



Reporting Concerns of Harm & Abuse Policy

Purpose:	The purpose of this policy is to provide written processes about – (a) how the school will respond to harm, or allegations of harm, to students under 18 years; and (b) the appropriate conduct of the school's staff and students (c) to comply with accreditation requirements.	
Scope:	Students and employees, including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements at Discovery Christian College.	
Status:	Approved	Supersedes: Reporting Concerns of Harm & Abuse Policy 2026
Authorised by:	School Governing Body Chairperson	Date of Authorisation: 10/07/2026
References:	• <u>Child Protection Act 1999 (Qld)</u> • <u>Child Protection Regulation 2023 (Qld)</u> • <u>Child Safe Organisations Act 2024 (Qld)</u> • <u>Criminal Code Act 1899 (sections 229BB and 229BC)</u> • <u>Education (General Provisions) Act 2006 (Qld)</u> • <u>Education (General Provisions) Regulation 2017 (Qld)</u> • <u>Education (Accreditation of Non-State Schools) Act 2017 (Qld)</u> • <u>Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)</u> • <u>Education (Queensland College of Teachers) Act 2005 (Qld)</u> • <u>Working with Children Act 2000 (Qld)</u> • <u>Work Health and Safety Act 2011 (Qld)</u> • Discovery Christian College Complaints Handling Policy • Discovery Christian College Work Health and Safety Policy • Discovery Christian College Student Safety and Wellbeing Policy • Discovery Christian College Child Protection Reporting Form	
Review Date:	Annually, or as appropriate, to reflect changing legislation and environment.	Next Review Date: January 2027
Policy Owner:	School Governing Body (EMC)	

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 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

Discovery 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

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:

- Mr Todd Shultz, Student Wellbeing Officer;
- Mrs Melissa Eckel, Student Wellbeing Officer;
- Mr Jonathan Garrett, Head of Secondary;
- Mrs Jodie Smith, Head of Primary; or
- Mr Josh Counsel, Principal³.

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 member of the school's governing body⁴ via email (board.chair@discovery.qld.edu.au). Reports will be dealt with under the school's Complaints Handling Policy.

Reportable Conduct Scheme Obligations

The school 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;

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

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

- 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

Queensland College of Teachers Obligations

The school 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 school begins dealing with an allegation of harm to a child involving a teacher, and again as soon as practicable once the school's dealings with the allegation are concluded.⁷

A notice when the school 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

⁶ *Child Safe Organisations Act 2024 (Qld) s.35*

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)*

Reporting Sexual Abuse⁹

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 school, that any of the following has been sexually abused by another person:

- a) a student under 18 years attending the school;
- b) a kindergarten aged child registered in a kindergarten learning program at the school;
- c) 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 school; and
 - ii. is not enrolled in the preparatory year at the school.

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

The school'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 Discovery 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 school's governing body **immediately** via email (board.chair@discovery.qld.edu.au).

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;
- 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 abuse¹⁰.

⁹ *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2)(c)*

¹⁰ *Education (General Provisions) Regulation 2017 (Qld) s.68*

Reporting Likely Sexual Abuse¹¹

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 school, that any of the following is likely to be sexually abused by another person:

- a) a student under 18 years attending the school;
- b) a kindergarten aged child registered in a kindergarten learning program at the school;
- c) 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 school; and
 - ii. is not enrolled in the preparatory year at the school.

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

The school'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 school'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 school's governing body **immediately** via email (board.chair@discovery.qld.edu.au).

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 abuse¹².

¹¹ *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2)(c)*

¹² *Education (General Provisions) Regulation 2017 (Qld) s.69*

Responding to Harm¹³

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.

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 suspicion¹⁴;
- 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 relates¹⁵.

Child Safety Regional Intake Service Contact Details

Gladstone Child Safety Service Centre

Address: 162 Goondoon Street Gladstone Qld 4680

Postal address: PO Box 536 Gladstone Qld 4680

Phone: (07) 4843 7500 or; outside hours: 1800 177 135

CPIU Gladstone

Cpiu.gladstone@police.qld.gov.au

Phone: 07 4971 3244

¹³ Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16 (1) and(2)(d)

¹⁴ Child Protection Act 1999 s.13G (2)(a)

¹⁵ See Child Protection Regulation 2023 (Qld) s.4 "Information to be included in reports"

Harm caused by psychological or emotional abuse or neglect

When the school 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.

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 Report¹⁸

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 school. 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 Protect¹⁹

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 school 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, through relevant employee handbooks, through staff meetings and training and during the staff induction process. Students are advised of the reportable offences at College assemblies and during Pastoral Care classes²⁰.

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)*

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)*

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 school administration²¹.

Training

The school will train its staff in processes relating to the health, safety and conduct of staff and students on their induction and will refresh training annually²².

The Executive Management Committee (Board) will be notified of this training and will be provided evidence of its completion. This may include, staff meeting agendas, staff induction agendas, child safety training completion certificates during the annual review of this policy and the Child Risk Management Strategy.

Implementing the Processes

The school will ensure it is implementing processes relating to the health, safety and conduct of staff and students by auditing compliance with the processes annually²³.

All staff conduct mandatory site-specific training annually and complete mandatory online training via an external provider. Child Protection training is also included in the College's induction process. A register of completion is kept and updated as required.

Complaints Procedure

Suggestions of non-compliance with the school's processes may be submitted as complaints under the College's Complaints Handling Policy²⁴.

²¹ *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(b)*

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)*