



Saint Stephen's College
CRICOS Provider Number 01938G

STUDENT SAFETY AND WELLBEING POLICY

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Introduction

Saint Stephen's College (the College) is committed to protecting its students from all aspects of harm, and has established strategies, practices, policies and procedures to uphold this public commitment.

The College takes a zero-tolerance approach to any behaviours that jeopardise student safety and wellbeing (including child abuse and reportable conduct). The College regards its student safety and wellbeing responsibilities with the utmost importance and strives to deliver an educational curriculum that promotes the College's aspiration, purpose and values of *Perseverance, Responsibility, Integrity, Diversity and Empathy*.

In addition, the College has a pastoral, moral and legal responsibility to create an inextricable connection between student safety and learning, especially in a personalised learning environment where the College discovers what motivates and inspires its students and focuses on their strengths and ambitions.

This connection will be the foundation of all decisions made, and actions taken by the College when delivering a quality education to its students. At all times, the ongoing safety and wellbeing of its students will be at the forefront of mind, and the College's paramount consideration.

The College treats seriously its reporting obligations in relation to student safety matters, including to Queensland Police, the Department of Families, Seniors, Disability Services and Child Safety through Child Safety Services Centres, the Queensland Family and Child Commission and the Queensland College of Teachers. The College recognises that whilst reporting obligations may differ depending on a person's position within the College, all staff are required to uphold the ethos of this policy by ensuring that student safety and wellbeing matters are reported internally, and externally where required.

Purpose

As such, this policy sets out how the College will meet its responsibilities and commitment to student safety and wellbeing and is a student safety and wellbeing policy made in accordance with the *Child Safe Organisations Act 2024* (Qld), and regulation 15 of the *Education (Accreditation of Non-State Schools) Regulation 2017* (Qld), to implement and comply with the Child Safe Standards.

Scope

This policy applies to all persons defined as staff and staff members as outlined in **Schedule One: Definitions**.

Overview of Student Safety and Wellbeing Policies and Documents

Document	Overview
Student Safety and Wellbeing Policy	This policy sets out the College's overarching obligations and commitment to ensuring student safety and wellbeing and summarises the College's strategies for achieving these. The policy also explains how the College's other student safety and wellbeing policies and procedures interact.
Student Safety and Wellbeing - Staff Code of Conduct	This code outlines staff behaviours which align with the College's commitment to student safety and wellbeing, and what behaviours are unacceptable.
Student Safety and Wellbeing - Raising and Responding to Concerns Policy and Procedure	This document outlines how members of the College community may raise concerns about child abuse and reportable conduct. This document sets out how the College will respond to such concerns (including by complying with the College's mandatory reporting and reportable conduct obligations).
Student Safety and Wellbeing – Recruitment, Screening and Engagement Policy and Procedure	This document outlines the College's approach to ensuring student safety and wellbeing is a paramount consideration in the College's recruitment, screening and engagement practices. In this document, recruitment extends to all talent acquisition processes for all work/s, conducted by all workers, defined as staff in the <i>Student Safety and Wellbeing Policy</i> .
Child Safe and Wellbeing Policy and Procedure – ELC	This policy and procedure set out specific responsibilities, strategies and practices relevant to the operation of the College's ELC and should be read in conjunction with the College's broader Student Safety and Wellbeing Framework.

Overarching Values and Principles

The College's approach to student safety and wellbeing is guided by a number of overarching principles and values (which are set out below) that guide the development and regular review of strategies, practices, policies and procedures to uphold our commitment to protect students from all forms of harm:

- All students at the College have a right to be safe and to feel safe.
- The safety and wellbeing of students is the College's paramount consideration.
- Student safety and wellbeing awareness is embodied, promoted and openly discussed within our College community.
- Families can participate in decisions affecting their child and they, and the College community, are engaged and informed about the College's approach to student safety and wellbeing.
- Staff have regard to a student's diverse circumstances, needs, and vulnerabilities so that they can provide support and respond to those who are vulnerable and to ensure equity is upheld in policy and practice.

Child Safe Standards

The College must implement and comply with the ten Child Safe Standards¹ as documented below:

1. Leadership and culture	Child safety and wellbeing is embedded in the College's organisational leadership, governance and culture
2. Voice of children	Children are informed about their rights, participate in decisions affecting them and are taken seriously
3. Family and community	Families and communities are informed and involved in promoting child safety and wellbeing
4. Equity and diversity	Equity is upheld and diverse needs respected in policy and practice
5. People	People working with children are suitable and supported to reflect child safety and wellbeing values in practice
6. Complaints management	Processes to respond to complaints and concerns are child focused
7. Knowledge and skills	Staff and volunteers of the entity are equipped with the knowledge, skills and awareness to keep children safe through ongoing education and training
8. Physical and online environments	Physical and online environments promote safety and wellbeing and minimise the opportunity for children to be harmed
9. Continuous improvement	Implementation of the Child Safe Standards is regularly reviewed and improved
10. Policy and procedures	Policies and procedures document how the College is safe for children

The Universal Principle

The College must provide an environment that promotes and upholds the right to cultural safety of children who are Aboriginal persons or Torres Strait Islander persons². The following eight cultural safety indicators demonstrate how the College will embed and apply cultural safety across all ten Child Safe Standards documented above:

1. Transformational unlearning	The College must challenge unconscious bias, racism, and colonial thinking within their structures and workforce
2. Negotiating values, motivations, and paradigm	Policies and programs should be co-designed with Aboriginal and Torres Strait Islander

¹ Section 11 of the *Child Safe Standards Organisations Act 2024* (Qld)

² Section 11 of the *Child Safe Organisations Act 2024* (Qld)

	communities to reflect their perspectives on child safety
3. Prioritising social and emotional wellbeing and health	A holistic, strengths-based approach must be adopted to support the wellbeing of Aboriginal and Torres Strait Islander children, staff, and families
4. Sharing power and decision-making	Decision-making processes should be led or co-led by Aboriginal and Torres Strait Islander peoples to ensure genuine partnerships
5. Sharing resources	The College should dedicate resources and funding to Aboriginal and Torres Strait Islander-led initiatives, research, and governance mechanisms
6. Creating a strategic enabling environment	Leadership must set clear priorities and accountability structures to embed cultural safety into daily operations
7. Operating on Aboriginal and Torres Strait Islander terms of reference	Service delivery should be grounded in Aboriginal and Torres Strait Islander knowledge systems and self-determination principles
8. Accountability and continuous quality improvement	Progress should be measured using Aboriginal and Torres Strait Islander-defined success indicators, ensuring sustained improvement

Statement of Commitment to Student Safety and Wellbeing

All children and young people who come to Saint Stephen's College have a right to feel and be safe. We are committed to providing a child safe and child friendly environment, where children and young people can actively participate in decisions that affect their lives. We have zero tolerance for abuse and other harm and are committed to acting in students' best interests and keeping them safe from harm. The College regards its child protection responsibilities with the utmost importance and is committed to providing the necessary resources to maintain a child safe culture, including cultural safety, and ensure compliance with all relevant child protection laws and regulations. Each member of the College community has a responsibility to understand the important and specific role that they play individually and collectively to ensure that the wellbeing and safety of all students is at the forefront of all that they do and every decision that they make.

A student safety and wellbeing culture

Creating and maintaining a student safety and wellbeing culture requires input from the entire College community. Our aim is to provide a safe environment that aligns with the College's aspiration, purpose and values.

To achieve this, we promote a progressive education model that motivates, nurtures and prepares each generation for the demands of its time.

Through our processes and practices, we also ensure that a student safety and wellbeing culture is championed and modelled at all levels of the College, from the top down to the bottom up. Accordingly, student safety and wellbeing are embedded in our College leadership, governance and culture.

We do this by setting clear expectations regarding student safety and wellbeing to our College community (including staff and students), and ensuring that at all times, our governance arrangements facilitate the implementation of this policy (including by making student safety and wellbeing a standing agenda item and reviewing the College's student safety and wellbeing processes across all levels).

Support and Engagement of All Students

The College also appreciates that a student safety and wellbeing environment looks different for every student, and in delivering this, supports and respects the cultural safety of Aboriginal and Torres Strait Islander students, students from culturally and/or linguistically diverse backgrounds, as well as students with a disability or who are otherwise vulnerable (including students who identify as LGBTIQ+ and those with challenging home situations).

The College also appreciates that a student safe environment is contingent on a culturally safe environment, which requires proactive and ongoing efforts to maintain.

Our primary focus in delivering personalised education and through decision-making, is that all students are safe, feel safe, and are able to create and develop a range of strategies and skills, which can be used flexibly to flourish in all aspects of their lives. As such, we support and encourage students to talk openly and share their views, particularly about matters that directly impact them.

The College will aim to ensure students (and their parents) are provided with the necessary skills and knowledge to understand and maintain a student's own personal safety and wellbeing:

- Understanding, identifying, discussing and reporting on student safety and wellbeing matters.
- Standards of behaviour for students attending the College.
- Healthy and respectful relationships (including those relating to gender and sexuality).
- Resilience.

The College will aim to ensure that staff are provided with the necessary skills and knowledge to understand and maintain a student and culturally safe environment, including through:

- Actively supporting and encouraging Aboriginal and Torres Strait Islander students, students from culturally and/or linguistically diverse backgrounds and their families to:
 - Express their culture and enjoy their cultural rights.
 - Facilitate participation and inclusion in all aspects of College life.
- Implementing and embedding strategies within the College community that acknowledge and appreciate the strengths of Aboriginal and Torres Strait culture and understand its

importance to the safety and wellbeing of Aboriginal and Torres Strait children and students.

- Cultural training to improve understanding and respect (particularly with regard to Aboriginal and Torres Strait Islander culture), appreciation of culturally sensitive issues, including using appropriate language when referring to individuals or communities, and to equip staff to build culturally safe environments for children and young people.
- Identifying, confronting and addressing incidences of racism seriously (noting it will not be tolerated), with the appropriate consequences and where appropriate with the involvement of Aboriginal and Torres Strait Islander students, students from culturally and/or linguistically diverse backgrounds, and their families.
- Ensuring that the College's strategies, practices, policies and procedures create a culturally safe and inclusive environment which values and respects the diverse and unique identities and experiences of Aboriginal and Torres Strait Islander children, young people and students, (including their families), as well as others from culturally and linguistically diverse backgrounds.
- Providing particular attention to the needs of students with a disability (or otherwise, additional needs), students from culturally and linguistically diverse backgrounds, international students, students who identify as LGBTIQA+ (or who are otherwise gender diverse), and those students who are unable to live at home.
- Providing particular attention to the needs of Aboriginal and Torres Strait Islander students to promote and provide a culturally safe environment for them.

The College will promote its student safety and wellbeing practices to students in ways that are readily accessible, easy to understand and user-friendly, including by:

- The appointment of Student Safety and Wellbeing Officers who champion student safety and wellbeing (see below).
- Training staff to recognise the indicators of harm to students, including harm caused by not only adults but also other children and young people, and harm in an online environment.
- Collaborating with parents to ensure that they are provided with the information necessary to maintain consistent messaging about child abuse and other student safety and wellbeing concerns.
- Encouraging students to identify safe and unsafe environments and situations (including in an online environment).
- Setting clear student safety and wellbeing standards so that staff, students and the College community are aware of the standards that are expected, and those which fall short of the College's expectations.
- Distributing child-friendly publications, including student safety and wellbeing posters.
- Clearly communicating where students can access support, make a report about safety or wellbeing concerns, or otherwise obtain information.
- Ensuring that students have identified safety and wellbeing, and support, networks to overcome any barriers that may prevent disclosure of safety or wellbeing concerns.
- Ensuring staff are trained and supported to effectively implement this policy.

Raising and Responding to Student Safety and Wellbeing Concerns

The College takes all allegations or disclosures of suspected child abuse and reportable conduct seriously and responds to such allegations and disclosures promptly and thoroughly.

All instances of suspected child abuse or reportable conduct, allegations of child abuse or reportable conduct, or student safety and wellbeing concerns and complaints, must be reported to a Student Safety and Wellbeing Officer, and will be treated very seriously and consistently according to the College's and individual staff member's internal and external reporting procedures and obligations.

The College has a *Student Safety and Wellbeing – Raising and Responding to Concerns Policy*, available on the College's website, which sets out:

- How concerns about actual and suspected child abuse and reportable conduct may be raised with the College.
- Who such concerns can be raised with at first instance (including the Principal, and the College's Student Safety and Wellbeing Officers).
- How such concerns will be dealt with by the College (including by complying with any mandatory reporting obligations, and the College's expectations of staff regarding information sharing and record keeping).
- How the College will support or assist students (and their families) who disclose such concerns, or who are otherwise linked to such concerns.
- The College's procedure for addressing concerns raised by staff or members of the college community about non-compliance with the College's student safety and wellbeing processes. This includes how such concerns may be raised and with whom, and how they will be addressed, in accordance with section 16(5) of the *Education (Accreditation of Non-State Schools) Regulation 2017* (Qld).

The College will ensure that the procedures contained in the *Student Safety and Wellbeing – Raising and Responding to Concerns Policy* are student-focused, and can be easily understood by the College community, in particular students.

If College staff believe a student is at immediate risk of child abuse, they must phone 000.

Other concerns may be raised by members of the College community in accordance with the College's *Complaints Resolution Policy and Procedure*.

Reporting a Sexual Offence: Failure to Report or Protect Offence

Failure by a person to report and/or protect a child under the age of 16 or a person with an impairment of the mind from child sexual abuse is also an offence under section 229BB and section 229BC of the *Criminal Code Act 1899* (Qld).

This applies where there is significant risk that a child under the care, supervision or control of the College will become a victim of a sexual offence by an adult associated with the College.

The person may be guilty of an offence if they know of the risk of abuse and have the power or responsibility to reduce or remove the risk, but wilfully or negligently fail to do so.

The offence requires an associated person of the College to reduce or remove a 'significant' risk. It is not a criminal offence to fail to eliminate every possible risk that a sexual offence may be committed against a child. However, there are a number of factors to assist associated persons in identifying risks which amount to 'significant' risks. These include:

- The likelihood or probability that the child will become the victim of a sexual offence.
- The nature of the relationships between a child and the adult who may pose a risk to the child.
- The background of the adult who may pose a risk to the child, including any past or alleged misconduct.
- Any vulnerabilities particular to a child, which may increase the likelihood that they may become the victim of a sexual offence.
- Any other relevant fact which may indicate a significant risk of a sexual offence being committed against a child.

Student Safety and Wellbeing Employment Practices

The College believes that the safety and wellbeing of students is dependent on the existence of a student safe culture. Establishing that culture requires effective staff recruitment, supervision and management practices.

All positions at the College that involve student-connected work will have a position description or similar, which clearly sets out:

- The position's requirements, duties and responsibilities regarding student safety and wellbeing.
- The applicant's essential or relevant qualifications, experience and attributes in relation to education and student safety and wellbeing.
- The College's values and commitment in respect of student safety and wellbeing.
- How the College will support those who make disclosures.

Student safety and wellbeing is a paramount consideration during the recruitment process. All staff working with children and young people must be suitable and reflect the College's values and commitment to student safety and wellbeing in practice.

The College assesses the suitability of staff to undertake student-connected work through screening (including identity checks), qualification verifications, values-based interviews, work history checks and referee checks.

All prospective staff will be informed about the College's student safety and wellbeing practices (including but not limited to this policy, the *Student Safety and Wellbeing - Staff Code of Conduct*,

the College's and individual staff member's record keeping, information sharing and reporting obligations) and be subject to student safety and wellbeing screening in accordance with the College's obligations under legislation.

A successful applicant cannot commence at the College until written clearance in respect of student safety and wellbeing screening is obtained. A current QCT registration or Blue Card (or equivalent) must be sighted and verified by the College and appropriately recorded before staff can engage in student-connected work.

Appropriate and mandatory induction regarding the College's student safety and wellbeing practices (including policies and procedures) will follow any successful appointment or engagement.

The College requires that staff act professionally, and in a way that embodies the College's public commitment to student safety and wellbeing throughout their time at the College. The College has a *Student Safety and Wellbeing - Staff Code of Conduct*, available on the College's website, which provides guidelines for staff on expected behavioural standards and responsibilities, and sets out examples of appropriate and inappropriate behaviours. The College will take appropriate disciplinary action where a staff member is found to have acted contrary to that Code, or the College's other policies and procedures regarding appropriate standards of behaviour.

At least annually, the College will ensure that appropriate guidance and training is provided to relevant staff (including the Board) engaged in student-connected work about:

- Individual and collective obligations and responsibilities for identifying and managing the risk of child abuse and reportable conduct.
- Child abuse and reportable conduct risks in the College environment (including the online environment).
- The College's current student safety and wellbeing standards and practices.
- The Director of Risk and Compliance is responsible for taking reasonable steps to ensure all staff complete the College's mandatory student safety and wellbeing training modules and briefings.

The College will ensure that privacy and employment law obligations are met when responding to student concerns and complaints.

Staff will otherwise be subject to regular supervision, training and periodic student safety and wellbeing checks, including to ensure their ongoing suitability for student-connected work.

Student Safety and Wellbeing Officers

The College has appointed Student Safety and Wellbeing Officers as a first point of contact to provide advice and support to students, parents, and staff regarding the safety and wellbeing of students at the College.

The following Student Safety and Wellbeing Officers may be contacted to provide advice and support:

Name	Position	Contact details
Michael Kleidon	Principal	principalsoffice@ssc.qld.edu.au
Sam Holmes	Executive Director of International Education	exec.intl@ssc.qld.edu.au
Dane Oman	Dean of Senior Students	dean.senior@ssc.qld.edu.au
Leith Biggs	Head of Junior College	head.junior@ssc.qld.edu.au
Rachael Egerton	Director of Early Learning Centre	dir.elc@ssc.qld.edu.au
Student Safety and Wellbeing Officers can also be contacted via Reception on 07 5573 8600.		

Student Safety and Wellbeing Officers are able to act as a source of support, advice and expertise to staff on matters of student safety and wellbeing.

Staff are encouraged to speak with one of the Student Safety and Wellbeing Officers should they hold any concerns relating to student safety and wellbeing and liaise with the Principal to maintain the visibility of student safety and wellbeing.

Staff, students and parents can contact the Student Safety and Wellbeing Officers for further information regarding student safety and wellbeing, and for any questions or concerns or reports of suspected or alleged child abuse or reportable conduct.

Risk Management

The College will develop and implement risk management strategies regarding student safety and wellbeing, both online and in the physical College environment without compromising a student's right to privacy, access to information, social connections and learning opportunities.

These strategies will identify, control, remove and otherwise focus on preventing and reducing, the risk(s) of child abuse, reportable conduct and otherwise, risks to student safety and wellbeing by taking into account the nature of the environment, the activities expected to be conducted in that environment (including the provision of services by contractors or outside organisations), and the characteristics and needs of all students expected to be present in that environment.

In addition, these strategies will place a positive responsibility on ensuring that student safety and wellbeing is actively promoted at the College.

Where the College identifies risks of actual or suspected child abuse or reportable conduct occurring in the online or physical College environment, it will make a written record of those risks and determine the action(s) it will take to remove or otherwise reduce the risks (risk controls and risk treatments).

The College will monitor, review and evaluate the effectiveness of the implementation of its risk controls and risk treatments annually, and update these where required.

The College will ensure it creates, maintains and disposes of any records about student safety and wellbeing in line with applicable recordkeeping requirements, including minimum retention periods regarding these obligations. In addition, the College will detail its information sharing and record-keeping processes and ensure all staff (including volunteers) understand their relevant obligations.

Student Participation and Empowerment

The College recognises that a student safe culture is also contingent upon the participation and empowerment of students themselves.

Consistent with this understanding, the College will ensure:

- That students are informed about all of their rights, including to safety, information and participation (for example, those in the United Nations Convention on the Rights of the Child).
- That the importance of friendships is recognised and support from peers is encouraged to help students feel safe and be less isolated.
- Where relevant, that students are offered access to child abuse (including sexual abuse and reportable conduct) prevention programs in an age-appropriate way.
- Staff are attuned to the signs of harm (including that caused by child abuse and reportable conduct) and facilitate child-friendly ways for students to express their views, participate in decision making and raise their concerns.
- The College has strategies and curriculum planning documents in place to develop a culture that facilitates participation and is responsive to the input of students.
- The College provides opportunities for students to participate and is responsive to their contributions, thereby strengthening confidence and engagement.

Reflection and Continuous Improvement

The College is committed to continual improvement that is responsive to emerging thinking, evidence and practice, so as to eliminate (where practicable) the possibility of student safety and wellbeing risks occurring in the first place. Where the College can improve, it will strive to do so. The College will report on the outcomes of any relevant review to the College community.

Student Safety and Wellbeing Responsibilities

Society as a whole shares responsibility for promoting the safety and protection of students from child abuse and reportable conduct. In the College context, all members of the College community have a role to play.

However, specific responsibilities in respect of student safety and wellbeing are assigned to:

- The Board.
- The Principal.

- The College Senior Leadership Team.
- Student Safeguarding Committee.
- Student Safety and Wellbeing Officers.
- Staff.
- Students and Parents/guardians.

For further information, please refer to **Schedule Two: Student Safety and Wellbeing Responsibilities**.

Breach of this Policy

The College emphasises the need for staff to fully comply with the requirements of this policy.

Staff found to be in breach of the requirements of this policy may be subject to disciplinary action, up to and including termination of employment or engagement (as the case may be). Breaches may also result in notifications to appropriate authorities and/or the Police.

Communication and Implementation

The College Board is responsible for ensuring:

- The College's staff and students, and students' parents and guardians, are made aware of the College's student safety and wellbeing policies and practices;
- Staff are trained annually in implementing the College's student safety and wellbeing policies and practices;
- The College implements the processes;
- The processes are readily accessible by staff, students, parents and guardians.

The College complies with these obligations by:

- Making this policy publicly available on the College's website.
- Making this policy available to staff as part of the College's and the Board's internal policies and procedures. Aspects of, and updates to, the College's Student Safety and Wellbeing Framework, including this policy, will be addressed in the College's professional development updates, training programs and newsletters.

To comply with these obligations:

- The Board and Principal will review this policy and the College's child safety and wellbeing practices at least every two years (or more frequently, including in response to legislative amendments, a significant incident, changes to the College's internal procedures or practices, or otherwise as requested by the Principal) and implement improvements where applicable.
- Families and members of the College community will be provided with opportunities to give feedback on this policy and the broader Student Safety and Wellbeing Framework, via appropriate feedback mechanisms made available from time to time. This feedback will

inform the College's ongoing review, development and continuous improvement of its policies, procedures and practices.

- The Principal is responsible for monitoring staff compliance with this policy.
- All staff must ensure that they abide by this policy and assist the College in implementing this policy.

Schedule One: Definitions

Term	Definition
Behaviour that causes emotional or psychological harm to a child	includes sexual offences, sexual misconduct, physical violence and significant neglect. However, other types of behaviours can also cause emotional or psychological harm including, for example, severe or sustained instances of verbal abuse; coercive or manipulative behaviour; hostility towards, or rejection of, a child; and humiliation, belittling or scapegoating.
Child	means a child under the age of 18 years, except in the case of certain mandatory reporting obligations which may define a child to be under a different age.
Child abuse	means all forms of child abuse and includes: • Any act committed against a child involving a sexual offence or grooming. The infliction on a child, of physical violence or serious emotional or psychological harm. • Serious neglect of a child.
Child in need of protection	means a child who has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and does not have a parent able and willing to protect the child from the harm.
College	means Saint Stephen's College.
College community	means all those who are directly and indirectly involved with the College, including students, parents, carers and alumni, as well as businesses, charitable organisations and locals that are affiliated with the College.
College Senior Leadership Team	refers to the Principal, Business Manager, Executive Director of International Education, Dean of Teaching and Learning, Dean of Senior Students, Dean of Operations and Development and Head of Junior College.
CP Act	means the <i>Child Protection Act 1999</i> (Qld), as amended from time to time.
CSO Act	means the <i>Child Safe Organisations Act 2024</i> (Qld), as amended from time to time.
Educational Services Contractor	means a person engaged by the College on a contract for services basis, rather than as an employee, to provide educational, instructional, coaching, tutoring, training or learning support services to students.
Grooming	is defined in the <i>Criminal Code Act 1899</i> (Qld) and refers to conduct in relation to a child, or a person who has care of a child, with intent to facilitate the procurement of the child to engage in a sexual act, or expose, without legitimate reason, the child to any indecent matter. Grooming may be identified by attempts being made at establishing an intimate relationship with befriending or influencing a child (or, in some circumstances, members of the child's family). In this respect, grooming involves psychological manipulation that is usually very subtle, drawn out, calculated, controlling and premeditated.
Harm	means any detrimental effect of a significant nature on a child's physical, psychological, or emotional wellbeing.

	It is immaterial how the harm is caused. It may be caused by physical, psychological, or emotional abuse or neglect, or sexual abuse or exploitation. Harm may occur as a single act, omission or circumstance, or through a series or combination of acts, omissions, or circumstances.
Hosted Guest	means an individual invited or permitted by the College to attend College premises, or a College activity or event, for a short-term, specific and incidental purpose, such as a prospective parent or family attending a College tour prior to enrolment, an invited guest participating in an awards ceremony, ANZAC Day commemoration or other special event, or a member of parliament or government representative attending in an official or representative capacity. A Hosted Guest does not perform work or provide services for, or on behalf of, the College and does not include a Volunteer, Trade Contractor, Consultant, Subcontractor, Third Party Provider On-site, Third Party Provider Off-site, Educational Services Contractor or a person or organisation using College facilities under a Venue Hire Arrangement.
Mandatory reporter	has the meaning given to 'relevant person' by section 13E of the CP Act. It includes but is not limited to registered nurses, teachers, early childhood education and care professionals and any other person referred to in section 13F of the CP Act.
Neglect	refers to an individual's failure to meet the basic needs of the child that is deliberate or reckless, and can include: • Supervisory neglect, which is the absence of appropriate supervision that poses a risk to the safety and wellbeing of a child or young person, with regards to factors relating to the child. • Physical neglect, which is the failure to meet a child's physical needs including the provision of adequate and appropriate food, clothing, shelter or physical hygiene needs. • Educational neglect, which is the failure to ensure that a child's formal educational needs are being met. • Emotional neglect, which is the failure to provide adequate nurturing, encouragement and support to a child.
Parent	includes a guardian or carer, and 'parents' has a corresponding meaning.
Physical violence	means: (i) The intentional or reckless application of physical force to a person without lawful justification or excuse; or (ii) An act that intentionally or recklessly causes a person to anticipate immediate and unlawful violence to the person; but Does not include the application of trivial, negligible or insignificant physical force to a person.
QCT	means the Queensland College of Teachers.
QFCC	means the Queensland Family and Child Commission.
Reasonable belief	means a fair-minded and ordinary person, with the same information, would believe the conduct may have occurred. There must be some objective basis for the belief.

	However, it is not necessary to have proof to form a reasonable belief, nor do you need to make a judgement about the truth of an allegation. However, a reasonable belief is more than suspicion, mere rumour or speculation. For example, a ‘reasonable belief’ about a sexual offence might be formed when: • A student states that they have been sexually abused. • A student states that they know someone who has been sexually abused (because sometimes the student may be talking about themselves). • Someone who knows a student states that the student has been sexually abused. • Professional observations of the student’s behaviour or development leads a professional to form a belief that the student has been sexually abused. • Signs of sexual abuse lead to a belief that the student has been sexually abused. It is permissible to ask a person raising a concern with you, sufficient questions to establish a reasonable belief. However, care should be taken not to ask the person any suggestive or leading questions. Staff who are not sure whether they have a reasonable belief must consult with a SSWO.
Reportable allegation	means an allegation or other information that leads a person to form a reasonable belief that a worker of the College has committed: • reportable conduct; or • misconduct that may involve reportable conduct. For this definition, it is irrelevant whether the conduct or misconduct is alleged to have occurred in the course of the worker performing work for the College.
Reportable conduct	means: • 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.

Reportable conviction	means a conviction for an offence committed by a worker against a law of a State or the Commonwealth that may involve reportable conduct. A conviction includes: • A finding of guilt, and the acceptance of a plea of guilty, by a court, whether or not a conviction is recorded. • A spent conviction, or a conviction that has become spent under a law of another State or the Commonwealth.
Reportable suspicion	(for the mandatory reporting regime) means a suspicion formed on reasonable grounds that a child: • Has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse. • May not have a parent able and willing to protect the child from the harm.
Restricted Person	means a person who— • holds a negative notice; or • holds a working with children authority that is suspended; or • is a disqualified person and does not hold a working with children authority; or • has been charged with a disqualifying offence the proceeding for which has not ended; or • is the subject of an adverse interstate Working with Children (WCC) decision that is in effect.
Sexual misconduct	means conduct that is sexual in nature, other than conduct that constitutes a child sexual offence. Examples of conduct that may be sexual misconduct include behaviour, physical contact or speech or other communication of a sexual nature (including inappropriate touching, grooming behaviour and voyeurism). Other examples of sexual misconduct include: • Developing an intimate relationship with a student, for example, through regular contact with the student without the knowledge or approval of the College; • Inappropriately discussing sex and sexuality with a student; or • Other overtly sexual acts that could lead to the College taking disciplinary or other action.
Sexual offence	means: (a) a child sexual offence under section 207A of the <i>Criminal Code Act 1899</i> (Qld); (b) an offence of a sexual nature committed in the presence of a child; (c) an act or omission committed outside Queensland that would be an offence mentioned in (a) or (b) if it were committed in Queensland. Sexual offences include sexual assault (including rape and attempted rape), indecent acts, possession of child abuse material, exposure to pornography, and grooming.

	Any sexual activity between a child and an adult can be a sexual offence. In certain circumstances, sexual activity between children can also be a sexual offence, and also between two adults (particularly when one is a student).
Significant	in relation to harm or neglect, means that the harm is more than trivial or insignificant, but need not be as high as serious and need not have a lasting permanent effect.
Staff and Staff members	include Board members, the Principal, employees, volunteers, contractors, and other authorised personnel required to perform functions on the College's premises, or at College-organised activities and events.
Student or Students	means a child under 18 years of age, and any student at the College over 18 years of age (or involved in student-connected work), and 'students' has a corresponding meaning.
Student-connected work	means work authorised by the College and performed by an adult in a College environment (either on-campus, off-campus or remotely) while children or young people are present or reasonably expected to be present.
SSWO	means Student Safety and Wellbeing Officer.
Third Party Provider Off-site	means an external person, organisation or business engaged or approved by the College to deliver student-related programs, activities or services to students at premises, facilities or environments that are not owned, operated or controlled by the College.
Third Party Provider On-site	means an external person, organisation or business engaged or approved by the College to deliver student-related programs, activities or services to students on College premises or in another College-controlled environment.
Trade Contractor, Consultant or Subcontractor	means an individual or entity engaged to provide trade, technical, professional, advisory, maintenance, construction, repair, operational or specialist services to or for the College, whether engaged directly by the College or indirectly through another contractor or consultant, but does not include an Educational Services Contractor, Third Party Provider, Hosted Guest, Volunteer or Venue Hire Arrangement.
Venue hire arrangements	means arrangements under which an external person, organisation or business hires or uses College facilities to conduct its own activities, services, programs or business purposes, rather than to perform work or provide services for, or on behalf of, the College.
Victimisation	means treating a person unfairly or unreasonably because they, or someone associated with them, has made, or intends to raise a concern about student safety or student wellbeing, or who is otherwise involved or participates in the College's, or an external body's investigation of the concern.
Volunteer	means a person who performs work or provides services for, or on behalf of, the College without financial reward, noting that financial reward does not include reimbursement of out-of-pocket expenses.
Working with Children Checks (WCCC)	means a mandatory child-related employment screening undertaken to comply with the Working with Children Check Act 2000 (Qld). This may include a blue card, exemption card, QCT/AHPRA registration, and/or restricted person declaration form.

Schedule Two: Student Safety and Wellbeing Responsibilities

Society as a whole shares responsibility for promoting the safety and protection of students from child abuse and reportable conduct. In the College context, all members of the College community have a role to play.

However, specific responsibilities in respect of student safety and wellbeing are assigned to the following roles:

College Board

The College Board is the governing body for the legal entity which operates the College, and as such is ultimately responsible for ensuring that student safety and wellbeing (and in particular the care, safety and welfare of children and young people) is the College's paramount consideration.

Without limiting that responsibility, the College Board:

- Acquires guidance and information on student safety and wellbeing matters, and keeps up-to-date with its student safety and wellbeing obligations through engaging in professional development.
- Satisfies itself that the College has strategies (reflected through policies, procedures, words and actions) to embed a culture of student safety and wellbeing in the governance, operations and culture of the College.
- Delegates roles and responsibilities to the Principal, for achieving the College's student safety and wellbeing strategies.
- Satisfies itself that the Principal has allocated appropriate roles and responsibilities to the College Senior Leadership Team, and to staff, for achieving the College's student safety and wellbeing strategies.
- Satisfies itself that the College community is engaged and informed about the College's student safety and wellbeing strategies, and allocation of roles and responsibilities.
- Ensures that the College, and in particular the Principal, has adequate resources and support to achieve the College's student safety and wellbeing strategies.
- Keeps the Principal and, via the Principal, all staff accountable for achieving the College's student safety and wellbeing strategies, sharing relevant information and ensuring adequate recordkeeping in accordance with applicable recordkeeping requirements.
- Periodically reviews the effectiveness of the College's student safety and wellbeing strategies in practice (including by, if considered appropriate, revising those strategies).
- Ensures that student safety and wellbeing remains a regular Board agenda item for review, reflection and discussion as well as ensuring that the College reports on the outcomes of any relevant review to the College community.
- Oversees the College's compliance with privacy and employment law obligations in the management of, and response to, student concerns and complaints.

The Principal

In accordance with good governance, the College Board delegates responsibility for the day-to-day operation of the College – and in particular the care, safety, wellbeing and welfare of students – to the Principal.

The Principal is therefore responsible at a day-to-day level, and accountable to the Board, for taking all practical measures to ensure that:

- The College has a student safety and cultural safety culture (including in the online environment), and that this is promoted within the College environment – such as at assemblies and on posters in visible locations.
- The College's student safety and wellbeing strategies are achieved, both in policy and in practice.
- The College's student safety and wellbeing policies are communicated to parents, students and families, and that input is sought from them regarding policy development and review, and that the processes contained within are understood and culturally safe.
- Staff are enabled, prepared and supported when managing student safety and wellbeing complaints, including in their support of the student(s) involved (and, where appropriate, their families).
- Staff are educated about, and comply with, their professional and statutory responsibilities regarding student safety and wellbeing.
- Staff are enabled, prepared and supported in identifying the risks to student safety and wellbeing, noting that indicators of harm may vary depending on the differences and needs of the student.
- Staff are enabled, prepared and supported to create, maintain and dispose of records about student safety and wellbeing in line with applicable recordkeeping requirements.
- Staff champion and model compliance with student safety and wellbeing policies and procedures.
- Concerns about student safety and wellbeing are dealt with seriously, promptly and thoroughly, and in accordance with the College's policies and procedures and any statutory obligations, and that the College co-operates with law enforcement agencies and relevant authorities as required.
- The Board receives timely reports regarding student safety and wellbeing concerns and risks, or any developments regarding the College's student safety and wellbeing obligations.

The College Senior Leadership Team

The College Senior Leadership Team is committed to 'leading from the front' and engaging in a preventative, proactive and participatory approach to student safety and wellbeing issues.

Where appropriate, delegated members of the College Senior Leadership Team will assist the Principal with discharging the student safety and wellbeing responsibilities outlined in this document, and as otherwise required by legislation and good practice.

Student Safeguarding Committee

The Student Safeguarding Committee provides oversight and operational direction for the College's Student Safety and Wellbeing Framework. The Committee comprises members from a number of operational areas to ensure a broad perspective on safeguarding issues. It is responsible for monitoring compliance with child safety obligations, reviewing and updating policies and procedures, and evaluating the effectiveness of safeguarding initiatives. The Committee also supports ongoing education, training, and consultation with the College community to strengthen child safety culture and ensure continuous improvement.

Student Safety and Wellbeing Officers

Key responsibilities for the College's Student Safety and Wellbeing Officers include:

- Having a good working knowledge and appreciation of the College's Student Safety and Wellbeing Framework.
- Without replacing any legal reporting obligations a person may have, supporting the Principal in promptly managing the College's response to an allegation of actual or suspected child abuse or reportable conduct, and ensuring that the allegation is taken seriously and responded to appropriately and thoroughly.
- Ensuring the College's student safety and wellbeing strategies are clearly and regularly communicated to staff, students and other members of the College community.
- Ensuring the College's student safety and wellbeing strategies are being implemented effectively and are strengthened where required.
- Ensuring a strong and sustainable student safety and wellbeing culture is embedded within the College.

Staff

All staff are required to comply with the College's Student Safety and Wellbeing Framework (including in particular this policy, *Student Safety and Wellbeing Policy*), as well as their legal and professional obligations with respect to the prevention and reporting of actual or suspected child abuse and reportable conduct.

It is each such staff member's individual responsibility to be aware of key risk indicators of child abuse or reportable conduct, to be observant, and to raise any concerns they may have with one of the Principal, the College Senior Leadership Team, the College's Student Safety and Wellbeing Officers (and/or with external agencies, where required). In this regard, staff are encouraged to voice their concerns, no matter how minor, trivial or insignificant.

All contractors and volunteers involved in student-connected work are required to adhere to this policy and the Student Safety and Wellbeing - Staff Code of Conduct and are responsible for contributing to the safety and wellbeing of students in the College environment. They too have obligations with respect to the reporting of actual or suspected child abuse or reportable conduct. Again, it is the College's expectation that contractors and volunteers are attuned to their individual responsibilities and act in accordance with their internal and external reporting obligations, and the College's policies and procedures.

Source of obligation

Child Safe Organisations Act 2024 (Qld)

Child Protection Act 1999 (Qld)

Criminal Code Act 1899 (Qld)

Disability Discrimination Act 1992 (Cth)

Education (Accreditation of Non-State Schools) Act 2017 (Qld) and associated regulation

Education (General Provisions) Act 2006 (Qld) and associated regulation

Education (Queensland College of Teachers) Act 2005 (Qld)

Education and Care Services National Law (Queensland) and associated regulation

Education and Care Services Act 2013 (Qld)

Working with Children Check Act 2000 (Qld)

Public Records Act 2023 (Qld)

National Quality Framework

Code of Ethics for Teachers in Queensland

Related policies and procedures

Saint Stephen's College Strategy: Aspirations towards 2034

Saint Stephen's College Statement of Commitment to Student Safety and Wellbeing

Saint Stephen's College Student Safety and Wellbeing - Staff Code of Conduct

Saint Stephen's College Student Safety and Wellbeing - Raising and Responding to Concerns
Policy and Procedure

Saint Stephen's College Student Safety and Wellbeing – Recruitment, Screening and Engagement
Policy and Procedure

Saint Stephen's College Student Code of Conduct

Saint Stephen's College Staff Code of Conduct

Saint Stephen's College Parent Code of Conduct

Saint Stephen's College Complaints Resolution Policy and Procedure

Saint Stephen's College Drugs, Alcohol and Smoking Policy

Saint Stephen's College Risk Management Framework

Saint Stephen's College Student Disability Discrimination Policy and Procedure

Saint Stephen's College Privacy Policy

Saint Stephen's College Records Management Policy

Saint Stephen's College Staff as Parent Policy

Saint Stephen's College The Service of Alcohol at Saint Stephen's College

Saint Stephen's College Work Health and Safety Policy

Related documents

Saint Stephen's College Operational Risk Register

Saint Stephen's College Register of College Student Safety and Wellbeing Officers

Saint Stephen's College Central Register

Saint Stephen's College Worker Register

Saint Stephen's College Reporting a Concern Form

Saint Stephen's College Staff Referral Form

Saint Stephen's College Training Matrix

References

[Laws targeting sexual offences against children | Queensland Government](#)

[Child Protection Guide | Department of Families, Seniors, Disability Services and Child Safety](#)

[Reporting and referring concerns | Department of Families, Seniors, Disability Services and Child Safety](#)

[Children and young people in care | Department of Families, Seniors, Disability Services and Child Safety](#)

[Child Protection Guide | Department of Child Safety, Youth and Women](#)

Australian Human Rights Commission National Principles for Child Safe Organisations

United Nations Convention on the Rights of a Child

Australian Society of Archivists: Records Retention Schedule for Non-Government Schools, 2nd Edition

Document history

Version	Date	Author	Amendments
1.1	June 2026	Content provided by Russell Kennedy (Contextualisation and formatting by the College's Director of Risk and Compliance)	Updates to reflect the introduction of the Reportable Conduct Scheme.
1.0	November 2025	Content provided by Russell Kennedy (Contextualisation and formatting by the College's Director of Risk and Compliance)	First version of document.