BORDER RIVERS CHRISTIAN COLLEGE
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Reporting Concerns of Harm and Abuse

Purpose:	The purpose of this policy is to provide written processes about – (a) how the college will respond to harm, or allegations of harm, to students under 18 years; and (b) the appropriate conduct of the college's staff and students to comply with the *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) section 16*.		
Scope:	Students and staff, including full-time, part-time, permanent, fixed term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements at Border Rivers Christian College.		
References:	• *Child Protection Act 1999* (Qld) • *Child Protection Regulation 2023* (Qld) • *Child Safe Organisations Act 2024* (Qld) • *Criminal Code Act 1899* (sections 229BB and 229BC*)* (Qld) • *Education (General Provisions) Act 2006* (Qld) • *Education (General Provisions) Regulation 2017* (Qld) • *Education (Accreditation of Non-State Schools) Act 2017* (Qld) • *Education (Accreditation of Non-State Schools) Regulation 2017* (Qld) • *Education (Queensland College of Teachers) Act 2005* (Qld) • *Working with Children Check Act 2000* (Qld) • *Work Health and Safety Act 2011* (Qld) • Border Rivers Christian College Complaints Handling Policy & Procedures		
Status:	Draft	**Supersedes:**	Child Protection Policy
Authorised by:	Border Rivers Christian College Board of Directors	**Date of Authorisation:**	10th October 2026
Review Cycle:	Annually, or as appropriate, to reflect changing legislation and environment.	**Next Review Date:**	10th October 2027
Policy Owner:	Border Rivers Christian College		

Version History

Version	Date	Notes
1.0	June 2026	Draft Approved
1.1	October 2026	Amended and Approved

Definitions

Harm, as per s 9 of the *Child Protection Act 1999*, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing.

1. It is immaterial how the harm is caused.
2. Harm can be caused by—
   a) physical, psychological or emotional abuse or neglect; or
   b) sexual abuse or exploitation.
3. Harm can be caused by—
   a) a single act, omission or circumstance; or
   b) a series or combination of acts, omissions or circumstances.

Child, for the purposes of this Policy, a *child* is any individual under 18 years of age, in accordance with section 8 of the *Child Protection Act 1999 (Qld)*.

1. This definition applies to all children and young people enrolled at or participating in activities conducted by Border Rivers Christian College, regardless of their age, year level, disability or individual circumstances. All concerns regarding actual, suspected or potential harm or abuse involving a child must be responded to in accordance with this Policy and applicable legislative requirements.

Child in need of protection, as per s10 of the *Child Protection Act 1999*, is a child who—

a) has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and
b) does not have a parent able and willing to protect the child from the harm.

Sexual abuse, as per s364 of the *Education (General Provisions) Act 2006*, in relation to a relevant person, includes sexual behaviour involving the relevant person and another person in the following circumstances—

(a) the other person bribes, coerces, exploits, threatens or is violent toward the relevant person;
(b) the relevant person has less power than the other person;
(c) there is a significant disparity between the relevant person and the other person in intellectual capacity or maturity.

Staff, in this policy, refers to full-time, part-time, permanent, fixed term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements.

Health and Safety

Border Rivers Christian College has written processes in place to enable it to comply with the requirements of the *Child Safe Organisations Act 2024* (Qld), the *Work Health and Safety Act 2011* (Qld) and the *Working with Children Check Act 2000* (Qld).[1]

[1] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.15*

Conduct of Staff and Students

All staff will ensure that their behaviour towards, and relationships with students, reflect proper standards of care for students. Staff, contractors and volunteers must not cause harm to students[2].

Reporting Inappropriate Behaviour

If a student considers the behaviour of a staff member to be inappropriate, the student should report the behaviour to:

- Julie Hoffmann – Business Manager; or
- Alison McCormick – First Aid Officer[3]

Dealing with Report of Inappropriate Behaviour

A staff member who receives a report of inappropriate behaviour must report it to the principal. Where the principal is the subject of the report of inappropriate behaviour, the staff member must inform a director of the college's governing body[4]. Reports will be dealt with under the college's Complaints Handling Policy & Procedures.

Reportable Conduct Scheme Obligations

The college will comply with its obligations under the *Child Safe Organisations Act 2024* (Qld) by ensuring that reportable allegations and reportable convictions involving workers are reported internally as soon as practicable, notified to the Queensland Family and Child Commission within required statutory timeframes, and appropriately investigated and reported as required under the Act.[5]

An initial report under this section must include the following particulars:

a) details of the reportable allegation or reportable conviction;
b) the name, including any former name or alias, of the worker the subject of the reportable allegation or reportable conviction;
c) the date of birth of the worker, if known;
d) the name of the head of the reporting entity;
e) whether the sector regulator for the reporting entity or the police service has been contacted about the reportable allegation or reportable conviction;
f) the reporting entity's contact details, including its name, address and telephone number;
g) if the worker currently performs work for the reporting entity—any action, including risk management action, taken in response to the reportable allegation or reportable conviction, including, for example—
    i. immediate steps taken to prevent the worker from having contact with children; and
    ii. any disciplinary action taken or proposed to be taken against the worker;
h) any other matter prescribed by regulation.[6]

[2] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(1)*
[3] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2) and s.16(3)*
[4] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2)*
[5] *Child Safe Organisations Act 2024 (Qld) s.33-37*
[6] *Child Safe Organisations Act 2024 (Qld) s.35*

Queensland College of Teachers Obligations

The College will comply with its obligations under the *Education (Queensland College of Teachers) Act 2005* (Qld) by notifying the Queensland College of Teachers as soon as practicable when the college begins dealing with an allegation of harm to a child involving a teacher, and again as soon as practicable once the college's dealings with the allegation are concluded.[7]

A notice when the college begins dealing with an allegation of harm to a child involving a teacher must include the following particulars:

a) the name of the employing authority and, if the name of the authority is different to the name of the prescribed school, the name of the prescribed school;
b) the name of the relevant teacher;
c) the day the employing authority started dealing with the allegation;
d) the allegation, particulars of the allegation and any other relevant information;
e) details about what actions the employing authority has taken to deal with the allegation.[8]

Reporting Sexual Abuse[9]

Section 366 of the *Education (General Provisions) Act 2006* states that if a staff member becomes aware, or reasonably suspects, in the course of their employment at the college, that any of the following has been sexually abused by another person:

a) a student under 18 years attending the college;
b) a person with a disability who:
   i. under section 420(2) of the *Education (General Provisions) Act* 2006 is being provided with special education at the college; and
   ii. is not enrolled in the preparatory year at the college.

then the staff member must give a written report about the abuse or suspected abuse to the principal or to a director of the college's governing body immediately.

The college's principal or the director must immediately give a copy of the report to a police officer.

If the first person who becomes aware or reasonably suspects sexual abuse is the Border Rivers Christian College principal, the principal must give a written report about the abuse, or suspected abuse to a police officer immediately and must also give a copy of the report to a director of the college's governing body immediately.

A report under this section must include the following particulars:

a) the name of the person giving the report (the ***first person***);
b) the student's name and sex;
c) details of the basis for the first person becoming aware, or reasonably suspecting, that the student has been sexually abused by another person;
d) details of the abuse or suspected abuse;

[7] *Education (Queensland College of Teachers) Act 2005 (Qld) s.76 and s.77*
[8] *Education (Queensland College of Teachers) Act 2005 (Qld) s.76*(3)
[9] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2)(c)*

e) any of the following information of which the first person is aware:
   i. the student's age;
   ii. the identity of the person who has abused, or is suspected to have abused, the student;
   iii. the identity of anyone else who may have information about the abuse or suspected abuse[10].

Reporting Likely Sexual Abuse [11]

Section 366A of the *Education (General Provisions) Act 2006* states that if a staff member reasonably suspects in the course of their employment at the college, that any of the following is likely to be sexually abused by another person:

a) a student under 18 years attending the college;
b) a person with a disability who:
   i. under section 420(2) of the *Education (General Provisions) Act* 2006 is being provided with special education at the college; and
   ii. is not enrolled in the preparatory year at the college.

then the staff member must give a written report about the suspicion to the principal or to a director of the college's governing body immediately.

The college's principal or the director must immediately give a copy of the report to a police officer.

If the first person who reasonably suspects likely sexual abuse is the college's principal, the principal must give a written report about the suspicion to a police officer immediately and must also give a copy of the report to a director of the college's governing body immediately.

A report under this section must include the following particulars:

a) the name of the person giving the report (the *first person*);
b) the student's name and sex;
c) details of the basis for the first person reasonably suspecting that the student is likely to be sexually abused by another person;
d) any of the following information of which the first person is aware:
   i. the student's age;
   ii. the identity of the person who is suspected to be likely to sexually abuse the student;
   iii. the identity of anyone else who may have information about suspected likelihood of abuse[12].

Responding to Harm[13]

Harm caused by physical or sexual abuse

Under Section 13E(3) of the *Child Protection Act 1999*, if a doctor, a registered nurse, a teacher or an early childhood education and care professional forms a 'reportable suspicion' about a child "in the course of their engagement in their profession", they must make a written report.

[10] *Education (General Provisions) Regulation 2017 (Qld) s.68*
[11] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2)(c)*
[12] *Education (General Provisions) Regulation 2017 (Qld) s.69*
[13] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16 (1) and(2)(d)*

A reportable suspicion about a child is a reasonable suspicion that the child:

a) has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and
b) may not have a parent able and willing to protect the child from the harm.

The doctor, nurse, teacher or early childhood education and care professional must give a written report to the Chief Executive of the Department of Families, Seniors, Disability Services and Child Safety (or another department administering the *Child Protection Act 1999*). The doctor, nurse, teacher or early childhood education and care professional should give a copy of the report to the principal.

A report under this section must include the following particulars:

a) the basis on which the person has formed the reportable suspicion[14];
b) the child's name, age and sex descriptor;
c) details of how to contact the child;
d) details of the harm to which the reportable suspicion relates;
e) particulars of the identity of the person suspected of causing the child to have suffered, suffer, or be at risk of suffering, the harm to which the reportable suspicion relates;
f) particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates[15].

Outside of business hours, you can contact the Child Safety After Hours Service Centre on phone freecall 1800 177 135 (Queensland only).

Contact your local Regional Intake Service during business hours on:

South West (Darling Downs)
Toowoomba PHONE: 1800 683 390

Harm caused by psychological or emotional abuse or neglect

When the college receives any information alleging 'harm'[16] to a student (other than harm arising from physical or sexual abuse) it will deal with the situation compassionately and fairly so as to minimise any likely harm to the extent it reasonably can, this may include reporting through the principal to Child Safety.[17] If the harm is not at a level that is otherwise reportable to Child Safety, the matter should be referred to the principal, who may then refer the matter to Family and Child Connect.

[14] *Child Protection Act 1999 s.13G (2)(a)*
[15] See *Child Protection Regulation 2023 (Qld) s.4 "Information to be included in reports"*
[16] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(7): the definition of 'harm' for this regulation is the same as in section 9 of the Child Protection Act 1999 (Qld)*
[17] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16 (1)(a)*

Responsibilities under Criminal Code Act 1899 (Qld)

The *Criminal Code Act 1899* includes two offences that pertain to the failure to report a child sexual offence and the failure to protect a child against a child sexual offence. A child sexual offence is an offence of a sexual nature by an adult against a child under 16 years or a person with an impairment of the mind.

Failure to Report[18]

Under section 229BC of the Code, all adults must report sexual offences against a child by another adult to police as soon as reasonably practicable after the belief is, or ought reasonably to have been, formed. Failure to make a report, without a reasonable excuse, is a criminal offence. This offence applies to all adults inclusive of students 18 years or older, as well as parents/guardians and volunteers at the college. A reasonable excuse not to make a report under the *Criminal Code Act 1899* includes that a report has already been made under the *Education (General Provisions) Act 2006* (reporting sexual abuse or likely sexual abuse) and the *Child Protection Act 1999* (reporting significant harm or risk of significant harm) as per this policy.

Failure to Protect[19]

Under section 229BB of the Code, all adults in positions of power or responsibility within institutions to reduce or remove the risk of child sexual offences being committed must take reasonable steps to protect children in their care from a child sexual offence. A failure to protect is an offence.

Awareness

The college will inform staff, students and parents of its processes relating to the health, safety and conduct of staff and students in communications to them and it will publish these processes on its website[20].

These processes will be communicated to new staff during induction and to new students and parents during enrolment. Copies are available upon request from the Administration Office. Student Chapel will also be used to keep students and families informed of any amendments to the College's policies and procedures, along with the Student Code of Conduct.

Accessibility of Processes

Processes relating to the health, safety and conduct of staff and students are accessible on the college website and will be available on request from the college administration[21].

[18] *Criminal Code Act 1899 (Qld) s.229BC*
[19] *Criminal Code Act 1899 (Qld) s.229BB*
[20] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(a)*
[21] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(b)*

Training

The college will train its staff in processes relating to the health, safety and conduct of staff and students on their induction and will refresh training annually[22].

Each staff member must complete annual Child Safety Training, and the College will maintain attendance records for this training. Additional training will be provided where legislative changes require updates to college policies.

Staff meetings may be used, where appropriate, to provide child safety information and support related discussion. Staff will be provided with updated policies as amendments are made and each staff member will receive the current Staff Code of Conduct.

Implementing the Processes

The college will ensure it is implementing processes relating to the health, safety and conduct of staff and students by auditing compliance with the processes annually[23].

Complaints Procedure

Suggestions of non-compliance with the college's processes may be submitted as complaints under Border Rivers Christian College Complaints Policy & Procedures.[24].

Related Policies and Procedures

- Border Rivers Christian College Student Wellbeing Policy
- Border Rivers Christian College Work Health and Safety Policy
- Border Rivers Christian College Concerns of Harm and Abuse Reporting Form
- Border Rivers Christian College Staff Code of Conduct
- Border Rivers Christian College Student Code of Conduct

[22] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(c)*
[23] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(d)*
[24] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(5) and s.16(6)*

Appendix 1

Summary of Reporting

Who	What abuse	Test	Must Report to	Legislation
All staff	Sexual and Likely Sexual	Awareness or suspicion Sexually abused or likely to be sexually abused	Principal or to a director of the governing body, through to police immediately	EGPA sections 366(2) and 366A (2)
Principal if 'first person'	Sexual	Awareness or suspicion Sexually abused or likely to be sexually abused	A director of the governing body and police immediately	EGPA sections 366 and 366A
Teacher and registered nurse	Sexual and physical	Significant harm; and Parent may not be willing and able	Confer with principal, report to Child Safety	CPA sections 13E and 13G
All staff	Physical, psychological, emotional, neglect, exploitation	Significant harm, and Parent may not be willing and able	Principal, through to Child Safety	Accreditation Regulation section 16
All staff	Any	Not a level that is otherwise reportable to Child Safety	Family and Child Connect, may refer with consent or Principal, through to Family and Child Connect	CPA sections 13B and 159M
Principal	Any	Not a level that is otherwise reportable to Child Safety	Family and Child Connect, may refer without consent	CPA Sections 13B and 159M
Employing authority (Principal/Board)	Harm or likely harm due to the conduct of a teacher	When you start to deal with an allegation, and When you finish dealing with an allegation	Queensland College of Teachers	QCT sections 76 and 77
Any member of the public	Any	Significant harm, and Parent may not be willing and able	Child Safety	CPA section 13A
Any adult including students 18 years or older, parents/guardians and volunteers	A child sexual offence against a child by an adult	Gains information that causes the adult to believe on reasonable grounds, or ought reasonably to cause the adult to believe, that a child sexual offence is being or has been committed and (b) at the relevant time, the child is or was— (i) under 16 years; or (ii) a person with an impairment of the mind.	Police as soon as reasonably practicable after the belief is, or ought reasonably to have been, formed	Criminal Code section 229BC

Who	What abuse	Test	Must Report to	Legislation
All workers	Reportable allegation or reportable conviction by a worker	Reasonable belief that a worker has committed— reportable conduct; or misconduct that may involve reportable conduct. It is irrelevant whether or not the conduct or misconduct is alleged to have occurred in the course of the worker performing work for the school (entity).	Head of Entity or their delegate, as soon as practicable. Where the allegations involve the Head of Entity, the notification must be made to the QFCC. May also go to a director of the governing body.	CSO Act section 33
Head of the Reporting Entity (Head of Entity) or their delegate	Reportable allegation or reportable conviction by a worker	Reasonable belief that a worker has committed— reportable conduct; or misconduct that may involve reportable conduct. It is irrelevant whether or not the conduct or misconduct is alleged to have occurred in the course of the worker performing work for the school (entity).	QFCC initial notification within 3 business days. QFCC either interim or final report, within 30 business days.	CSO Act sections 34, and 30(1)(c)
Any person	Reportable allegation or reportable conviction by any worker	Reasonable belief that any worker has committed— reportable conduct; or misconduct that may involve reportable conduct. It is irrelevant whether or not the conduct or misconduct is alleged to have occurred in the course of the worker performing work for the school (entity) or any other entity.	May report to QFCC at any time.	CSO Act section 33(4)