

**TSA Independent School  
YOS Lawnton and YOS Lawnton (Riverview)  
(Queensland Non-State Independent School)**

**Child Protection Risk Management Strategy**

**Code: CPRM2024**

<b>Purpose:</b>	The purpose of this strategy is to eliminate and minimise risk to student safety to ensure the safety and wellbeing of students.	
<b>Filing Instructions:</b>	SharePoint: <a href="#">TSA Independent Schools - Finalised Policies and Procedures - All Documents (sharepoint.com)</a>	
<b>Scope:</b>	Students and employees, including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements	
<b>Status:</b>	Approved V10.5	Supersedes: V10.4
<b>Authorised By:</b>	Lieut.-Colonel Greg Morgan TSA Independent Schools Advisory Group (ISAG) Chair	Date of Authorisation: January 2024

<b>References:</b>	<ul style="list-style-type: none"> <li>• <a href="#">Working with Children (Risk Management and Screening) Act 2000 (Qld)</a></li> <li>• <a href="#">Working with Children (Risk Management and Screening) Regulations 2020 (Qld)</a></li> <li>• <a href="#">Child Protection Act 1999 (Qld)</a></li> <li>• <a href="#">Education (Accreditation of Non-State Schools) Act 2017 (Qld)</a></li> <li>• <a href="#">Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)</a></li> <li>• <a href="#">Education (General Provisions) Act 2006 (Qld)</a></li> <li>• <a href="#">Education (General Provisions) Regulation 2017 (Qld)</a></li> <li>• <a href="#">Education Services for Overseas Students (ESOS) Act 2000 (cth)</a></li> <li>• <a href="#">Education (Overseas Students) Regulation 2018 (Qld)</a></li> <li>• <a href="#">Education (Queensland College of Teachers) Act 2005 (Qld)</a></li> <li>• <a href="#">Education and Care Services National Law (Queensland)</a></li> <li>• <a href="#">Criminal Code Act 1899 (sections 229BB and 229BC)</a></li> <li>• <a href="#">Blue Card Services Child and Youth Risk Management Strategy Toolkit</a></li> <li>• <a href="#">Restricted Person Declaration Form</a></li> <li>• <a href="#">TSA Safeguarding Children and Young People Toolkit</a></li> </ul>	
<b>Review Date:</b>	Annually	Next Review Date: December 2024
<b>Policy Owner:</b>	TSA Independent Schools Advisory Group (ISAG)	

### Change Record/Revision History:

Version	Prepared/ reviewed by	Date reviewed	Approved by	Authorised by	Review date
10.1	Helen Boardman	December 2019	Darren McGhee	Rish Lefterys	December 2020
10.2	Helen Boardman	Amendments: 5/5/2020	Darren McGhee	Rish Lefterys	December 2021
10.3	Helen Boardman	December 2021	Shontell Dougherty	Rish Lefterys	December 2022
10.4	Riley Hore	Amendments: 14/02/24	Helen Boardman	ISAG	December 2023
10.5	Riley Hore		Helen Boardman	ISAG (Greg Morgan)	December 2024



## 1. Statement of Commitment

TSA Independent School is committed to the safety and wellbeing of students enrolled at the school and their protection from foreseeable harm<sup>1</sup>. In practice, TSA Independent School is committed to acting in accordance to the Working with Children (Risk Management and Screening) Act 2000 (Qld) (“the Act”) to promote the safety and wellbeing of students means that it will implement the measures outlined below in points.

## 2. Code of Conduct

At TSA Independent Schools we expect our employees to conduct themselves as stated in The Salvation Army Code of Conduct and as follows:



School employees are expected to always behave in ways that promote the safety, welfare and well-being of our students. Employees must actively seek to prevent harm to students, and to support those who have been harmed.

Specific responsibilities include:

- Personal and professional conduct must strive to create a harmonious safe and productive work environment which models our Christian Values, Ethos and Mission.<sup>2</sup>
- They must actively seek to prevent harm to children and young people, and to support those who have been harmed
- Employees should avoid situations where they are alone in an enclosed space with a student
- When physical contact with a student is a necessary part of the teaching/learning experience, employees must exercise caution to ensure that the contact is appropriate and acceptable. Employees must always advise the student of what they intend doing and seek their consent
- Employees must not develop a relationship with any student that is, or that can be interpreted as having a personal rather than a professional interest in a student
- Employees must not have a romantic or sexual relationship with a student

This commitment is evidence of TSA Independent School’s fulfilment of the requirements of Schedule 1 s.2(2).

## 3. Recruitment, Selection, Training and Management Procedures

TSA Independent School is committed to recruiting, selecting, training and managing employees in such a way that limits risks to students. In particular, TSA Independent School will:

- Ensure that it’s recruitment and selection procedures act to reduce the risk of harm to children from employees via:
  - Accurate position descriptions, including whether the successful applicant must be a teacher registered with the Queensland College of Teachers (who has been subject to relevant police and other safety checks), whether a Blue Card is necessary for the successful applicant, the responsibilities and supervision associated with the position,

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<sup>1</sup> Working with Children (Risk Management and Screening) Regulation 2020 (Qld) Sch 1 s.2(1)

<sup>2</sup> The Salvation Army Code of Conduct

- the nature and environment of the service provided to students, and the experience and qualifications required by the successful applicant.
- Advertising the position with a clear statement about the school's commitment to safe and supportive work practices and identifying that candidates will be subject to a teacher registration check and Blue Card screening, a police check, referee checks, identification verification and the requirement to disclose any information relevant to the candidates' eligibility to engage in activities including children.
  - A selection process that includes assessing the application via an interview process and referee and other checks (as identified above) based on the accurate position description.
  - A probationary period of employment, which allows the school to further assess the suitability of the new employee and to act as a check on the selection process.
- Ensures that its training and management procedures act to reduce the risk of harm to students from employees via:
    - Management processes that are consistent, fair and supportive
    - Annual performance review processes to help employees improve their performance in a positive manner.
    - Supportive processes for staff when they are experiencing challenges, such as mentoring, mediation, conflict resolution, coaching, additional training and external support, supervision and counselling services.
    - An induction program which thoroughly addresses the school's policies and procedures, particularly its expectations regarding student risk management and to assist employees to understand their role in providing a safe and supportive environment for students.
    - Training new and existing staff on an ongoing basis to enhance skills and knowledge and to reduce exposure to risks, as follows:
      - The school's policies and procedures
      - Identifying, assessing and minimising risks to students
      - Handling a disclosure or suspicion of harm to a child
    - Keeping a record of the training provided to employees.
    - Exit interviews to assist the school to identify broader issues of concern that may impact on the safety and wellbeing of children at the school.

This commitment is evidence of TSA Independent School's fulfilment of the requirements of Schedule 1 s.2(3)

#### **4. Handling Disclosures or Suspicions of Harm**

Any of the types of concerns or reports below should be reported and managed under the TSA Independent School's Child Protection Policy and Procedure, as follows:

- All staff with concerns about sexual abuse or likely sexual abuse or a child sexual offence committed by an adult
- Teachers, nurses and early childhood education and care professionals with concerns of sexual or physical abuse
- All staff who have received a report of inappropriate behaviour by another staff member.

To report any type of harm, all staff members should use the process documented at the end of this document.

Furthermore, and in accordance with section 76 of the *Education (Queensland College of Teachers) Act 2005*, the Principal of TSA Independent School will report to the Queensland College of Teachers any investigations into allegations of harm caused, or likely to be caused, to a student because of the conduct of a relevant teacher at the school.

Any report made under this section or the TSA Independent School's Child Protection Policy will fulfill the reporting obligations of all adults under the *Criminal Code Act 1899*.

This commitment is evidence of TSA Independent School's fulfilment of the requirements of Schedule 1 s.2(4)

## **5. Managing Breaches of this Child Risk Management Strategy**

TSA Independent School is committed to appropriately managing breaches of this Child Risk Management Strategy in accordance with its other relevant policies as appropriate in the circumstances, such as its Child Protection Policy, Employee Code of Conduct, Complaints Handling Policy and Procedures and TSA Performance Planning and Review Processes. This is evidence of fulfilment of the requirements of Schedule 1 s.2(5).

## **6. Implementing and Reviewing the Child Risk Management Strategy**

This Strategy in its entirety and its related policies and procedures are evidence of fulfilment of the requirements of Schedule 1 s.2(6)(a) relating to implementation.

The introduction to this Child Risk Management Strategy and the "Compliance and Monitoring" section below states TSA Independent School's commitment to reviewing the Strategy annually and are evidence of fulfilment of the requirements of section 3(1)(f)(i) of the Regulation relating to review.

## **7. Blue Card Policies and Procedures**

TSA Independent School is committed to acting in accordance with chapters 7 and 8 of the Act relating to the screening of employees in such a way that limits risks to children. In particular, TSA Independent School will:

- Require relevant perspective or current employees, volunteers, trainee students and school board members to have working with children authority, and check the validity and appropriateness of any currently held notices in accordance with the TSA Independent School's position descriptions and the Act prior to the commencement of their engagement.
- Not allow a person to continue to work with children if their working with child authority is cancelled or suspended or a negative notice is received after a change of police information.
- Have all relevant prospective employees and volunteers engaging in Restricted Employment acknowledge and sign a Restricted Person Declaration Form declaring that they are not a restricted person prior to commencing their engagement.
- Request reporting on blue card status and renewal through HR Data Management (Workday)
- Not allow a person relying on an exemption to continue to work with children if they become a restricted person.



- Link and unlink individuals as they commence and conclude their engagement with the school.
- Appoint a school contact person to liaise with school TSA HR Business Partner for management of the working with children screening process and all related documents and records.
- Keep written records of all the above actions, decisions and outcomes, including the dates of expiry for working with children authority.
- Ensure that all information in relation to working with children authority is kept confidential
- Act to remind employees to keep their working with children authority up to date and apply for a renewal prior to expiry.
- Take appropriate action if an employee, volunteer, trainee student or school board member fails to submit a renewal application prior to their working with children authority expiring.

This commitment is evidence of TSA Independent School's fulfilment of the requirements of sSchedule 1 s.2(6)(b)

### **8. High Risk Management Plans**

TSA Independent School's Risk Management Framework is evidence of fulfillment of the requirements of Schedule 1 s.2(7)

### **9. Strategies of Communication and Support**

TSA Independent School is commitment to making this Child Risk Management Strategy available to students, parents and employees via its enrolment package, staff induction process, storage on Sharepoint (Intranet) and website, is evidence of fulfilment of the requirements of Schedule 1 s. 2(8)(a).

TSA Independent School is committed to training employees in relation to risks to students and will conduct this training regularly via annual formal training events, informal updates at staff meetings and regular discussions between managers and their staff, and this is evidence of fulfilment of the requirements of Schedule 1 s.2(8)(b)

#### **Responsibilities**

TSA Independent School is responsible for developing and implementing this Child Risk Management Strategy and related policies and procedures to ensure it fulfils its obligations.

All employees are responsible for acting in compliance with this Child Risk Management Strategy and related policies and procedures.

#### **Compliance and Monitoring**

TSA Independent School is committed to the annual review of this Strategy and will record, monitor and report to the TSA School Board (ISAG) and the TSA Senior Social Mission Executive regarding any breaches of the Strategy.

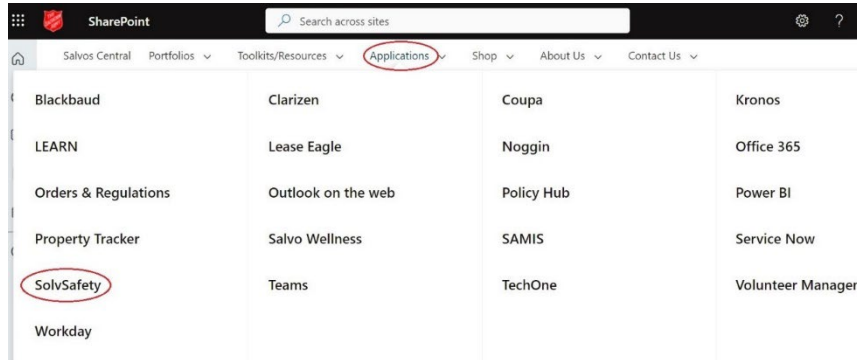
In addition, TSA Independent School is committed to other various compliance and monitoring arrangements made under relevant policies and procedures.



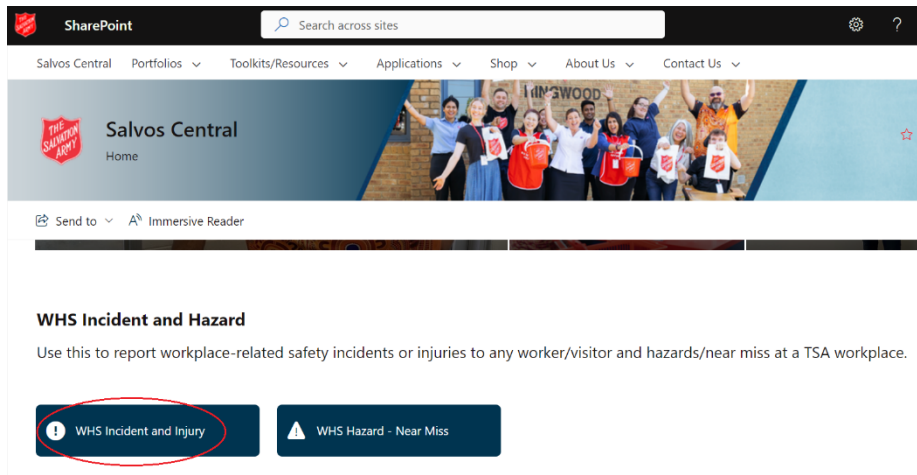
## SolvSafety – Accidents, Injury, or Critical Incident Reporting

Follow the below flowchart and instructions for reporting all accidents, injury, or critical incident concerns on SolvSafety:

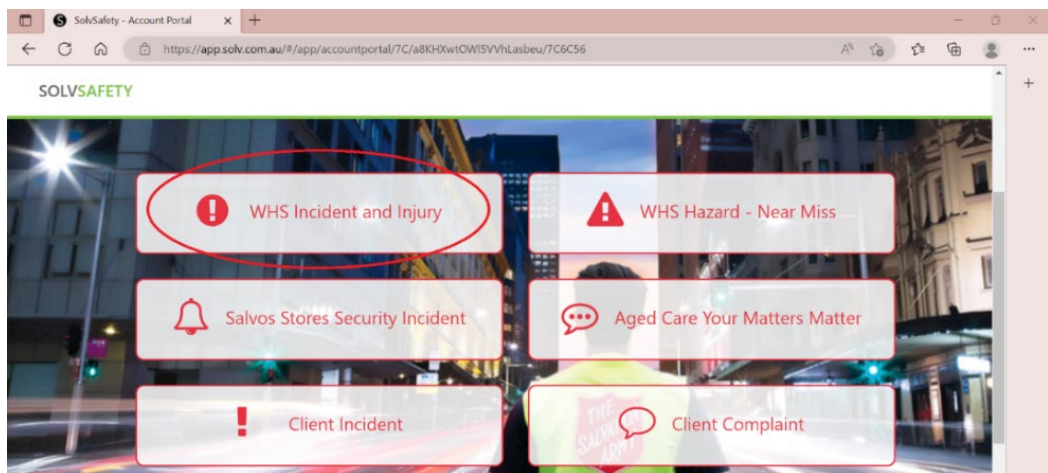
1. On Salvos Central go to 'Applications' and choose 'SolvSafety' in the dropdown option



2. SolvSafety will open in a new window and click on 'WHS Incident and Injury' OR go down the main page of SolvSafety and select 'WHS Incident and Injury'.



OR:



- When the report opens begin entering all relevant details. Select the most appropriate option in the dropdown list under 'Client Involvement Type' according to the situation you are reporting on  
For example: community member to client, TSA personnel to client
- Make sure to select 'Social Mission' under 'Mission/Stream'

**1. Incident Details**

Date of Incident \*

Client Involvement Type \*

Originally reported as a complaint?

**Incident Categorisation**

In the selector below, choose your appropriate Mission/Stream to bring up the relevant Incident Categorisation Table.

Mission/Stream \*

Social Mission

**Incident Categorisation Table**

Mandatory notifications (phone or face to face) followed by an email notification are required for Category 1 Incident. Refer to GO\_QA\_PRO-01\_TCIM\_Incident Management Procedure

Incident Group \*

Did the incident result in

- If unsure about the categorization of your incident refer to the 'Incident Categorisation Table' which is highlighted green found underneath Social Mission (shown above). The table will then open in a new window

Incident Categorisation Table Social Mission

Accessibility Mode Immersive Reader Open in Desktop App

**THE SALVATION ARMY**

**Self-Social Mission Incident Categorisation Table**

The table below is for incidents that are related to The Salvation Army clients. Example of clients include participants, community members, residents, tenants, job seekers, customers, beneficiaries, and supporters.  
For definition of common terms: [Glossary of Terms and Definitions](#) available in TSA Policy Hub.

Incident Group	Incident Types and Categories		
	Category 1	Category 2	Category 3
Client/participant behaviour	<b>Hospital admission</b> <i>(e.g. a serious illness or injury that requires</i>	<b>Medical attention</b> <i>(e.g. Treatment provided in/by Hospital Emergency Department, ambulance, unplanned GP/health centre</i>	<ul style="list-style-type: none"> <li>Aggression-verbal abuse, offensive behaviour</li> <li>Inappropriate sexual</li> </ul>

- When the appropriate 'Incident Group' and 'Incident Type' is selected the 'Incident Category' on a scale of 1-3 will be pre-selected. If you believe that the categorization is incorrect, check the Incident Categorisation Table for clarification or speak to a Safety Officer that is on your campus or the principal.
  - For all Category 1 incidents, you must also contact your line manager directly and inform them about the incident. All child safety concerns that are classed as Category 1 must go directly to Helen Boardman (Principal), Stuart Glover (TSA ISAG Director) or Natalee O'Brien (National Youth Manager)



**Incident Categorisation**

In the selector below, choose your appropriate Mission/Stream to bring up the relevant Incident Categorisation Table.

Mission/Stream \*  
Social Mission

Incident Categorisation Table

Mandatory notifications (phone or face to face) followed by an email notification are required for Category 1 Incident. Refer to GO\_QA\_PRO-01\_TCIM\_Incident Management Procedure

Incident Group \*  
Family and Domestic Violence; Child abuse

Incident Type \*  
Child abuse or abuse of unborn child

Incident Category  
1 2 3

For Category 2 and 3 incidents there may be additional notifications required. Refer to GO\_QA\_PRO-01\_TCIM\_Incident Management Procedure

**Incident Categorisation**

In the selector below, choose your appropriate Mission/Stream to bring up the relevant Incident Categorisation Table.

Mission/Stream \*  
Social Mission

Incident Categorisation Table

Mandatory notifications (phone or face to face) followed by an email notification are required for Category 1 Incident. Refer to GO\_QA\_PRO-01\_TCIM\_Incident Management Procedure

Incident Group \*  
Failure to Report/Remove Risk

Incident Type \*  
External reporting failure

Incident Category  
1 2 3

**IMPORTANT: For Category 1 Incidents you MUST also contact your manager directly (e.g. in person, phone) to advise them that an incident has occurred.**

7. Ensure you have selected the appropriate site/campus:

**2. TSA Site/Service**

Site or Service the incident relates to \*  
Youth Outreach Service Lawnton

Youth > Queenstons

Enter the physical location of where the incident occurred or the service type/program that was provided at the time of the incident or incident disclosure from the drop-down list available. Enter any specific details (include short description of the location) and address of the location in the Additional Information field.

Incident Occurred Off Site (non TSA location)

Site not listed  
In very rare cases the Site/Service may be missing. Check this box if this is the case (after making sure that you are looking under the correct part of the organisational structure).

Additional Information

- Youth Outreach Service YOS Lawnton
- Youth Outreach Service YOS Lawnton (Riverview)

- Complete and fill out the remainder of the report on SolvSafety and check all necessary and relevant options where appropriate

**7. Incident Owner**

Enter the details of the initial incident owner. This will be your line manager (Site/Service/Program/Operations Manager or Corps Officer). This person will be emailed the Incident details on save.

Incident Owner \*  
Team THQ, CI

Owner not listed  
In rare cases a line manager's information may not yet have been added to the system. Check the box if this is the case.

Serious incident where TSA personnel is the alleged person and/or owner conflict of interest \*  
Yes No

If TSA personnel is the alleged person and/or there is a conflict of interest in assigning the line manager or owner, select Yes above and assign ownership to the CI team.

Please ensure that all details are correct and complete. Once this incident has been submitted, only the assigned owner can make changes. Any changes are to be directed to the Incident owner e.g. via email. If you intend to save this record as a draft AND you have selected a Site/Service that is not your own, then note you will not be able to view/re-locate the record.

Line managers and Safeguarding Consultants must be advised of all alleged or actual incidents of child abuse, including child sexual abuse, and including if the alleged person is a member of TSA and/or a congregation member (i.e. adherent/soldier)

Save and Finish Cancel

- Ensure that the 'Incident Owner' is your relevant line manager as they will be emailed the incident details
- As you finalise the report there is a reminder at the bottom of the page that all incidents involving child abuse must be reported to either your Line Manager, the Principal and any other relevant Safeguarding Consultants or TSA staff.
- Save and Finish the report

\*Please review our TSA Child Protection Policy v9.6 for further information. Link: [TSA Independent Schools - Finalised Policies and Procedures - All Documents \(sharepoint.com\)](#)

## Helpful Links

- Independent Schools Queensland's [Child Protection Decision Support Trees](#)
- Department of Child Safety, Seniors and Disability Services [Child Protection Guide](#) resource
- [Blue Card Services resources](#)

## Appendices

- Appendix 1 – Summary of Reporting Harm

## Appendix 1

### Summary of Reporting Harm

WHO	ABUSE TYPE	TEST	REPORT TO	LEGISLATION
ALL staff	Sexual	Awareness of reasonable suspicion Sexually abused or likely to be sexually abused	Principal: Helen Boardman or Director TSA Independent Schools Advisory Group (ISAG): Greg Morgan Through to Police immediately	EGPA, sections 366 and 366A
Teacher	Sexual and Physical	Significant harm; and Parent may not be willing and able	Confer with Principal, Helen Boardman, report to Child Safety	CPA, sections 13E and 13G
ALL staff	Physical, psychological, emotional, neglect and exploitation	Significant harm; and Parent may not be willing and able	Principal, Helen Boardman, through to Child Safety	Accreditation Regulations, section 16
ALL staff	Any	Not of a level otherwise reportable to Child Safety, refer with consent	Principal, Helen Boardman, through to Family and Child Connect	CPA, sections 13B and 149M
Principal	Any	Not of a level otherwise reportable to Child Safety, refer with consent	Family and Child Connect	CPA, sections 13B and 149M
Any member of the public	Any	Significant harm; and Parent may not be willing and able	Child Safety	CPA, section 13A
Any adult*	A child sexual offence against a child by another adult	Reasonable belief and, at the relevant time, the child is or was; <ul style="list-style-type: none"> <li>- Under 16 years; or</li> <li>- A person with an impairment of the mind</li> </ul>	Police	Criminal Code section 229BC
Employing authorities	Harm or likely harm due to conduct of a teacher	When you start dealing with an allegation; and When you finish dealing with an allegation	Queensland College of Teachers	QCT, section 76 and 77

\* Any adult includes students 18 years and over, parents, guardians, and volunteers.

\* This obligation is fulfilled if the adult has already reported the information under any of the previous provisions or believes on reasonable grounds that another person has done or will do so.