CHILD AND YOUTH RISK MANAGEMENT STRATEGY

1. Statement of Commitment

Villanova College supports the rights of children and young people and is committed to ensure the safety, welfare, and wellbeing of all children. Villanova College is therefore committed to responding to allegations of harm resulting from the conduct or actions of any person including that of employees.

This commitment includes the provision of a safe and supportive living and learning environment for all children and young people and requires all employees, volunteers and visitors to model and encourage behaviour that upholds the dignity and protection of students from harm.

In support of this commitment, Villanova College is dedicated to its Child and Youth Risk Management Strategy which includes having relevant policies, procedures, and training in place to effectively address the safety and wellbeing of students in their care.

2. Code of Conduct

Villanova College has developed codes of conduct and standards of behaviour for employees, students, volunteers (including parents) and other personnel in consultation with relevant parties. These codes of conduct set out the College's

requirements in relation to the conduct of employees who work at Villanova College, together with students, volunteers, and other personnel at the College.

As well as following these codes of conduct, Villanova College employees are also bound to comply with other relevant professional standards (e.g. the Australian Professional Standards for Teachers) which describes effective, contemporary practice for teachers.

The Villanova College Employee Code of Conduct sets out the standard behaviour required by all employees working at the College. All Villanova College employees must comply with this Code of Conduct. This code forms part of the contract of employment for all persons employed by Villanova College, including on a temporary, casual, fixed term or continuing basis.

The Villanova College Employee Code of Conduct states that employees of the College must behave professionally at all times in their interactions with students and observe appropriate boundaries, behaviour and contact with students. In addition, the Code of Conduct covers the employees' duties in relation to risk management and duty of care obligations to students.

The Code of Conduct is uploaded on the Villanova College staff intranet as well as the Villanova Complispace online compliance program. The Principal at Villanova College undertakes Code of Conduct training for College employees at the time of induction for all new staff and at least biannually for all other staff, and where appropriate, uses the training materials provided by Villanova College.

The Villanova College Handbook for Volunteers outlines the standard of behaviour which is required of volunteers (including parents) and other personnel in their activities in the College, including the need to think and act safely and treat students and staff with respect.

Villanova College takes the following actions to ensure that the Handbook for Volunteers is implemented in the College community:
- All volunteers are given a copy of the Handbook for Volunteers
- All volunteers are required to comply with the Handbook for Volunteers to continue their engagement at the College
- Ensuring all volunteers have signed the agreement stating that they have read and understood the Villanova College Handbook for Volunteers (this signed declaration is retained on file at Villanova College as evidence that training has been completed)

Villanova College Employee Code of Conduct
Villanova College Handbook for Volunteers
Villanova College Complispace online compliance program
Villanova College Staff Dress Code 2020

Villanova College Social Network and Social Media Guidelines for Staff
Villanova College Social Network and Social Media Guidelines for Parents

3. Recruitment Selection Training Management

Villanova College is responsible for staff recruitment, selection. Training and management of employees at the College. Villanova College aims to recruit and select employees that work with students who are appropriately qualified and suitable for working with children and young people.

Only members of the College Leadership Team are authorised to conduct recruitment practices on behalf of the College. The Principal/Deputy Principal oversee this process.

In advertising positions for the College, job advertisements will:
- Contain a clear statement about the College's mission and commitment to child safety
- Specify the experience and qualifications required for the role, including whether teacher registration or a Blue Card is necessary for the successful candidate
- Specify the College's requirements for referee and identity checks and for disclosure by the candidate of any information relevant to their eligibility or suitability to engage in activities involving children.
- Advertisements will state "This position involves working with children. The appointment of a successful applicant will be subject to satisfactory employment screen for child related employment in accordance with the law."

Villanova College adheres to Villanova College policies and procedures in relation to employment which are contained in the Working with Children (Risk Management and Screening) Act 2000, Working with Children (Risk Management and Screening) Regulation 2011, Education (Accreditation of Non-State Schools) Act and Regulation 2001, and the Education (Queensland College of Teachers) Act 2005.

All non-teaching employees working at Villanova College are required to comply with Blue Card Screen Procedures under the Working with Children (Risk Management and Screening) Act 2000.

The Principal is required to ensure that all new employees at Villanova College are provided with induction training on the College's processes and procedures, the College values and expectations and the standard of behaviour required of employees in their interactions with students, to support Villanova College to provide an environment that is safe and supportive for students.

All staff at Villanova College are required to complete online training in Student Protection Processes, Student Duty of Care and Privacy every year. Student Protection training covers requirement s under the Student Protection Processes in relation to reporting by staff of suspicions or allegations of:

- sexual abuse/ likely sexual abuse of students
- harm or risk or harm to students caused by physical abuse, sexual abuse, emotional abuse, or neglect; and
- inappropriate behaviour of staff to students

This training provides the staff at Villanova College with strong skills to effectively respond to and report suspicions or allegations, as required by law. New employees must complete this training within one week of commencing work at the College. Additional on-going training is provided by the College and all employees are encouraged to attend. Further to this, Villanova College encourages its staff to attend professional learning courses. Many of the courses offered to employees relate to the safety and wellbeing of students.

Where there is a complaint or allegation in relation to an employee of inappropriate behaviour, unsatisfactory performance or misconduct, the Principal will take all appropriate management action, which may include requiring employees to undertake additional training, mentoring employees explaining College expectations and requirements to the employee or ultimately dismissal.

Villanova College provides an Employee Assistance program to give free and confidential counselling to employees (and their families) who require support.

Villanova College Recruitment and Selection Policy
Villanova College Procedures for the Recruitment and Selection of Staff
Villanova College Recruitment and Selection Guidelines
Villanova College Disputes and Complaints against members of the Villanova College Community Policy and Procedures
Villanova College Complispace online compliance program

4. Disclosures or Suspicions of Harm

Villanova College's Student Protection Policy and Procedures provide a process for all staff who work at the College to recognise, respond, and report allegations of suspicions of:

- Sexual abuse/likely sexual abuse of students
- Harm or risk of harm to students caused by physical abuse, sexual abuse, emotional abuse, or neglect; and
- Inappropriate behaviour of staff to students

The Student Protection Processes have been developed in accordance with the requirements of the Education (Accreditation of Non-State Schools) Act and Regulation 2001, the Education (General Provisions) Act and Regulation 2006, the Working with Children (Risk Management and Screening) Act 2000 and Working

with Children (Risk Management and Screening) Regulation 2011, the Child Protection Act 1999 and the Education (Queensland College of Teachers) Act 2005. Student Protection Policies and Procedures are readily available for employees, parents, students and carers and Villanova College on the Villanova College website https://www.vnc.qld.edu.au/our-college/policies-and-documents/ and the Complispace online compliance program.

Villanova College has developed a complaints procedure to enable parents or students at the College to make a complaint that the College has not complied with the Student Protection Policy and Procedures.

If a person has a concern that a staff member of Villanova College has not properly followed the processes within the Villanova College Student Protection Policy and Processes, then that person is able to make a complaint.

Villanova College is not able to respond to any decision or action taken by a staff member of the Police or Child Safety. However, a complaint regarding a staff member of Villanova College not properly following the processes with the Student Protection Policy and Processes will be treated seriously and attended to as soon as possible.

Villanova College has documented Villanova College Disputes and Complaints against members of the Villanova College Community Policy and Procedures. This document is publicly available via the Villanova College website of https://www.vnc.qld.edu.au/our-college/policies-and-documents/.

Where the complainant considers that it may not be appropriate for the complaint to be made to the Principal of Villanova College or his or her delegate, the complaint may be made to the Chair of the Villanova College Board.

Villanova College welcomes the opportunity to improve its capacity for student protection which complaints may highlight.

In accordance with the Education (Accreditation of Non-State Schools) Regulation 2001, Villanova College has nine Student Protection Contacts to whom a student can report behaviour of another staff member that the student considers is inappropriate.

The Principal is a Student Protection Contact at the College. The other Student Protection Contacts are staff members at the College. The role of the Student Protection Contact is to receive complaints and allegations from staff and students and to make or assist staff to make all reports as outlined in the College's Student Protection Processes. The identity of the Villanova College Student Protection Contacts is made known to staff, students, volunteers and parents through the College website, the Villa View (weekly College newsletter), posters displayed throughout the College and/or Parent Information evenings.

Information about the Student Protection Contacts and requirements for their appointment is detailed within the Villanova College Student Protection Processes.

Villanova College Student Protection Policy
Student Protection Processes for Villanova College
Student Protection Guidelines for Villanova College
Villanova College Disputes and Complaints against Members of the Villanova College Community Policy
Villanova College Student Protection Contacts
Villanova College Staff Anti-Discrimination, Sexual Harassment and Bullying Policy
Villanova College Complispace online compliance program

5. A Plan for Managing Breaches of the Child and Youth Risk Management Strategy

Villanova College takes any breach fo the Villanova College Child and Youth risk Management Strategy seriously. Breaches may be dealt with as follows:

- If the alleged breach relates to the actions of an employee, this will be managed, as appropriate, in accordance with the   Villanova College *Disputes and Complaints against Members of the Villanova College Community Policy*
- If the alleged breach relates to a report of inappropriate behaviour of a staff member to a student, this will be managed in accordance with the process set out in the *Villanova College Student Protection Policy and Processes*
- If the breach relates to a complaint made via Complaints Procedures, that complaint will be dealt with by the Principal or the Chair of the Villanova College Board
- If the breach relates to the actions of a volunteer, this will be dealt with in accordance with the *Villanova College Volunteer Handbook* and the procedures set out in the *Student Protection Policy and Processes*, as appropriate
- If the breach relates to the action of a contractor, this will be managed in accordance with Villanova College's contract with the contractor

Villanova College Student Protection Policy
Student Protection Processes for Villanova College
Student Protection Guidelines for Villanova College
Villanova College Disputes and Complaints against Members of the Villanova College Community Policy
Villanova College Staff Anti-Discrimination, Sexual Harassment and Bullying Policy
Villanova College Whistleblower Policy and Procedures
Villanova College Complispace online compliance program

6. Policies and Procedures for Compliance with the Blue Card System

Villanova College complies with Blue Card Screen Procedures which detail requirements in accordance with the Working with Children (Risk Management and Screening) Act 2000 to ensure that the required personnel hold and maintain a current Blue Card.

All employees, volunteers and trainee students who work at Villanova College are required by the College to obtain and hold a Blue Card (unless exempt by legislation), including:

- All College based Villanova College employees who are not registered with either the QCT or the Australian health Practitioner Regulation Agency
- Volunteers
- Preservice teachers undertaking practical teaching sessions as part of compulsory academic course requirements
- Self-employed people, paid employees and volunteers whose usual duties include, or are likely to include, the teaching, coaching, or tutoring of a child, individually on a commercial basis
- Students who undertake formal traineeships as part of their studies which involve work in child related employment, including conducting sport and recreation activities directed at children, and College Board Members

Under current legislation, current parents/legal guardians of the College are not required to hold a Blue Card. However, if you are volunteering in tasks that are unsupervised or have the potential to be (such as Sports Coaches or Musical Production support) you will require a Volunteer Blue Card regardless of whether you are a parent/legal guardian due to the supervisory and student protection requirements. All other volunteers must hold a current Blue Card prior to commencing any work at Villanova College. Blue Cards must be linked to Villanova College. Further information can be obtained from the Villanova College HR Manager on 3394 5511.

A centralised register of Blue Card information for all paid employees, is maintained by Villanova College.   The College ensures that details of any Blue Card renewals, applications and changes in status are recorded in this register.

All teachers employed by Villanova College must be registered with the QCT. The Principal of Villanova College, or his or her delegate sights the original certificates of registration and qualifications before employment commences at the College. The Principal ensures that new non-teaching employees hold a Blue Card prior to commencing work at the College. The No Card, No Start legislation commenced on 31 August 2020.

Villanova College maintains a register of Blue Card information for all volunteers. Volunteers who require a Blue Card under the Working with Children (Risk Management and Screening) Act 2000 must obtain the Blue Card prior to commencing work at Villanova College.

It is an offence for a *restricted person* to start or continue working or volunteering in restricted employment. For further details, please refer to the Queensland Government, Blue Card Services website.

Online and Volunteer Induction and Registration Process

Volunteers will be required to complete their Annual Induction and Volunteer Registration, before engaging in volunteering activities at the College. You can access this process on our website: www.vnc.qld.edu.au – Volunteering at Villanova.

This process captures the Volunteer contact and emergency contact details, provides options and volunteer areas of interest for the volunteer to select and will prompt the Volunteer as to whether they require a Working with Children Check (Blue Card) and COVID-19 Vaccination depending on the QLD Health Directive and Mandates. Please refer to the below table in terms of Blue Card, Compliance Training and COVID-19 Vaccination requirements.

Villanova College Blue Card System Policy
Villanova College Blue Card System Guidelines
Villanova College Privacy Policy
Villanova College Blue Card Register
Villanova College Complispace online compliance program

7. A Risk Management Plan for High-Risk Activities and Special Events

Villanova College considers all curriculum activities in terms of their inherent level of risk. When undertaking high risk activities or special events, the College is responsible for identifying potential risks and considering the safety, wellbeing, and risk of harm to students and staff.

Villanova College develops and implements an effective risk management plan to remove or minimise the risk of harm to students and staff. This plan includes risk assessments and risk mitigation which are carried out for all activities within the College and all activities undertaken outside of the College. The College document Villanova College Procedures for the Risk Management of High-Risk Activities and Special Events provides safety leadership advice that applies to the higher risk curriculum activities conducted by Villanova College.

Villanova College refers to information in relation to risk assessments for various activities and risk assessment tools provided on the College's staff intranet and the Complispace online compliance program.

A Workplace Health and Safety Officer (WHSO) is employed at Villanova College. The WHSO"s role is to support the Principal in carrying out the health and safety responsibilities under legislation. Villanova College provides training and updates to the WHSO.

The Villanova College Workplace Health and Safety Committee also holds regular meetings throughout the school year.

Villanova College has developed a Contractor Induction Manual to give contractors information on the College's Workplace Health and Safety Contractor Management System. It is expected that contractors working at Villanova College play an active role in maintaining a safe environment for staff and students.

The Dean of Teaching and Learning is responsible for approving all excursions. The Dean of Teaching and Learning, when reviewing and assessing excursion and camp risk assessments, refers to the Villanova College Procedures for the Risk Management of High-Risk Activities and Special Events and the Complispace online compliance program, as a guide in identifying, assessing and managing risks associated with each excursion or camp. Excursion coordinators complete the Villanova College Activity Proposal and Risk Assessment or Villanova College Campus Activity/Variation to Day Proposal prior to each excursion. These forms specify that in carrying out risk assessment, student protection risks must be assessed and managed.

Other strategies to Minimise Risks of Harm
Villanova College takes seriously its commitment in relation to the safety and protection of students and has developed policies and procedures to manage risks of harm to students.

Supervision – Villanova College manages the supervision of students appropriately to ensure that there are adequate numbers of staff actively engaged in the monitoring of students. The College has appropriate supervision ratios to ensure the safety of students.

Supervision Arrangements - The supervision of students is based on a map of the College which identifies specific areas for staff supervision of students during the school day. At least one teaching staff member is allocated to each area before school and during meal break times. A minimum of two staff members must accompany staff members on day excursions and at least one of those staff members must be First Aid qualified.

Drop Off and Collection of Students - Drop off and pick up is located outside College grounds on Fifth Avenue (Middle School) and Eighth Avenue (Junior and Senior School). A staff member supervises eighth Avenue each school afternoon until 3.30pm. There are also two staff members rostered on to supervise Sixth Avenue (bus stops) in the afternoon from 3pm – 3.30pm.

Procedure to be Followed in the Event a Student is Not Collected (Eighth Avenue) - The teacher on duty brings all uncollected Junior School students to Junior School Administration where the Junior School Student Services Officer contacts the parent/caregiver. A staff member will remain with the student until collected. Middle and Senior School student procedures are governed by the student's age and circumstances.

Procedure to be Followed in the Event a Person Responsible for the Collection of a Student is Deemed Unable (for example, intoxication) - Where it is identified that the person collection a student is incapable of exercising their duty of care, either through intoxication or other impediment, a member of staff will take the student to a Student Services Office where a member of the College Leadership team will action student protection strategies. This may involve contacting the Queensland Police Service or another relevant agency.

Emergency - Villanova College ensures that all employees are briefed to appropriately handle emergency situations and critical incidents in accordance with Villanova College's   Procedures for Responding to Critical Incidents. All staff are given an Emergency Procedures card, which must be worn with their College photographic identification.

Fire/Lockdown - Villanova College ensures that all employees and volunteers are made aware of fire evacuation and lockdown procedures at the College. Emergency evacuation and lockdown drills are conducted each semester as part of staff, student, and volunteer preparedness for emergency situations.

Visitors/Outsiders - Villanova College has procedures in place for the management of visitors and other outsiders, including relevant signage and directions, together with a visitor sign-in register and procedures for signing in and out of the College. The College also has a designated internal telephone number (514) which can be used by all staff in the case of an emergency.

Media/Communication Strategies - Villanova College obtains the permission of parents (using the Villanova College Media Consent Form – completed at time of enrolment) for the use of student photographs and names in any materials issued to the public in printed or electronic form. A register of students without this permission is kept by the Villanova College Enrolments Officer and the Villanova College Communications Manager.

Identifying information of students is not used in promotional material without the specific permission of the parents and the students concerned. Villanova College obtains the specific informed consent of parents for any publication of names and photos of students in the media outside of the College.

ICT Procedures - Villanova College has specific guidelines relating to the use of College-owned computers and student-owned computers and devices used at the College. The Villanova College Acceptable Use of College ICT Resources serves to inform all users of their rights, responsibilities and obligations when using computer and network resources, consistent with the College's requirements that all such resources are used in an ethical, legal, and responsible manner.

The Villanova College Acceptable Use of College ICT Resources is to be signed yearly.

Cyber safety posters are located in all classrooms at Villanova College, and the Villanova College – Action Flow Chart (student cyber safety) is accessible to all staff, parents, and students.

Counselling Service - Villanova College provides free counselling services for its students as part of its Pastoral Care Program. These services are provided by qualified staff employed by the College.   The Villanova College Disclosure Statement to Student and Parent Consent is to be signed by parents and students (age appropriate) prior to any counselling services being offered.

Transport of Students by Staff - There may be a requirement during the normal activities of Villanova College where students need to be taken to another place by private or College owned vehicle.

Villanova College has in place the Transporting Students in Private and College Owned Vehicles Guidelines which are located on the Complispace online compliance program for easy staff access.

Student Drivers - Students may only drive to and from the College with the express permission of their parents and the College (as per the Villanova College Driver Permission Form and Villanova College Passenger Permission Form).

Students may only carry those passengers approved by the College and listed on their Villanova College Driver Permission Form and Villanova College Passenger Form and may only carry them to and from school.

Should a student fall ill or sustain an injury during the school day (including before/after school sports training, a parent/carer must be notified to organise collection of the student. The student is not permitted to drive home).

Managing Injuries, Allergies, or Illnesses - Villanova College accesses and implements a range of procedures, guidelines, forms, and resources to effectively manage injuries, allergies, and illness. All documents are available to staff, and parents can access relevant forms via the Villanova College Parent Lounge.

To ensure the College's duty of care, each year, staff are invited to undergo First Aid training, by attending a full day session of professional development which is fully reimbursed by the College.

As per legislation, First Aid (HLTAID003 Provide First Aid) is required to be completed every three years, while CPR (HLTAID001 CPR only) training is required to be completed each year. This also involves on-line learning, which staff are required to complete prior to attending the relevant course.

Bathrooms, Toilets and Changing Rooms – Villanova College has a range of protocols in place to ensure that student amenities are accessible and supervised:
- Staff on duty before school and during meal breaks supervise common areas including student bathrooms, toilets and changing rooms
- Any staff member needing to enter student amenities are to announce their intention to enter and the reason for entering
- Where possible, staff entry to student amenities should be gender sensitive (i.e. only male staff entering male toilets)
- Staff members are trained in student protection strategies and follow the *Villanova College Employee Code of Conduct* when interfacing with students in isolated locations. This includes, where possible, having two staff members present when entering student amenities
- At no time are staff, volunteers, and parents to use student amenities

COVID-19

The Villanova College website provides updates and advice in relation to Villanova College's response to the COVID-19 pandemic.

In order to ensure Villanova College delivers an informed and comprehensive response, the College Leadership Team is briefed by Queensland Health, Education Queensland and is supported by the Queensland Catholic Education Commission.

All staff were provided with and required to sign the *Villanova College Working From Home Procedures* which are also available via the Complispace online compliance program.

Students and parents/care givers were provided with the *Villanova College Learning@Home Expectations and Guidelines for Junior, Middle and or Senior School Students* as applicable. These documents are also available on the Villanova College website.

All parents/caregivers have been regularly informed via email correspondence from the Principal. Copies of these communications are available on the Villanova College Parent Lounge.

Confidential Management of Student Information - All staff are required to handle private and confidential information in relations to students and parents/guardians in accordance with privacy legislation, the *Villanova College Privacy Policy*, and the *Villanova College Employee Code of Conduct*. Staff are required to complete online Privacy training yearly.

Privacy information and confidentially is also included in the *Villanova College Handbook for Volunteers.*

Villanova College Procedures for the Risk Management of High-Risk Activities and Special Events
Villanova College Activity Proposal and Risk Assessment
Villanova College Campus Activity/Variation to Day Proposal
Villanova College Managing Risks in College Activities
Villanova College Transporting Students in Private and College Owned Vehicles Guidelines
Villanova College Driver Permission Form
Villanova College Passenger Permission Form
Villanova College Parent Lounge
Villanova College Acceptable Use of College ICT Resources
Villanova College Action Flow Chart – Student Cyberbullying
Villanova College Complispace electronic incident reporting
Villanova College First Aid Guidelines
Villanova College Student Ambulance Procedures and Guidelines
Villanova College Concussion Guidelines
Villanova College Administering Student Medication Consent Form
Villanova College Change to Student Medication Consent Form
Villanova College - Register of Student Medication
Villanova College Student Asthma Record
Anaphylaxis Action Plans
Villanova College Handbook for Volunteers
Villanova College Learning@Home Expectations and Guidelines for Junior School Students
Villanova College Learning@Home Expectations and Guidelines for Middle School Students
Villanova College Learning@Home Expectations and Guidelines for Senior School Students

Villanova College Complispace online compliance program

8. Communication and Support

All Villanova College policies, procedures and guidelines are available to staff, parents, students on the Villanova College website, Villanova College staff intranet, Villanova College Complispace online compliance program and the Villanova College Parent Lounge. Parents also receive daily/weekly updates via the Villanova College App and the Villa View (weekly College newsletter).

Villanova College Complispace online compliance program
Online Child Protection, Student Duty of Care and privacy training for all staff and volunteers
Child Protection posters visible in all areas of Villanova College (including names of Student Protection Contacts)
Student Protection Processes for Villanova College
Student Protection Guidelines for Villanova College
Villanova College Employee Code of Conduct
Villanova College Handbook for Volunteers
Villanova College Code of Conduct for Volunteers
Villanova College Information for Families
Villanova College Whistleblower Policy and Procedures
Documentation readily available on the Villanova College website
Villa View (weekly newsletter)
Villanova College Parent Lounge for delivery of parent information
Villanova College App
Professional Development training available to all staff
Regular meetings between the Principal, Deputy Principal and Villanova College Compliance Officer

Procedures for reviewing the Child and Youth Risk Management Strategy

To ensure that the Villanova College Child and Youth Risk Management Strategy remains current and effective, this strategy will be monitored and reviewed annually.

In the event that Villanova College identifies concerns, particularly following an incident, Villanova's Child and Youth risk Management Strategy will be reviewed.

Issues to be considered in a review would include:

- Whether policies and procedures were followed
- Whether any incidents relating to children and young people's risk management issues occurred
- The actual process used to manage any incidents
- The effectiveness of Villanova College's policies and procedures in preventing or minimising harm to children and young people; and
- The content and frequency of training in relation to Villanova College's Child and Youth Risk Management Strategies

Following such a review, employees, parents, and volunteers at Villanova College will be advised of any changes to Villanova College's policies and procedures, and where appropriate, training will be provided.