments minimise the opportunity for harm. It sets out the College's plans for managing the risks associated with high risk activities and special events.

The College has identified ten activity areas and environments where elevated risk to children is foreseeable. For each, this section sets out the risk profile, the key controls in summary and the operational documents in which the day-to-day protocols sit. The risk profiles draw on the College's operational experience as a North Queensland Catholic boarding college, on the standards published by the Australian Boarding Schools Association, and on the findings of the Royal Commission into Institutional Responses to Child Sexual Abuse.

The High Risk Management Plans operate together with the College's Risk Management Framework. The Plans in this section identify the activity-specific controls. Activity-specific operational risk assessments are completed under the Risk Management Framework where required.

8.1 Boarding: overnight supervision and personal privacy

Risk Profile

Boarding is a residential care setting in which children are in the care of College staff outside school hours, including overnight. Risk factors include:

- the supervisory dependency relationship between boarding staff and boarders;
- the personal-care contexts inherent to residential life (sleeping, bathing, dressing, illness);
- the age range and developmental needs of boarders from Year 7 onwards;
- the cultural and family circumstances of boarders, including international and Aboriginal and Torres Strait Islander boarders;
- the relative isolation from family-based oversight.

Key Controls

- supervision ratios consistent with the Australian Boarding Schools Association standards, with documented rostering held by the Dean of Boarding;
- sleepover shift protocols with two-deep arrangements where one-on-one contact would otherwise be foreseeable;
- dormitory and bathroom layout, access controls and personal privacy provisions for boarders;
- Working with Children authority verification for every adult present in the boarding precinct, including contractors, visitors and overnight guests;
- escalation pathways from boarding staff to the Dean of Boarding and the Principal, with the Board Chair available where the Principal is the subject of a concern;
- induction, ongoing training and supervision of boarding staff specific to the residential context.

Operational Documents

BRD-001 Boarding Operations Policy, BRD-003 Supervision and Accommodation, BRD-005 Visitors and Access, the Boarding Staff Handbook, and the relevant ABSA standards.

8.2 CAMPS, EXCURSIONS AND OVERNIGHT ACTIVITIES

Risk Profile

Camps, excursions and overnight activities place students outside the College's ordinary supervisory routines, often in unfamiliar environments and with varied staffing arrangements. Risk factors include:

- water-based and adventure activities;
- transport;
- host arrangements;
- distance from College support;
- communication challenges;
- the foreseeable potential for one-on-one contact with staff or third-party providers.

Key Controls

- a documented risk assessment for every camp, excursion or overnight activity, signed by the person in charge and acknowledged by all attending staff before departure;
- supervision ratios appropriate to the activity, the age of students and the venue;
- Working with Children authority verification for all adults present, including third-party providers;
- a child safety briefing with students at the commencement of each camp or excursion, including how to raise a concern;
- emergency contact protocols, including 24-hour contact between the lead staff member and the College, and arrangements for parental notification;
- documented leave and return procedures for boarders departing for and returning from camps, excursions and overnight activities.

Operational Documents

Excursions and Outings Procedure (SC-002), the College's risk assessment template, BRD-006 Leave and Transport for boarders, and the Risk Management Framework.

8.3 ONE-ON-ONE CONTEXTS: Tuition, counselling and instrumental music

Risk Profile

Some College activities involve foreseeable one-on-one contact between a staff member and a student, often in semi-private settings such as practice rooms, counselling offices or learning support spaces. The Royal Commission into Institutional Responses to Child Sexual Abuse identified one-on-one contexts as a setting in which grooming pathways are foreseeable, and where a sustained relationship of trust with a single staff member can be exploited.

Key Controls

- visibility: doors with windows or doors held partly open during one-on-one sessions; room layout that supports observation; visible scheduling of sessions;
- no private digital communication between staff and students outside approved College channels (see section 8.6 below);
- supervisor awareness of the one-on-one schedule, with line-management oversight of any departure from the schedule;
- staff training on grooming risk indicators and on professional boundaries in one-on-one settings;
- parental notification where a recurring one-on-one engagement is established (such as instrumental music tuition or counselling).

Operational Documents

Staff Code of Conduct, Communications Policy, the relevant pastoral care and learning support frameworks.

8.4 Sport and physical contact

Risk Profile

Sport involves foreseeable physical contact for technique correction, first aid, manual handling and team-based activity. It also involves change-room contexts, away travel, team relationships and recurring contact with coaches who may be College staff or external providers.

Key Controls

- consent and explanation in advance of physical contact for technique correction or manual handling;
- change-room supervision protocols, including same-gender supervision arrangements and no adult-only or one-on-one presence in change rooms;
- team travel protocols, including overnight accommodation arrangements, supervision ratios and parental notification;
- two-deep supervision where one-on-one contact would otherwise be unavoidable;
- Working with Children authority verification for coaches, instructors and external sport providers;
- first aid protocols, including documentation and notification of injury.

Operational Documents

Sport Coaching Protocols, the Staff Code of Conduct, BRD-007 Behaviour Management for the boarding context, and the Risk Management Framework.

8.5 Transport of students

Risk Profile

Transport of students involves a confined space, the potential for one-on-one travel, off-site activity and unfamiliar routes. Risks include unauthorised drivers, inadequate supervision, inadequate communication with parents/guardians, and the use of transport as a context for misconduct.

Key Controls

- vehicle authorisation under the Vehicle Driver Policy, including vehicle registration, insurance and driver licensing checks;
- prohibition on one-on-one transport other than in clearly defined and approved circumstances, with documented authorisation and parental notification;
- supervision protocols for student transport, including communication with the College and with parents/guardians;
- consent and notification arrangements for parents/guardians;
- particular protocols for boarders travelling to and from leave destinations, including host verification.

Operational Documents

Vehicle Driver Policy, BRD-006 Leave and Transport for boarders.

8.6 Online communication, devices and social media

Risk Profile

Online communication between staff and students, the use of personal devices and engagement with social media platforms create environments in which inappropriate contact can occur outside the supervisory awareness of the College. The Royal Commission into Institutional Responses to Child Sexual Abuse identified electronic communication as a primary grooming pathway. Standard 8 of the *Child Safe Organisations Act 2024* (Queensland) extends to online environments.

Key Controls

- staff communication with students occurs only through approved College channels and platforms; private messaging and personal social media connections with current students are prohibited;
- staff use of personal devices during supervisory duties is restricted under the Acceptable Use of Personal Devices Policy;

- student use of devices and online platforms is governed by the Acceptable Use of ICT Services Policy and supervised through approved College systems;
- monitoring through approved platforms is conducted under the College's privacy obligations;
- staff training on grooming pathways through electronic communication, including the indicators identified by the Royal Commission and the Office of the eSafety Commissioner.

Operational Documents

Communications Policy, Acceptable Use of ICT Services Policy, Acceptable Use of Personal Devices Policy, BRD-008 Communications and Devices for the boarding context.

8.7 Photography and videography of students

Risk Profile

Photography and videography of students create images that may be stored, shared or published. Risks include image-based abuse, unauthorised sharing and infringement of student privacy. Risks are heightened in boarding, sport, performing arts and overseas travel contexts where image capture may be informal.

Key Controls

- consent at enrolment for image capture and use, with the ability for parents/guardians to opt out;
- use of College-issued devices for image capture wherever possible;
- controlled storage of images on approved College systems;
- restrictions on use of personal devices for image capture in supervisory contexts;
- restrictions on image sharing outside approved College channels;
- particular protocols for images involving boarders, students with privacy concerns and Aboriginal and Torres Strait Islander cultural sensitivities.

Operational Documents

Photos and Social Media Framework, the Acceptable Use policies and the Communications Policy.

8.8 International boarders

Risk Profile

International boarders are subject to particular risk factors arising from:

- geographical and cultural distance from family;
- language barriers;
- visa-related vulnerability;
- longer contact intervals with families;
- host arrangements during leave.

The *Education Services for Overseas Students Act 2000* (Commonwealth) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 impose specific welfare and pastoral care obligations that overlay the Queensland framework.

Key Controls

- an Education Services for Overseas Students welfare and pastoral care framework that meets the National Code obligations;
- structured communication with families across distance and time zones, including translated material and interpreter access where required;
- host vetting and verification arrangements, including Working with Children authority verification for all adults in the host setting;
- language access support, including English as an Additional Language provision and access to bilingual support staff where available;
- cultural sensitivity practices, including engagement with diaspora communities and culturally appropriate pastoral care;
- a dedicated international student support function within the College's pastoral and boarding teams.

Operational Documents

BRD-009 International Boarders, the College's Education Services for Overseas Students compliance framework, and the relevant pastoral and boarding documents.

8.9 Medical care: College Student Health Centre and boarding medications

Risk Profile

The College's Student Health Centre and boarding medication arrangements involve:

- physical care contexts;
- medication administration;
- mental health support, including self-harm response;
- the receipt of disclosures by registered nurses (who are mandatory reporters under section 13E of the *Child Protection Act 1999* (Queensland)).

Confidentiality, information sharing and clinical decision-making intersect with the College's child safety obligations.

Key Controls

- Registered Nurse staffing of the Student Health Centre with documented clinical accountability and supervision;
- an Administration of Medication Policy governing the storage, administration and recording of medication for day students and boarders;
- mental health response protocols, including self-harm and suicide risk response, with escalation to College Psychologists and external clinicians as required;
- mandatory reporting awareness, training and recordkeeping for nursing staff;
- information sharing protocols under Chapter 5A of the *Child Protection Act 1999* (Queensland) and Chapter 4 of the *Child Safe Organisations Act 2024* (Queensland);
- dental and allied health protocols, including consent and documentation.

Operational Documents

Administration of Medication Policy, the Mental Health Response Procedure, BRD-004 Health and Wellbeing for boarders, and the College Health Centre operational protocols.

8.10 Behaviour support involving physical proximity

Risk Profile

Some students, particularly those with disability, complex needs or escalating behaviour, may require behaviour support that involves physical proximity, guided redirection or, in rare circumstances, physical intervention to prevent immediate harm. These contexts engage the section 26(4) exclusion under the *Child Safe Organisations Act 2024* (Queensland) (reasonable behaviour management consistent with codes of conduct and any applicable behaviour support plan). They also create risks of misunderstanding, escalation and disputed accounts.

Key Controls

- a Restorative Practices framework that prioritises de-escalation and relational repair over physical intervention;
- individualised behaviour support plans for students whose needs are foreseeable, with parental consent and notification;
- staff training in behaviour support, de-escalation and the use of physical proximity;
- documentation of any incident involving physical proximity or physical intervention, with a debrief and review process;
- compliance with restrictive practice obligations where they apply, under the relevant clinical and disability frameworks.

Operational Documents

Restorative Practices Framework, BRD-007 Behaviour Management for the boarding context, individualised behaviour support plans, and the College's disability and inclusion framework.

9 CULTURAL SAFETY: ABORIGINAL AND TORRES STRAIT ISLANDER STUDENTS

Cultural safety is recognised under the *Child Safe Organisations Act 2024* (Queensland) as integral to keeping children safe. Section 11(2) of the Act establishes the universal principle that a child safe entity must provide an environment that promotes and upholds the right to cultural safety of children who are Aboriginal persons or Torres Strait Islander persons.

For St Patrick's College Townsville, an independent Catholic boarding college on the lands of the Wulgurukaba and Bindal peoples, cultural safety has particular significance for Aboriginal and Torres Strait Islander students. This includes boarders who travel from country across Northern Queensland, the Cape, the Gulf and the Torres Strait Islands to attend the College.

Cultural safety means an environment that is spiritually, socially and emotionally safe for Aboriginal and Torres Strait Islander children, where there is no assault, challenge or denial of identity, of who they are or what they need. Cultural safety in practice is more than the absence of overt cultural hostility. It requires active practice that recognises identity, supports cultural maintenance and engages meaningfully with family and community.

The College gives effect to cultural safety through:

- engagement with the Wulgurukaba and Bindal peoples and the broader Aboriginal and Torres Strait Islander community in connection with the College's practice;
- the role of the Indigenous Community Engagement Officer, who is also a Student Protection Contact;
- structured engagement with the families of Aboriginal and Torres Strait Islander boarders, recognising the geographical, cultural and economic distance between many home communities and the College;
- cultural celebrations including National Aborigines and Islanders Day Observance Committee Week, Reconciliation Week and Mercy Day;
- cultural maintenance support for boarders separated from country, including connection to community, language and family;
- recognition in pastoral and disciplinary practice that culturally safe responses may differ from default approaches, with support from the Indigenous Community Engagement Officer;
- ongoing training for staff in cultural safety and culturally responsive practice;
- the College's Reconciliation Action Plan, which documents commitments and progress in the College's reconciliation journey.

Operational documents: Reconciliation Action Plan, Indigenous Community Engagement Officer role description, Boarding series, relevant pastoral and curriculum frameworks.

10 DIVERSE NEEDS

Standard 4 of the *Child Safe Organisations Act 2024* (Queensland) requires the College to take diverse needs into account in upholding equity. This section addresses the College's response to specific groups of students with diverse needs. It complements section 9 (cultural safety) which addresses Aboriginal and Torres Strait Islander students.

10.1 Students With Disability

Students with disability may face elevated risk in some contexts, including where physical care, behaviour support or communication adjustments are required.

The College gives effect to inclusive practice through:

- reasonable adjustments under the *Disability Standards for Education 2005* (Commonwealth);
- individualised support plans for students whose needs are foreseeable, developed with parents/guardians and the student;
- access to the College Health Centre, College Psychologists and external allied health support;
- ongoing training for staff in inclusive practice and disability-aware communication;
- behaviour support arrangements addressed at section 8.10 of this Plan.

Operational documents: College disability and inclusion framework, individualised support plans, relevant pastoral instruments.

10.2 LGBTIQ+ students

LGBTIQ+ students may face elevated risk where school environments are not actively inclusive.
The College gives effect to inclusive practice through:

- visible commitments to inclusion in the Student Code of Conduct, the Respectful Relationships and Antibullying Policy and pastoral practice;
- training for staff in inclusive practice;
- pastoral support arrangements that respect privacy and student autonomy in disclosure;
- responsive practice to bullying or discrimination on the grounds of sexual orientation or gender identity, under the *Anti-Discrimination Act 1991* (Queensland) and the *Sex Discrimination Act 1984* (Commonwealth).

Operational documents: Student Code of Conduct, Respectful Relationships and Antibullying Policy, Sexual Harassment Policy.

10.3 Culturally and linguistically diverse students

Students from culturally and linguistically diverse backgrounds may face barriers to safety where language, culture or migration circumstances are not accommodated.

The College gives effect to inclusive practice through:

- English as an Additional Language support;
- engagement with families through interpreters where necessary;
- cultural celebrations and recognition;
- ongoing training for staff in culturally responsive practice;
- recognition that disclosure of harm and engagement with reporting processes may be culturally affected, with sensitive practice by Student Protection Officers.

10.4 International students

International students at the College, including international boarders, are subject to specific welfare and pastoral care obligations under the *Education Services for Overseas Students Act 2000* (Commonwealth) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018. The risk profile is addressed at section 8.8 of this Plan. The inclusive-practice elements are addressed here.

The College gives effect to international student support through:

- a structured welfare and pastoral care framework that meets the National Code obligations;
- structured communication with families across distance, time zones and language;
- host arrangements with vetting and verification;
- access to language support, cultural resources and dedicated international student support staff.

Operational documents: BRD-009 International Boarders, College Education Services for Overseas Students compliance framework, relevant pastoral instruments.

11 CHILD VOICE AND PARTICIPATION

Standard 2 under the *Child Safe Organisations Act 2024* (Queensland) requires the College to inform children of their rights, support their participation in decisions that affect them and take what they say seriously. Section 5.2 of this Plan addresses the implementation of Standard 2 generally. This section provides the substantive framework for child voice and participation at the College.

The College gives effect to child voice and participation through:

- inclusion of children's rights in the curriculum, particularly through the Personal Development and Personal Education program;

- inclusion of children's rights and a child-friendly statement of the College's child safety commitments in the student diary and the Student Code of Conduct;
- structured forums for student voice, including Prefects, the Student Representative Council and the Boarding Council, with minutes captured and reflected in College Leadership Team and Governing Body discussions;
- year-level meetings and pastoral group meetings that surface student concerns and feedback;
- annual surveys of students, parents/guardians and staff in respect of child safety and wellbeing;
- pastoral care structures that support students to raise concerns with trusted adults, including the option of speaking with a trusted adult outside their direct supervisory line;
- the child-focused complaints process at section 13 of this Plan;
- recognition that children's voice influences College practice, with documented examples through the year cycle.

Operational documents: Student Code of Conduct, Personal Development and Personal Education curriculum, relevant pastoral instruments, Complaints Handling Policy.

12 FAMILIES AND COMMUNITIES

Standard 3 under the *Child Safe Organisations Act 2024* (Queensland) requires the College to inform and involve families and communities in promoting child safety. Section 5.3 of this Plan addresses the implementation of Standard 3 generally. This section provides the substantive framework for family and community engagement.

The College's family and community engagement is structured around three audiences:

- parents/guardians and families of day students;
- parents/guardians and families of boarders, who are often geographically distant;
- the broader communities the College is part of, including the Wulgurukaba and Bindal Traditional Custodians of the lands on which the College stands and the wider North Queensland and Torres Strait Islander communities from which boarders come.

The College gives effect to family and community engagement through:

- enrolment communications that set out child safety expectations, the role of parents/guardians and the available reporting and feedback channels;
- regular communication through newsletters, the College app, parent forums and parent-teacher conferences;
- specific engagement protocols for boarder families, including hybrid in-person, telephone and video communication for families unable to attend at the College;
- engagement with the Wulgurukaba and Bindal peoples and the broader Aboriginal and Torres Strait Islander community as addressed at section 9 of this Plan;
- parent committees, surveys and feedback channels;
- public publication of this Plan, the Child Safety and Wellbeing Policy, the Complaints Handling Policy and the Reconciliation Action Plan on the College website and through the Learning Hub.

Operational documents: Communications Policy, Reconciliation Action Plan, relevant pastoral and boarding instruments.

13 COMPLAINTS, INCLUDING CHILD-FOCUSED PROCESSES

Standard 6 under the *Child Safe Organisations Act 2024* (Queensland) requires the College to maintain processes for complaints and concerns that are child-focused. Section 5.6 of this Plan addresses the implementation of Standard 6 generally. This section is brief and points to the operational instruments.

Complaints from children, parents/guardians and other parties are handled under the Complaints Handling Policy and the Complaint and Dispute Resolution Procedure, which prioritise the safety and wellbeing of children. Complaints that engage child safety obligations are escalated to the Principal and managed concurrently under the Reportable Conduct Procedure (CP-001) and the Student Protection Procedure (CP-004).

The College provides multiple accessible channels for children to raise concerns:

- direct contact with named Student Protection Officers;
- access to College Psychologists, pastoral leaders and the Indigenous Community Engagement Officer;
- specific provisions in the boarding context for boarders to raise concerns confidentially and outside the boarding leadership chain where required;
- communication with children about the existence and use of complaints channels, in age-appropriate language;
- record-keeping and feedback to children on outcomes, where appropriate to the matter and to the child's age and circumstances.

Operational documents: Complaints Handling Policy, Complaint and Dispute Resolution Procedure, Student Protection Procedure (CP-004), Reportable Conduct Procedure (CP-001), Sexual Harassment Policy where applicable.

14 INFORMATION SHARING

Effective child safety practice requires the appropriate sharing of information between agencies and within the College. The College participates in information sharing under:

- Chapter 5A of the *Child Protection Act 1999* (Queensland), which establishes information-sharing arrangements between prescribed entities for child safety purposes;
- Chapter 4 of the *Child Safe Organisations Act 2024* (Queensland), which provides for the sharing of information between prescribed entities in relation to the Child Safe Standards and the Reportable Conduct Scheme;
- the College's privacy obligations under the *Privacy Act 1988* (Commonwealth) where applicable.

The College both shares information with and receives information from:

- Child Safety Services;
- the Queensland Family and Child Commission;
- the Queensland Police Service;
- the Queensland College of Teachers;
- Blue Card Services;
- sector regulators and other prescribed entities.

Information sharing within the College is managed under the College's privacy and confidentiality framework. Information is shared on a need-to-know basis to those with a legitimate role in responding to a child safety matter.

Operational documents: Privacy Policy, Reportable Conduct Procedure (CP-001), Student Protection Procedure (CP-004), Records Management and Retention Policy.

15 TRAINING, EDUCATION AND COMMUNICATION

Standard 7 under the *Child Safe Organisations Act 2024* (Queensland) requires the College to equip staff and volunteers with the knowledge, skills and awareness to keep children safe through ongoing education and training. Section 5.7 of this Plan addresses the implementation of Standard 7 generally. This section provides the substantive training framework.

15.1 Induction

All new employees, contractors and volunteers complete a child safety induction before commencing engagement with the College. The induction covers:

- this Plan;
- the Staff Code of Conduct;
- the Child Protection series;
- mandatory reporting under section 13E of the *Child Protection Act 1999* (Queensland) and the relevant Education Acts;
- the Reportable Conduct Scheme;
- the failure-to-report and failure-to-protect obligations under sections 229BC and 229BB of the *Criminal Code Act 1899* (Queensland);

- the College's Acceptable Use policies.

Completion of induction is recorded by the Risk, Compliance & Assurance Manager.

15.2 Annual training

All employees, contractors and volunteers complete annual child safety training. Annual training is delivered through structured sessions and through the College's Learning Hub. Content is updated to reflect legislative and sector developments.

15.3 Role-specific training

Role-specific training is provided for:

- Student Protection Officers, including training on the Reportable Conduct Scheme;
- the Risk, Compliance & Assurance Manager, including training on the Reportable Conduct Scheme;
- the Principal as Head of Entity for the Reportable Conduct Scheme;
- boarding staff, including training on the boarding context, supervision and Australian Boarding Schools Association standards;
- College Health Centre staff, including mandatory reporting training;
- pastoral leaders and counsellors, including training on receiving disclosures;
- the Governing Body, in respect of governance accountabilities for child safety.

15.4 Training Register

The Risk, Compliance & Assurance Manager maintains a training register that records completion of induction, annual and role-specific training. The register is reported regularly to the Principal and the Governing Body.

15.5 Communication

The College communicates child safety information through staff meetings, professional development days, the Learning Hub, the College app, newsletters and direct communication. Material child safety updates (for example legislative changes, regulatory guidance or significant operational changes) are communicated to staff promptly.

Operational documents: Training Framework, staff induction program, Risk, Compliance & Assurance Manager's training register.

16 RECORDS MANAGEMENT

The College maintains records of:

- this Plan and the related Child Protection series, with version history and authorisation records;
- the Blue Card register, including currency and renewal status;
- training completion across induction, annual and role-specific training;
- decisions, incidents, disclosures, allegations, notifications, investigations and outcomes relating to child safety, including under the Reportable Conduct Scheme;
- complaints relating to children;
- correspondence with regulators, including the Queensland Family and Child Commission, Blue Card Services, the Queensland College of Teachers, the Department of Education and Child Safety Services;
- Governing Body reporting on child safety.

Records are maintained under the Records Management and Retention Policy, the requirements of the *Child Safe Organisations Act 2024* (Queensland), the *Working with Children Check Act 2000* (Queensland) and the College's privacy obligations.

Records relating to reportable allegations and reportable convictions under the Reportable Conduct Scheme are retained for the periods specified in the Records Management and Retention Policy, in accordance with the Act and any guidance issued by the Queensland Family and Child Commission. Access to these records is restricted to those with a legitimate role in the matter.

Operational documents: Records Management and Retention Policy, Reportable Conduct Scheme Governance and Delegation Statement (CP-007).

17 IMPLEMENTATION, MONITORING AND REVIEW

This Plan is implemented across the College's policy and procedure framework. The Risk, Compliance & Assurance Manager has day-to-day operational responsibility for the Plan's implementation, supported by the Principal, the College Leadership Team, the Dean of Boarding and Student Protection Officers.

17.1 Implementation responsibilities

The Plan is implemented through:

- the policy and procedure framework set out at section 5.10;
- staff induction, training and supervision arrangements at section 15;
- ongoing operational practice across the College, including in boarding, classrooms, sport, extracurricular activities, transport and online environments;
- Governing Body oversight and reporting.

17.2 Annual Review cycle

This Plan is reviewed annually by the Risk, Compliance & Assurance Manager, in consultation with the Principal, the College Leadership Team, the Dean of Boarding and the Student Protection Officers. The annual review:

- assesses the Plan against the current legislative and regulatory framework;
- considers any incidents, allegations or convictions under the Reportable Conduct Scheme and the lessons learned from them;
- reviews the operational documents in the Child Protection series and the Boarding series for consistency with this Plan;
- considers feedback from students, parents/guardians, staff and the broader College community;
- considers regulatory and sector developments, including changes to legislation, Queensland Family and Child Commission guidance, Catholic Education sector guidance and Australian Boarding Schools Association standards;
- recommends amendments for Governing Body authorisation where required.

The Plan is re-authorised by the Governing Body whenever a material change is made.

17.3 Self-assessment against the Child Safe Standards

A self-assessment against the Ten Child Safe Standards is conducted as part of the annual review, using the College's Child Safe Standards Self-Assessment instrument. The findings are reported to the Governing Body and inform the next year's continuous improvement priorities.

17.4 Continual improvement

Continual improvement is informed by:

- the annual review and self-assessment;
- review of incidents, complaints and concerns;
- regulatory and sector developments;
- feedback from students, parents/guardians, staff and the broader College community;
- engagement with the Queensland Family and Child Commission, Independent Schools Queensland, the Australian Boarding Schools Association and other sector bodies;
- engagement with the Catholic Education sector.
-

The Risk, Compliance & Assurance Manager maintains a continual improvement register that captures findings, planned actions, owners and target dates, and reports progress to the Principal and the Governing Body.

Operational documents: Annual review schedule maintained by the Risk, Compliance & Assurance Manager, Child Safe Standards Self-Assessment instrument, continual improvement register, Governing Body reporting.

18 REFERENCES

Statutory And Regulatory Framework

- *Anti-Discrimination Act 1991* (Queensland)
- *Child Protection Act 1999* (Queensland)
- *Child Safe Organisations Act 2024* (Queensland)
- *Child Safe Organisations Regulation 2025* (Queensland)
- *Criminal Code Act 1899* (Queensland)
- *Disability Standards for Education 2005* (Commonwealth)
- *Education (Accreditation of Non-State Schools) Regulation 2017* (Queensland)
- *Education (General Provisions) Act 2006* (Queensland)
- *Education (Queensland College of Teachers) Act 2005* (Queensland)
- *Education Services for Overseas Students Act 2000* (Commonwealth)
- *Privacy Act 1988* (Commonwealth)
- *Public Guardian Act 2014* (Queensland)
- *Sex Discrimination Act 1984* (Commonwealth)
- *Working with Children Check Act 2000* (Queensland)
- *Working with Children (Risk Management and Screening) Regulation 2020* (Queensland)

External Guidance

- Australian Boarding Schools Association: ABSA Standards
- Australian Human Rights Commission: Guidelines for Complying with the Positive Duty under the *Sex Discrimination Act 1984* (Cth)
- Independent Schools Queensland: Child Protection Decision Support Trees
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- National Principles for Child Safe Organisations
- Queensland Family and Child Commission: Queensland's Reportable Conduct Scheme Guideline
- Royal Commission into Institutional Responses to Child Sexual Abuse: Final Report and Recommendations

APPENDIX A: MAPPING: CHILD SAFETY CONTROLS AND BLUE CARD COMPLIANCE

This appendix maps the College's child safety controls to the Ten Child Safe Standards, and to the section of this Plan and the operational documents in which each control is set out. It also shows the College's Blue Card compliance under chapters 7 and 8 of the *Working with Children Check Act 2000* (Queensland).

Control / Standard	Plan section	Operational documents
Statement of commitment (Child Safe Standard 1)	1, 6.1	Commitment to Child Safety and Wellbeing (front matter); CP-006 Child Safety and Wellbeing Policy
Code of conduct (Child Safe Standard 5)	6.2	Staff Code of Conduct; CP-005 Staff Quick Reference
Recruitment, selection, training and management (Child Safe Standards 5 and 7)	5.5, 6.3	Recruitment, Selection and Induction procedures; Staff Code of Conduct; CP-001
Handling disclosures or suspicions of harm (Child Safe Standard 6)	6.5, 13	CP-001; CP-002; CP-004 Student Protection Procedure; CP-005
Managing breaches of conduct and policy (Child Safe Standard 6)	6.6	Staff Code of Conduct; Complaints Handling Policy; Complaint and Dispute Resolution Procedure; Sexual Harassment Policy; CP-001; CP-007
Blue Card compliance, chapters 7 and 8 of the Act (Child Safe Standard 5)	6.4, 6.7, 16, 17	Risk, Compliance & Assurance Manager review schedule; Blue Card register; Records Management and Retention Policy
High risk activities and special events (Child Safe Standard 8)	6.8, 8	Boarding series (BRD-001 to BRD-010); Excursions and Outings Procedure (SC-002); Vehicle Driver Policy; Acceptable Use policies; Communications Policy; Restorative Practices Framework
Communication and support (Child Safe Standards 7 and 3)	6.9, 12, 15	Communications Policy; Training Framework; Learning Hub
Blue Card screening framework, chapters 7 and 8 of the Act	6.4	Blue Card register; Restricted Person Declaration Form; CP-007

APPENDIX B: MAPPING: TEN CHILD SAFE STANDARDS

This appendix maps each of the Ten Child Safe Standards under section 9 of the *Child Safe Organisations Act 2024* (Queensland) to the section of this Plan and the operational documents in which the College's response is set out.

Control / Standard	Plan section	Operational documents
Standard 1 (section 9): Leadership, governance and culture	5.1, 4	CP-006; CP-001; CP-004; Staff Code of Conduct
Standard 2 (section 9): Children's rights and participation	5.2, 11	Student Code of Conduct; Personal Development and Personal Education curriculum; Complaints Handling Policy
Standard 3 (section 9): Families and communities	5.3, 12	Communications Policy; Reconciliation Action Plan; Boarding series
Standard 4 (section 9): Equity and diverse needs	5.4, 9, 10	Student Code of Conduct; Respectful Relationships and Antibullying Policy; BRD-009; disability and inclusion frameworks
Standard 5 (section 9): Suitable, supported people	5.5, 6.3, 6.4	Recruitment, Selection and Induction procedures; Staff Code of Conduct; Blue Card register; CP-001; CP-007
Standard 6 (section 9): Child-focused complaints	5.6, 13	Complaints Handling Policy; Complaint and Dispute Resolution Procedure; CP-001; CP-004
Standard 7 (section 9): Ongoing education and training	5.7, 15	Training Framework; staff induction program; Risk, Compliance & Assurance Manager's training register
Standard 8 (section 9): Safe physical and online environments	5.8, 8	High Risk Management Plans (section 8); Boarding series; Acceptable Use policies; Communications Policy
Standard 9 (section 9): Continuous improvement	5.9, 17	Annual review schedule; Child Safe Standards Self-Assessment process; Governing Body reporting
Standard 10 (section 9): Policies and procedures	5.10	Full document architecture set out at section 5.10

APPENDIX C: MAPPING: REPORTABLE CONDUCT SCHEME

This appendix maps the principal provisions of Chapter 3 of the *Child Safe Organisations Act 2024* (Queensland), which establishes the Reportable Conduct Scheme administered by the Queensland Family and Child Commission, to the section of this Plan and the operational documents in which the College's response is set out. The Scheme commences on Wednesday 01 July 2026.

Control / Standard	Plan section	Operational documents
Section 26: Meaning of reportable conduct (six categories at section 26(1); definitions at section 26(5); pattern provision at section 26(3); exclusion at section 26(4))	3, 7.1, 7.2	CP-001 Reportable Conduct Procedure; CP-005 Staff Quick Reference
Section 27: Meaning of reportable allegation; out-of-hours conduct can engage the Scheme (section 27(2))	3, 7.1	CP-001; CP-005
Section 28: Meaning of reportable conviction	3, 7.1	CP-001; CP-005
Section 29: Meaning of reporting entity	2.2, 2.3, 7	CP-001; CP-007
Section 30: Head of reporting entity must ensure systems in place	4.2, 7.3	This Plan; CP-001; CP-007
Sections 33 and 34: Notification of reportable allegations and convictions; initial report within 3 business days of becoming aware (section 34(2)(a))	7.3, 7.4, 7.6	CP-001; CP-002; CP-007
Section 35: Contents requirements for the initial report and the interim report	7.4	CP-001; CP-002
Section 36: Head of reporting entity must investigate	7.3, 7.4, 7.5	CP-001; CP-007
Section 37: Final report (as soon as practicable after investigation completed)	7.3, 7.4	CP-001; CP-002
Section 38: Commission may ask for further information	7.3, 7.4	CP-001; CP-007
Section 39: Exemptions	7	CP-007; CP-001; CP-003 Reportable Conduct Scheme Notification Register
Chapter 4: Information sharing for the Reportable Conduct Scheme	7.7, 14	CP-001; CP-007; Records Management and Retention Policy

APPENDIX D: MAPPING: OTHER REPORTING AND CHILD SAFETY OBLIGATIONS

This appendix is an assurance map. It shows where the College's child protection, mandatory reporting, teacher notification, criminal reporting, student protection, privacy and related child safety obligations are addressed within the Child Safety Management Plan and the supporting operational documents. It is intended for governance, audit and compliance review. Staff should use CP-004 Student Protection Procedure and CP-005 Staff Quick Reference when responding to a child safety concern.

Control / Standard	Plan section	Operational documents
Section 13E of the *Child Protection Act 1999* (Queensland): Mandatory reporting of suspected significant harm by physical or sexual abuse (teachers, registered nurses for the College)	2.4, 6.5	CP-004 Student Protection Procedure; CP-005. Reports made to the chief executive of the department administering the *Child Protection Act 1999* (currently the Department of Families, Seniors, Disability Services and Child Safety, operating through Child Safety Services).
Sections 366, 366A and 366B of the *Education (General Provisions) Act 2006* (Queensland): reporting sexual abuse and likely sexual abuse of a student of a non-state school, and statutory protection associated with reports made under Part 10. Section 364 is the definitions section for Part 10, not a separate reporting obligation.	2.5, 6.5	CP-004; CP-005. Reports are made internally to the Principal or a director of the Governing Body, then immediately provided to the Queensland Police Service as required by the Act.
Sections 76, 77 and 78 of the *Education (Queensland College of Teachers) Act 2005* (Queensland): notification to the Queensland College of Teachers when the employing authority starts to deal with an allegation about a registered teacher, further notice when the employing authority finishes dealing with the allegation, and related notice requirements.	2.5, 7.4	CP-001; CP-004; CP-007. Notifications are coordinated by the Principal on behalf of the employing authority.
Section 229BC of the *Criminal Code Act 1899* (Queensland): Failure to report belief of child sexual offence (universal adult obligation)	2.6, 6.5	Staff Code of Conduct; CP-005. Reports made to the Queensland Police Service.
Section 229BB of the Criminal Code Act 1899 (Queensland): Failure to protect a child from a child sexual offence (accountable persons in institutions)	2.6, 6.2	Staff Code of Conduct; CP-001; CP-007. Compliance is conduct-based.
Sections 210A and 229B(1A) of the *Criminal Code Act 1899* (Queensland): sexual conduct with a 16- or 17-year-old by an adult who has the child under their care, supervision or authority, including repeated conduct captured by the maintaining-a-relationship offence.	2.6, 6.2, 6.5	Staff Code of Conduct; CP-004; CP-005; CP-001 where the alleged person is a worker of the College. Reports are made to the Queensland Police Service where a criminal offence is suspected.

Control / Standard	Plan section	Operational documents
Section 47C of the *Sex Discrimination Act 1984* (Commonwealth): Positive duty to take reasonable and proportionate measures to eliminate, as far as possible, sex discrimination, sexual harassment, sex-based harassment, conduct subjecting a person to a workplace environment hostile on the ground of sex, and related acts of victimisation	2.7	Sexual Harassment Policy; Staff Code of Conduct; Complaints Handling Policy. Compliance overseen by the Australian Human Rights Commission.
Sections 16(1), 16(2), 16(3) and 16(4) of the *Education (Accreditation of Non-State Schools) Regulation 2017* (Queensland): written student protection processes, student access to a process for reporting inappropriate behaviour by staff, and dissemination of those processes.	2.5, 13, 15	CP-004; CP-005; CP-006; this Plan. Compliance is overseen by the Non-State Schools Accreditation Board.
Chapter 5A of the *Child Protection Act 1999* (Queensland): Information sharing between prescribed entities for child safety purposes	14	Privacy Policy; CP-001; CP-004; Records Management and Retention Policy.

CHANGE LOG

This change log records the version history of this Plan. Revisions are recorded below.

Version	Date	Change

end of Plan