



# Saint Stephen's College

## CHILD 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). The College regards its student safety and wellbeing responsibilities with the utmost importance as it delivers a Christian educational program curriculum that promotes the College's 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

This policy sets out how the College will meet its responsibilities and commitment to child safety and wellbeing, and is a child safety and wellbeing policy made in accordance with the child safe standards and regulation 16 of the *Education (Accreditation of Non-State Schools) Regulation 2017* (Qld).

## Scope

This policy applies to all 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. Collectively, these individuals are referred to as 'staff'.

This policy extends to any other person who is engaged in work at the College (whether supervised or not).

## Overview of Child Safety and Wellbeing Framework

Document	Overview
Child 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.
Child 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.
Child Safety and Wellbeing - Raising and Responding to Concerns Policy	This policy outlines how members of the College community may raise concerns about child abuse and other student safety and wellbeing matters. This policy sets out how the College will respond to such concerns (including by complying with the College's mandatory reporting obligations).
Child Safety and Wellbeing - Recruitment and Employment Policy	This policy outlines the College's approach to ensuring student safety and wellbeing is a paramount consideration in the College's recruitment and employment practices.

## Roles and responsibilities

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

The below section sets out how the College allocates specific responsibilities for meeting its public commitment to child safety and wellbeing.

## College Board

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

Without limiting that responsibility, the 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 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 keeps, 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.

## Principal

In accordance with good governance, the Board delegates responsibility for the day-to-day operation of the College, and in particular the safety and wellbeing 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 school 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, and complying 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-operate 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.
- privacy and employment law obligations are met when responding to student concerns and complaints.

## Senior Leadership Team

The 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, the 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.

### **Child Safeguarding Committee**

The Child Safeguarding Committee provides oversight and operational direction for the College's Child Safety and Wellbeing Framework. The Committee has been composed of 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.

### **Child Safety and Wellbeing Officers**

Key responsibilities for the College's Child 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 any person may have, supporting the Principal in promptly managing the College's response to an allegation of actual or suspected child abuse or student safety and wellbeing risks, 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.

The Child Safety and Wellbeing Officers have specific responsibilities for receiving, assessing, and responding to child protection matters, including disclosures, allegations, or suspicions of harm. This role ensures compliance with legislative reporting obligations, including mandatory reporting requirements, and liaises with external agencies such as Child Safety Services, the Queensland Police Service, and other relevant authorities. The Child Safety and Wellbeing Officers ensure that responses to child protection concerns are timely, confidential, and respectful, and that appropriate records are maintained to support transparency and accountability. **All Staff** All staff are required to comply with the College's child safety and wellbeing framework (including in particular this policy, *Child 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 other child safety and wellbeing risks.

It is each staff member's individual responsibility to be:

- aware of key risk indicators of child abuse or other student safety and wellbeing risks,
- observant and to raise any concerns they may have with a Child Safety and Wellbeing Officer (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, labour hire workers, secondees and volunteers involved in student-connected work are required to adhere to this policy and the *Child 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 and other student safety and wellbeing risks.

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.

### **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.
- The safety and wellbeing of students is dependent upon the existence of a student safe culture.
- Student safety and wellbeing is everyone's responsibility.
- 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 Standards<sup>1</sup> 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 persons<sup>2</sup>. 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 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 deliver should be grounded in Aboriginal and Torres Strait Islander knowledge systems and self-determination principles

<sup>1</sup> Section 11 of the *Child Safe Standards Organisations Act 2024* (Qld)

<sup>2</sup> Section 11 of the *Child Safe Organisations Act 2024* (Qld)

## **A child safety and wellbeing culture**

Creating and maintaining a child 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 achieve this by setting clear expectations regarding student safety and wellbeing for 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 child safety and wellbeing a standing agenda item and reviewing the College's child safety and wellbeing processes across all levels).

## **Support and engagement of all students**

The College 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 thorough 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, including understanding, identifying, discussing and reporting on the following topics:

- student safety and wellbeing matters.
- standards of behaviour for students attending the College.
- healthy and respectful relationships.
- 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 LGBTIQ+ (or who are otherwise gender diverse), and those students who are unable to live at home.

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 Child Safety and Wellbeing Officers who champion student safety and wellbeing (see above).
- 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 child 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 child safety and wellbeing concerns**

The College takes all allegations or disclosures of suspected child abuse and other child safety and wellbeing concerns seriously, and responds to such allegations and disclosures promptly and thoroughly.

All instances of suspected child abuse, allegations of child abuse, or other student safety and wellbeing concerns and complaints, must be reported to a Child 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 *Child 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 or other student safety and wellbeing concerns may be raised with the College.
- who such concerns can be raised with at first instance (the College's Child 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 will ensure that the procedures contained in the *Child Safety and Wellbeing – Raising and Responding to Concerns Policy* is student-focused, and can be easily understood by the College community, in particular students.

***If you believe a student is at immediate risk of child abuse, immediately phone 000.***

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

### **Failure to protect offence**

Failure by a person in authority to protect a child under the age of 16 from criminal sexual abuse is an offence under section 229BB of Schedule 1 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 (including a student of a school) will become a victim of a sexual offence by an adult associated with the College.

The person in a position of authority 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 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.

### **Child safety and wellbeing employment practices**

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

All positions that involve student-connected work at the College 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 student safety and wellbeing.
- the College's values and commitment in respect of child safety and wellbeing.

Student safety and wellbeing is a paramount consideration during the recruitment process. All staff working with children and young people must be suitable and uphold 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 *Child 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 Queensland College of Teacher's (QCT) registration or Working with Children Check (WCCC) must be sighted and verified by the College, and appropriately recorded before staff can engage with the College.

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 *Child 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 with the College about:

- individual and collective obligations and responsibilities for identifying and managing the risk of child abuse or other student safety and wellbeing concerns.
- child abuse or other child safety and wellbeing risks in the College environment (including the online environment).
- the College's current child 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.

### **Child safety and wellbeing concerns contact mechanisms**

The College has appointed Child 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 Child 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

Child Safety and Wellbeing Officers can also be contacted via Reception on **07 5573 8600**.

Child 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 Child Safety and Wellbeing Officers should they hold any concerns relating to student safety and wellbeing.

Staff, students and parents can contact the Child 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 other student safety and wellbeing concerns.

### **Risk management**

The College will develop and implement risk management strategies regarding child 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 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 child safety and wellbeing is actively promoted at the College.

Where the College identifies risks of actual or suspected child abuse or other student safety and wellbeing concerns occurring in the online or physical College environment, the College 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. 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 child 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 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 age-appropriate prevention programs and other relevant information about child abuse (including sexual abuse) and other child safety and wellbeing risks.
- staff are attuned to the signs of harm (including that caused by child abuse and other child safety and wellbeing risks) 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 are 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 child 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.

## 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.

## Policy communication

This policy is made publicly available on the College's website.

This policy is 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 child safety and wellbeing framework, including this policy will be addressed in the College's professional development updates, training programs and newsletters.

## Policy implementation

To properly implement this policy:

- 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 after a significant student safety and wellbeing incident) and implement improvements where applicable.
- families and the College community will be afforded the opportunity to contribute to the review and development of the College's child safety and wellbeing policies and practises (including this policy).
- periodic training and refresher sessions on this policy are provided to all staff.
- the Principal is responsible for monitoring staff compliance with this policy.
- all staff must be familiar with and abide by this policy, and assist the College in the implementation of this policy.

## Definitions

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	refers to a person who is under the age of 18, 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: <ul style="list-style-type: none"> <li>• Any act committed against a child involving a sexual offence or grooming.</li> <li>• The infliction on a child, of physical violence or serious emotional or psychological harm.</li> <li>• Serious neglect of a child.</li> </ul>
Child safety (or student safety)	relates to protecting all children and young people from harm, managing and minimising the risk of harm, and responding to suspicions, incidents, disclosures or allegations of harm.
Child wellbeing (or student wellbeing)	relates to the actions that progress and support the child's or young person's physical and psychological development.
College	refers to Saint Stephen's College including the Early Learning Centre.

College community	means all those who are directly and indirectly involved with the College, including students, parents, caregivers and alumni, as well as businesses, charitable organisations and locals that are affiliated with the College.
College environment	refers to physical or online environments, used during or outside school hours and includes: <ul style="list-style-type: none"> <li>• The College campus including the Early Learning Centre.</li> <li>• Online environments made available or authorised by the College for use by a student (including email, intranet systems, software applications, collaboration tools, and online services).</li> <li>• Other locations provided by the College or through a third-party provider for a student to use including, but not limited to, locations used for: <ul style="list-style-type: none"> <li>○ Camps.</li> <li>○ Approved homestay accommodation providers.</li> <li>○ Delivery of education and training such as registered training organisations or another school.</li> <li>○ Sporting events, excursions, competitions or other events.</li> </ul> </li> </ul>
Enrichment	Activities that go beyond the regular curriculum to extend or support a child's growth, wellbeing, and interests. Examples include sport, music, cultural programs, clubs, excursions, and camps.
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 <sup>3</sup>	(1) Harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. (2) It is immaterial how the harm is caused. (3) Harm can be caused by— (a) physical, psychological or emotional abuse or neglect; or (b) sexual abuse or exploitation. (4) Harm can be caused by— (a) a single act, omission or circumstance; or (b) a series or combination of acts, omissions or circumstances.
Learning	Activities, experiences, or programs designed to build a child's knowledge, skills, or understanding. This includes classroom teaching, online lessons, practical training, or self-directed study.
Mandatory reporter	has the meaning given to it by section 13E of the <i>Child Protection Act 1999</i> (Qld). It includes but is not limited to registered teachers (including early childhood teachers), staff with post-secondary qualifications employed in the care, education or minding of children, school principals, registered nurses, students in training to become teachers (who have been granted permission to teach under relevant legislation), registered psychologists, out of home care workers, early childhood workers and any other person referred to in section 13F of the <i>Child Protection Act 1999</i> (Qld).
Online environment	refers to the internet, including email, messaging, social media, video calls, learning platforms, or gaming/chat apps.
Parent	includes a guardian or caregiver, and 'parents' has a corresponding meaning.
Physical environment	The real, in-person spaces where children and adults interact, such as classrooms, playgrounds, buses, sporting fields, or College events.
Physical violence	includes an act that causes physical injury or pain. Examples of physical violence can include: <ul style="list-style-type: none"> <li>• Hitting, kicking and punching.</li> <li>• Pushing, shoving, grabbing, throwing and shaking.</li> <li>• Using an object to hit or strike.</li> <li>• Using inappropriate restraint/excessive force.</li> <li>• Physical violence does not include lawful behaviour. For example:</li> </ul>

<sup>3</sup> Section 9 of the *Child Protection Act 1999* (Qld)

	<ul style="list-style-type: none"> <li>Reasonable steps taken to protect a child from immediate harm, such as taking their arm to stop them from going into oncoming traffic.</li> <li>Medical treatment given in good faith by an appropriately qualified staff member, such as a senior first aid officer administering first aid.</li> </ul> <p>Threats of physical violence that do not cause physical injury or pain may still amount to behaviour that causes emotional or psychological harm.</p>
Reasonable belief	<p>means a belief that would lead a reasonable person in the same position as you, and with the same information as you to form a belief that child abuse (including sexual abuse) is occurring or may occur. 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.</p> <p>For example, a 'reasonable belief' about a sexual offence might be formed when:</p> <ul style="list-style-type: none"> <li>A student states that they have been sexually abused.</li> <li>A student states that they know someone who has been sexually abused (because sometimes the student may be talking about themselves).</li> <li>Someone who knows a student states that the student has been sexually abused.</li> <li>Professional observations of the student's behaviour or development lead a professional to form a belief that the student has been sexually abused.</li> <li>Signs of sexual abuse led to a belief that the student has been sexually abused.</li> </ul> <p>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.</p> <p>Staff who are not sure whether they have a reasonable belief must consult with a Child Safety and Wellbeing Officer.</p>
Restricted Person	<p>means a person who—</p> <ul style="list-style-type: none"> <li>holds a negative notice; or</li> <li>holds a working with children authority that is suspended; or</li> <li>is a disqualified person and does not hold a working with children authority; or</li> <li>has been charged with a disqualifying offence the proceeding for which has not ended; or</li> <li>is the subject of an adverse interstate Working with Children (WCC) decision that is in effect.</li> </ul>
Senior Leadership Team	<p>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.</p>
Sexual misconduct	<p>includes behaviour, physical contact or speech or other communication of a sexual nature (including inappropriate touching, grooming behaviour and voyeurism).</p> <p>Other examples of sexual misconduct include:</p> <ul style="list-style-type: none"> <li>Developing an intimate relationship with a student, for example, through regular contact with the student without the knowledge or approval of the College;</li> <li>Inappropriately discussing sex and sexuality with a student; or</li> </ul> <p>Other overtly sexual acts that could lead to the College taking disciplinary or other action.</p>
Sexual offence	<p>means a sexual offence set out in chapter 22 of Schedule 1 of the <i>Criminal Code Act 1899</i> (QLD) and includes sexual assault (including rape and attempted rape), indecent acts, possession of child abuse material, exposure to pornography, and grooming.</p> <p>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).</p>
Significant	<p>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</p>

Staff <sup>4</sup>	<p>Within the Act, staff are referred to as workers of an entity. A worker is:</p> <ul style="list-style-type: none"> <li>• an employee of the entity</li> <li>• a volunteer</li> <li>• a contractor, subcontractor or consultant</li> <li>• an individual supplied by a provider of labour hire services</li> <li>• an executive officer of an entity, or another person concerned with the entity's management</li> <li>• a trainee or person undertaking work experience</li> <li>• a minister of religion, religious leader or officer of the religious body</li> <li>• an individual operating as a sole trader</li> <li>• an honorary officer under schedule 3 of the <i>Child Protection Act 1999</i> (Qld).</li> </ul> <p>For the avoidance of doubt, 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.</p>
Student	refers to children and young people enrolled at Saint Stephen's College Prep to Year 12 Campus or Early Learning Centre, regardless of whether the young person is over 18 years of age.
Student-connected work	means work authorised by the College and performed by an adult in a College environment while children or young people are present or reasonably expected to be present.
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 School's, or an external body's investigation of the concern.
Working with Children Checks	<p>At Saint Stephen's College anyone working or volunteering at the College will be required to:</p> <ul style="list-style-type: none"> <li>• provide a valid Blue Card or valid Exemption Card; or</li> <li>• provide a valid Queensland College of Teacher (QCT) Registration; or</li> <li>• provide a completed Restricted Person Declaration Form.</li> </ul>

Blue Cards or Exemption Cards are administered by Blue Card Services under the *Working with Children (Risk Management and Screening) Act 2000* (Qld).

Queensland College of Teacher (QCT) Registration is administered by the Queensland College of Teachers under the *Education (Queensland College of Teachers) Act 2005* (Qld).

Restricted Person Declaration Forms, although not administered by Blue Card Services, is required to rely on certain exemptions for needing a Blue Card.

## Source of obligation

*Child Safe Organisations Act 2024* (Qld)

*Child Protection Act 1999* (Qld)

*Criminal Code Act 1899* (Qld)

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

*Education (Accreditation of Non-State Schools) Regulation 2017* (Qld)

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

*Working with Children (Risk Management and Screening) Act 2000* (Qld)

National Quality Framework

Code of Ethics for Teachers in Queensland

National Code of Conduct for Health Care Workers (Queensland)

Early Childhood Australia's Code of Ethics

## Related policies and procedures

Saint Stephen's College Strategy: Aspirations towards 2034

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

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<sup>4</sup> Section 8 of the *Child Safe Organisations Act 2024* (Qld)

Saint Stephen's College Child Safety and Wellbeing - Staff Code of Conduct  
 Saint Stephen's College Child Safety and Wellbeing - Raising and Responding to Concerns Policy  
 Saint Stephen's College Child Safety and Wellbeing - Recruitment and Employment Policy  
 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 Student Disability Discrimination Policy and Procedure  
 Saint Stephen's College Privacy Policy  
 Saint Stephen's College Work Health and Safety Policy

## 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, 2<sup>nd</sup> Edition

## Document history

Version	Date	Author	Amendments
1.0	12 November 2025	Josie Burford	First version of document.



# Saint Stephen's College

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*Developing character, inspiring hope*

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