



Saint Stephen's College

# CHILD SAFETY AND WELLBEING – RAISING AND RESPONDING TO CONCERNS POLICY

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## Contents

<b>Introduction</b> .....	1
<b>Purpose</b> .....	1
<b>Scope</b> .....	1
<b>Overview of Child Safety and Wellbeing Framework</b> .....	2
<b>Overarching principles</b> .....	2
<b>How the College community may raise concerns with the College</b> .....	2
<b>The College's response This section sets out how the College will acknowledge a concern.</b> .....	3
<b>Other considerations</b> .....	5
<b>The College's reporting obligations</b> .....	6
<b>Claims for child sexual abuse</b> .....	6
<b>Policy communication</b> .....	7
<b>Policy implementation To properly implement this policy:</b> .....	7
<b>Definitions</b> .....	7
<b>Schedule One Mandatory reporting obligations</b> .....	10
<b>Source of obligation</b> .....	12
<b>Related policies and procedures</b> .....	12
<b>Related documents</b> .....	12
<b>References</b> .....	12
<b>Document history</b> .....	12

## 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.

This policy sets out in an accessible, child focused, culturally safe and easily understood manner, the ways in which concerns about all forms of child abuse:

- may be brought to the College's attention; and
- will otherwise be dealt with, both internally and in accordance with the College's external reporting obligations.

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

## Purpose

This policy sets out how the College will respond to and report child abuse allegations as part of the College's child safety and wellbeing framework (underpinned by the Child Safety and Wellbeing Policy), and for the purpose of Queensland's Child Safe Standards.

## Scope

This policy applies to all Board members, 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 student connected 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.

### Overarching principles

Staff have a variety of mandatory reporting obligations in relation to concerns about child abuse or other student safety and wellbeing matters. The College is guided by this policy to fulfil its (and its staff's) obligations and aims to ensure that:

- Staff, students and members of the College community feel encouraged to raise concerns in accordance with this policy.
- Contact details of Child Safety and Wellbeing Officers are readily available and widely known to the College community.
- All concerns are treated seriously, with the utmost importance and are responded to in a prompt, appropriate, sensitive and thorough fashion.
- The College and its staff have knowledge and an understanding of their legal obligations with their reporting obligations, and comply with these proactively.
- The College's processes for responding to concerns (and the complaints process generally) are legally compliant (with regard to privacy laws, reporting obligations and employment law), culturally safe and understood broadly - including by children and young people, families and staff.
- Investigations are conducted fairly and without bias, promptly and without undue delay.
- All reasonable steps are taken to protect the identity and wellbeing of a student who is the subject of a concern, and no adverse action is taken against a person who raises a concern (or is a child or young person who is the alleged victim of child abuse).
- All reasonable steps are taken to co-operate with law enforcement agencies regarding concerns, and that these are reported to relevant authorities regardless of the legal obligation to do so.
- Members of the College community understand and have confidence in the processes that will be followed by the College in response to concerns.
- This policy is student-focused and can be easily understood by the College community, in particular students.

When complying with this policy, it must be appreciated that fulfilling the roles and responsibilities contained herein will not displace or discharge any other obligations that arise if a person reasonably believes that a student is at risk of child abuse.

### How the College community may raise concerns with the College

*If you have a belief that a student is in immediate danger, you should immediately phone the Police on 000.*

If you are a member of the College community (other than a member of staff), with a concern about child abuse or other student safety and wellbeing matters, then you are encouraged to raise that concern with a Child Safety and Wellbeing Officer.

Relevant contact details for the College's Child Safety and Wellbeing Officers are set out in the below table:

Name	Position	Contact details
Michael Kleidon	Principal	<a href="mailto:principalsoffice@ssc.qld.edu.au">principalsoffice@ssc.qld.edu.au</a>
Sam Holmes	Executive Director of International Education	<a href="mailto:exec.intl@ssc.qld.edu.au">exec.intl@ssc.qld.edu.au</a>
Dane Oman	Dean of Senior Students	<a href="mailto:dean.senior@ssc.qld.edu.au">dean.senior@ssc.qld.edu.au</a>
Leith Biggs	Head of Junior College	<a href="mailto:head.junior@ssc.qld.edu.au">head.junior@ssc.qld.edu.au</a>
Rachael Egerton	Director of Early Learning Centre	<a href="mailto:dir.elc@ssc.qld.edu.au">dir.elc@ssc.qld.edu.au</a>

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

Where a concern relates to a Child Safety and Wellbeing Officer, it should be reported to the Principal.

As the safety and wellbeing of students is the College's paramount consideration, you are encouraged to make a report, whether or not you have formed a belief or suspicion on reasonable grounds that child abuse or other conduct that presents a risk to student safety has occurred.

### How staff will deal with their own concerns

Staff with, or who are aware of concerns must also address any concerns they may have in accordance with this policy.

### Concerns about the Principal or the Board

Where a concern relates to the Principal or a Board member, concerns should be raised with the Chair of the Board via email at [boardchair@ssc.qld.edu.au](mailto:boardchair@ssc.qld.edu.au) or via post: PO Box 441 Oxenford Queensland 4209. If the concern relates to the Chair of the Board, the concern should be raised with the Chair of the Risk and Compliance Committee via email at [rcchair@ssc.qld.edu.au](mailto:rcchair@ssc.qld.edu.au) or via post: PO Box 441 Oxenford Queensland 4209.

In those circumstances, the Chair of the Board or Chair of the Risk and Compliance Committee will be responsible for meeting the Principal's responsibilities as set out in this policy.

### The College's response

This section sets out how the College will acknowledge a concern.

### Receiving a concern

Staff, upon becoming aware of a concern, are required to:

- Listen to the concern in a considerate, patient and supportive manner (and appropriately where the concern is coming from a student).
- Identify the party or parties involved.
- Confirm the basic details, without seeking extensive information, casting judgment or asking suggestive or leading questions.
- Take a detailed file note.
- Remain balanced and not assess the validity of the concern(s) being raised.
- Explain that other people may need to be informed about the concern, in order to stop any inappropriate or unlawful behaviour and to comply with the College's legal obligations and procedures.
- Confirm that the College treats the concern seriously.
- Offer support to the student(s) involved in the concern, and their families. This may include encouragement to access confidential wellbeing and support services, either internal or external to the College.

- Outline the process that will be followed by the College in dealing with the concern, in accordance with this policy.

Staff should then:

- Promptly and thoroughly manage the response of the College (including by monitoring the College's overall compliance with this policy and accounting for alternatives if the staff member allocated to resolve the concern is unable to perform their role).
- Comply with their personal reporting obligations as set out in this policy.
- Notify a Child Safety and Wellbeing Officer about the concern.
- If a Child Safety and Wellbeing Officer is the subject of the concern, notify the Principal about the concern.
- If the Principal is the subject of the concern, notify the Chair of the Board about the concern.
- If the Chair of the Board is the subject of the concern, notify the Chair of the Risk and Compliance Committee.

The College will then take such steps as it considers appropriate to protect any student connected with a concern until it is resolved, including by ensuring that any mandatory reporting obligations are met, and also, that allegations, suspicions or disclosures are made to relevant authorities (including but not limited 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) have been met, regardless of whether there is a legal obligation to report.

### **Resolving the concern**

The College will investigate the concern where appropriate, which will ordinarily require a determination, on the balance of probabilities, whether the concern is substantiated or not.

When doing so, the College will take into account the diversity and characteristics of the College community to ensure equity is upheld and act to reduce barriers to inclusion.

The decision-maker will usually be the Principal (or their delegate), although where the concern relates to the alleged conduct or misconduct of the Principal then the decision-maker will be the Chair of the Board. The College may rely on legal or third-party assistance to investigate or determine the concern.

Where a concern involves allegations against a staff member, the College will need to notify the staff member about those allegations (to the extent that it is appropriate to do so, which may initially involve only notification that a concern has been raised), outline the process to be followed, and advise the staff member about the process pending the resolution of the concern (which may, in appropriate cases include the staff member being stood down, without judgment, while the concern is being dealt with).

To the extent that the College decides it is appropriate or practicable to do so, any investigation will usually involve:

- Interviewing the subject of the concern and key witnesses or individuals (noting that more than one interview may be required).
- Reviewing relevant documents, correspondence and materials of substance.
- Taking notes of any interviews (or where appropriate, transcripts of audio recordings of any interviews) during the investigation.
- The relevant decision-maker determining whether, on the balance of probabilities, the concern is substantiated.

Witnesses being interviewed will not be unreasonably refused a support person.

If a concern is substantiated, the College will take appropriate action (which may, in the case of a current staff member, potentially include summary dismissal for serious misconduct). Even if a concern is not substantiated, the findings made by the College during the course of investigating the concern may, in certain cases, still result in disciplinary action (including dismissal).

Following the conclusion of its investigation, the College will indicate the outcomes of the investigation to:

- The person, or student who raised the concern.
- The person subject of that concern (where appropriate).

- Any external authorities (including but not limited 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) to whom a report is required to be made.

### **The College may need to adjust this policy to reflect the circumstances**

This policy applies regardless of whether the alleged behaviour which is the subject of a concern, occurred on or outside College grounds, or concerns current or former students.

It may not be appropriate or possible for the College to investigate a concern in strict accordance with this policy where a concern is raised with the College and:

- An investigation by Queensland Police or the Queensland College of Teachers relevant to the concern is ongoing.
- Civil or criminal proceedings relevant to the concern are ongoing.
- The concern relates to the conduct of current or former students.
- The concern relates to the conduct of former staff.

In such circumstances, the College will seek and act on legal advice to comply with this policy to the extent it is appropriate to do so (and in particular to protect the safety and wellbeing of all current students enrolled with the College).

### **Keeping the College informed**

It is the College's preference that members of the College community (including students, staff, volunteers, parents, etc) promptly inform a Child Safety and Wellbeing Officer of any matters on the subject of a potential reporting obligation under this policy which relate to the College community, so that the College can coordinate the information and support the Police and affected students and their families as required.

However, the College appreciates that in some cases it will be necessary for an external report to be made before the College is notified (and nothing in this policy is intended to limit a person's right, or obligation, to make external reports). At the very least, a Child Safety and Wellbeing Officer should be notified after an external report is made.

### **Reflection and continuous improvement**

The College will analyse concerns and incidents to identify causes and (if applicable) systemic changes to inform continuous improvement.

### **Other considerations**

#### **Concerns relating to other students**

This policy also applies to concerns involving the behaviour of other students.

For example, mandatory reporting obligations are not limited to the actions of staff, and the failure to disclose an offence can also apply to alleged sexual activity by adult students.

Where a concern involves child abuse or other inappropriate behaviour allegedly perpetrated by a student, the College will comply with its mandatory reporting obligations, and may otherwise exercise its discretion to notify Queensland Police.

Subject to any Police clearance which may be required, the College will otherwise deal with student-on-student behavioural issues in accordance with its usual student management and discipline procedures, including the *Student Code of Conduct*.

#### **Information provided to students**

Students are provided with age-appropriate information during class time and through College assemblies about what to do in response to an allegation of suspected child abuse and the need to promptly alert a member of staff if they believe that they, or a peer, is suffering from child abuse.

Information provided to students includes, but is not limited to:

- Remain calm.
- Promptly seek help and speak to a trusted staff member (including a Child Safety and Wellbeing Officer) about the concern.
- Remember this is not your fault, you are not to blame and are not in trouble.

- Tell the story in your own words, with as much detail as you can.
- Do not be afraid of saying the “wrong” thing.
- Listen carefully to any instructions you receive from staff (or if applicable, the Police or other authorities).
- Listen carefully to information you receive from staff about what will happen next (for example, and subject to the circumstances, authorities notified, parents informed, internal and/or external investigation).
- Be reassured that you have done the right thing.

### **Records**

The College will make, keep and secure clear and contemporaneous records of any concerns raised in accordance with this policy, and the steps taken by the College to respond to those concerns.

### **Support**

The College will afford appropriate support to students the subject of, or otherwise connected to, concerns raised under this policy, particularly until the concern is resolved.

If a concern involves a student who identifies as Aboriginal or Torres Strait Islander, or is from a culturally and/or linguistically diverse background, has a disability or is otherwise vulnerable (including without limitation students who identify as LGBTIQ+, or are unable to live at home), steps will be taken to ensure that the student, and their family, is supported to understand the situation and are supported (including via the use of an interpreter where required).

The College will also provide appropriate support to staff who make mandatory reports under this policy, or who are assisting the College or families with the process outlined in this policy.

### **Cooperation with authorities**

The College will cooperate with any external authorities (including but not limited 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) in relation to a concern or report (whether made under this policy or otherwise).

### **Confidentiality**

Appropriate confidentiality will be maintained at all times when dealing with concerns under this policy, with information only being provided to those who have a right or otherwise, on a “needs to know” basis.

### **Communication**

Where appropriate, the College will provide parents, carers and guardians with guidance and support where a student is the subject of a concern.

Staff do not require consent from a student’s parents before making a mandatory report in accordance with this policy. Similarly, staff are not required to disclose that a mandatory report has been made.

However, the College will keep families updated as it considers appropriate about the way in which it is dealing with concerns affecting that family’s child.

### **Victimisation is not tolerated**

The College will not tolerate victimisation towards someone because they have raised or participated in a process contemplated by this policy, including by raising a concern or making a mandatory report.

### **The College’s reporting obligations**

Schedule One sets out the main mandatory reporting obligations that apply to the College and its staff.

The College treats seriously its reporting obligations and recognises that child safety and wellbeing is everyone’s responsibility. Whilst the Child Safety and Wellbeing Officers are primarily entrusted with day-to-day responsibility for ensuring that these reporting obligations are met, all staff and appropriate personnel are required to uphold the ethos of this policy by ensuring that child safety and wellbeing matters are reported internally, and externally where required.

Staff will receive training on their personal reporting obligations to achieve this.

### **Claims for child sexual abuse**

The College’s child safety and wellbeing framework (including this policy) contains strategies which demonstrate how the College remains eternally vigilant about managing the risk of betrayal of trust; and will respond to concerns and reports about child abuse.

Where a survivor has experienced child sexual abuse for which the College is responsible as an institution, the College is committed to providing that individual with appropriate and trauma-informed redress.

Whilst decisions about offers of redress will be dictated by the relevant circumstances, offers will ordinarily include one or more of a direct personal response, access to professional counselling and psychological care, and, where appropriate, financial compensation.

### 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 ensure that they abide by this policy and assist the College implementing 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></ul>



	<ul style="list-style-type: none"> <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>
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>1</sup>	<p>(1) Harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing.</p> <p>(2) It is immaterial how the harm is caused.</p> <p>(3) Harm can be caused by —</p> <ul style="list-style-type: none"> <li>(a) physical, psychological or emotional abuse or neglect; or</li> <li>(b) sexual abuse or exploitation.</li> </ul> <p>(4) Harm can be caused by —</p> <ul style="list-style-type: none"> <li>(a) a single act, omission or circumstance; or</li> <li>(b) a series or combination of acts, omissions or circumstances.</li> </ul>
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	<p>includes an act that causes physical injury or pain. Examples of physical violence can include:</p> <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: <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> </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>

<sup>1</sup> Section 9 of the *Child Protection Act 1999* (Qld)

## Reasonable belief

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.

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 lead a professional to form a belief that the student has been sexually abused.
- Signs of sexual abuse led 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 Child Safety and Wellbeing Officer.

## Sexual misconduct

includes 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 sexual offence set out in chapter 22 of Schedule 1 of the *Criminal Code Act 1899* (QLD) and includes 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<sup>2</sup>

Within the Act, staff are referred to as workers of an entity. A worker is:

- an employee of the entity
- a volunteer
- a contractor, subcontractor or consultant

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<sup>2</sup> Section 8 of the *Child Safe Organisations Act 2024* (Qld)

- an individual supplied by a provider of labour hire services
- an executive officer of an entity, or another person concerned with the entity's management
- a trainee or person undertaking work experience
- a minister of religion, religious leader or officer of the religious body
- an individual operating as a sole trader
- an honorary officer under schedule 3 of the *Child Protection Act 1999* (Qld).

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.

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 College's, or an external body's investigation of the concern.

## Schedule One Mandatory reporting obligations

### Reporting a child abuse offence: Failure to report offence

The *Criminal Code Act 1899* (Qld) makes it a crime to fail to report an abuse offence against a child.

As a result, anyone (and not just professionals who work with the College's students, or with children and young people generally) aged 18 or over must make a report to Queensland Police if they form a reasonable belief that an abuse offence has been committed against another person who was a child (under the age of 16 years, or a person with an impairment of the mind) at the time of the alleged offence.

A 'reasonable belief' or a 'belief on reasonable grounds' is not the same as having proof, but is more than suspicion, mere rumour or speculation.

If you are not sure whether you have a reasonable belief, you must consult with a Child Safety and Wellbeing Officer or the appropriate body to which a report must be made.

If you have formed a reasonable belief in relation to an abuse offence, you must immediately report the belief to Queensland Police by calling 000 in an emergency.

You must then make a further report on each occasion on which you become aware of any further reasonable grounds for the reasonable belief.

Please note that fulfilling the roles and responsibilities contained in this policy do not displace or discharge any other obligations that arise if you reasonably believe that a child is at risk of child abuse.

Failure to make a report without reasonable excuse is an offence under section 229BC of Schedule 1 the *Criminal Code Act 1899* (Qld).

However, it may not be an offence not to disclose an abuse offence against a child to Queensland Police if you have a reasonable excuse. You may have a reasonable excuse if you:

- have a reasonable fear that disclosing the information would endanger the safety of any person (other than the alleged perpetrator of the child abuse offence).
- believe on reasonable grounds that the information has already been reported to Queensland Police by another person or Queensland Police already have that information.

If there is uncertainty about the need for a report to Queensland Police (or another body) you should seek advice from a Child Safety and Wellbeing Officer about whether you are still required to make a report.

### **Mandatory reporting**

Mandatory reporters (as defined below) have mandatory reporting obligations under the *Child Protection Act 1999* (Qld). Failure to make a mandatory report can constitute an offence under that Act.

A 'mandatory reporter' has the meaning given to a prescribed person by section 13E of the *Child Protection Act*. It includes but is not limited to Principals and teachers in any educational institution (including a kindergarten), registered or enrolled nurses, registered psychologists, persons who provide child care or child care services for fee or reward, persons concerned in the management of approved education and care services and any other person referred to in section 13F of the *Child Protection Act*.

If you are a mandatory reporter, and in the course of your work, you know, or believe or suspect 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; and
- may not have a parent able and willing to protect the child from the harm,

you must immediately make a report to the Department of Families, Seniors, Disability Services and Child Safety through the regional Child Safety Services Centre during business hours, or the Child Safety After Hours Service Centre on 1800 177 135 after hours. Additional reports must be made on each occasion where a mandatory reporter becomes aware of any further reasonable grounds for the belief or suspicion.

Staff must check whether they are mandatory reporters.

A mandatory reporter must make a report even if a Child Safety and Wellbeing Officer does not share their belief or suspicion that the report must be made. The College will afford support where appropriate to mandatory reporters who make a report under this policy.

Under section 13I of the *Child Protection Act*, a relevant person is not required to give a report under section 13G until the person has formed a reportable suspicion about a child, and once a relevant person has formed a reportable suspicion about a child, the person must comply with section 13G even though the person is taking, or has taken, other action in relation to the child.

### **Reporting sexual abuse or likely sexual abuse**

Sections 366 and 366A of the *Education (General Provisions) Act 2006* (Qld) provide that if a staff member becomes aware, or reasonably suspects, in the course of the staff member's employment at the College, that a student attending the College has been sexually abused, or is likely to be sexually abused, the staff member must provide a written report to the Principal or a Board member. The Principal or Board member must provide a written report to police.

### **Queensland College of Teachers**

Sections 76 and 77 of the *Education (Queensland College of Teachers) Act 2005* (Qld) requires the College to notify the Queensland College of Teachers if it deals with an allegation of harm caused, or likely to be caused, to a child because of the conduct of a teacher, and notify the Queensland College of Teachers of the outcome of the dealing.

### **Contacting Child Safety Services Centres**

Child Safety Services Centres may also be contacted where a staff member forms concerns about a student's wellbeing but a mandatory report is not required.

Examples of situations where contacting the Child Safety Services may be appropriate, but may not necessarily enliven mandatory reporting obligations, include:

- significant parenting problems that may be affecting the student's development.
- family conflict, including family breakdown.
- a family under pressure due to a family member's physical or mental illness, substance abuse, disability or bereavement.
- young, isolated and/or unsupported families.
- significant social or economic disadvantage that may adversely impact on a student's care or development.

Many cases will not fit neatly into these categories. For guidance about whether contacting the Child Safety Services Centres should be considered, staff can refer to the College's Child Safety and Wellbeing Officers and information available on the Department of Families, Seniors, Disability Services and Child Safety website.

Child Safety may be contacted through the regional Child Safety Services Centre during business hours, or the Child Safety After Hours Service Centre on 1800 177 135 after hours.

### 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 (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)*

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

*Education and Care Services Act 2013 (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

Saint Stephen's College Child Safety and Wellbeing Policy

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

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 Risk Management Framework

Saint Stephen's College Student Disability Discrimination Policy and Procedure

Saint Stephen's College Privacy Policy

### Related documents

Saint Stephen's College Child Safety and Wellbeing Risk Register

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

### 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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[www.saintstephenscollege.net.au](http://www.saintstephenscollege.net.au) | +61 7 5573 8600 | [admin@ssc.qld.edu.au](mailto:admin@ssc.qld.edu.au)