

Townsville State High School

P&C Association

Student Protection

Risk Management Strategy 2026

This Strategy is effective from 17 March 2026 (date endorsed) and is to be reviewed and updated annually in time for endorsement at the following AGM. This is an annual requirement of the P&C Association.

Review Date: 16 March 2027

Disclaimer:

This Strategy has been developed to meet the P&C Association's obligations under the Child Safe Organisations Act 2024 (Qld), which requires organisations working with children to implement the Universal Principle and 10 Child Safe Standards as regulated by the Queensland Family and Child Commission (QFCC).

It also fulfils our ongoing obligations under the Working with Children (Risk Management and Screening) Act 2000 (Qld) (Blue Card Act), including the requirement for a child and youth risk management strategy, and aligns with the Department of Education's Student Protection Policy, Student Protection Procedure, and Allegations Against Employees Procedure.

Townsville State High School P&C Association

Effective Date: 17 March 2026

Review Date: 16 March 2027

Purpose This Child Safe Organisation Policy and Student Protection Risk Management Strategy (the "Strategy") is developed by the Townsville State High School P&C Association ("the P&C Association") to ensure the safety and wellbeing of all children and young people involved in P&C activities and environments.

It serves to:

- Comply with the legislative requirements of the *Working with Children (Risk Management and Screening) Act 2000 (Qld)* and the *Working with Children (Risk Management and Screening) Regulation 2020 (Qld)*.
- Align with and support the Department of Education's Child and Student Protection Policy and Student Protection Procedure.
- Implement the Queensland Child Safe Standards as outlined in the "Guidelines for Implementing the Universal Principle and Child Safe Standards in Queensland" issued by the Queensland Family and Child Commission (QFCC).
- Provide a clear framework for all P&C Association members, volunteers and employees regarding their responsibilities and expected behaviours in creating a child-safe environment.

Scope This Policy applies to all P&C Association members, volunteers, paid staff and any other individuals involved in P&C activities, programs, and services, whether on school grounds or at off-site P&C organised events.

Our Commitment to Child Safety and Cultural Safety The P&C Association is committed to creating and maintaining a child-safe environment for all children, ensuring that their safety, wellbeing, and rights are a primary consideration in all activities and decision-making processes. This commitment is underpinned by the Universal Principle of Cultural Safety and the 10 Child Safe Standards, as regulated by the QFCC.

The Universal Principle: Cultural Safety for Aboriginal and Torres Strait Islander Children The P&C Association acknowledges the unique vulnerabilities and experiences of Aboriginal and Torres Strait Islander children and is deeply committed to ensuring their cultural safety. This commitment is paramount and will be embedded in all aspects of our operations.

Implementation of the Reportable Conduct Scheme (commencing 1 July 2026)

The P&C Association will comply with the new Reportable Conduct Scheme, including obligations to:

- Notify the head of the entity (P&C President) of any reportable allegation
- Ensure systems exist for receiving and escalating concerns
- Cooperate with QFCC, Blue Card Services, and the Department of Education regarding investigations

Note: This Scheme does not require P&C volunteers or members to investigate allegations. All investigations are undertaken by QPS, Child Safety, DoE Integrity, or other authorised bodies.

The 10 Child Safe Standards

The P&C Association commits to embedding the 10 Child Safe Standards in all its practices, policies, and procedures:

Standard 1: Child safety is embedded in our organisation's leadership, governance and culture.

- **Commitment:** Child safety and wellbeing are embedded in the P&C Association's leadership, governance, and culture. The P&C are explicitly committed to child safety, regularly reviewing and endorsing this Strategy.
- **Implementation:** The P&C Executive and members will publicly commit to children's safety and cultural safety, championing and modelling these values in all P&C activities. We foster an open and transparent culture where child safety is paramount, encouraging all personnel to raise concerns without fear of reprisal. Our annual checklist (see Appendix B) includes indicators for cultural embedding.

Standard 2: Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

- **Commitment:** Children are informed about their rights, participate in decisions affecting them, and are taken seriously.
- **Implementation:** We will use age-appropriate methods to inform children about their rights, including the right to feel safe and to be heard. We will seek children's input on relevant P&C activities where appropriate. All disclosures or concerns raised by children are responded to promptly, sensitively, and taken seriously, following established procedures.

Standard 3: Families and communities are informed and involved in promoting child safety and wellbeing.

- **Commitment:** Families and communities are informed and involved in promoting child safety and wellbeing.
- **Implementation:** We will foster open and transparent relationships with families and the school community, providing clear information about our child safety practices and encouraging their involvement. We collaborate with the school and other community organisations to promote a consistent approach to child safety.

Standard 4: Equity is promoted and diverse needs are respected in keeping children and young people safe.

- **Commitment:** Equity is upheld, and diverse needs are respected in policy and practice.
- **Implementation:** Our approaches will be tailored to reflect the diversity of children, families, and communities we serve, ensuring culturally safe, inclusive, and equitable practices for all children, including those with disabilities, from diverse cultural backgrounds, or with specific vulnerabilities. Our activity-specific risk management plans consider increased vulnerabilities for specific groups of children (e.g., children with disabilities) to implement appropriate safeguards.

Standard 5: People working with children and young people are suitable and supported.

- **Commitment:** Individuals working with children are suitable and supported to reflect child safety and wellbeing values.
- **Implementation:** All P&C personnel (employees and volunteers) who undertake child-related regulated activities must hold a valid Blue Card (or Exemption Card where applicable) and comply with the Working with Children (Risk Management and Screening) Act 2000 (Qld) requirements. Our "Blue Card Register" and "Volunteer Register" are maintained for this purpose. All P&C personnel are required to read, understand, and adhere to the "P&C Code of Conduct" and the "Standards of Behaviour Fact sheet" (see Resources Hub).

Standard 6: Processes for raising concerns and complaints are accessible, understood and responsive.

- **Commitment:** Processes for responding to complaints and concerns are child-focused.
- **Implementation:** We will have clear, accessible, and child-friendly procedures for raising concerns or making complaints, ensuring they are trauma-informed, culturally responsive, and allow for appropriate investigation and response. All complaints will be taken seriously and handled promptly and confidentially. View the Process for Responding to a Disclosure of Harm to a Child flow chart in Appendix D below.

Standard 7: Information about child safety and wellbeing is used to improve policies, procedures, and practices.

- **Commitment:** Staff and volunteers are equipped with the knowledge, skills, and awareness to keep children safe.
- **Implementation:** Mandatory training will be provided for all P&C members and volunteers on child protection, the Universal Principle, and the 10 Child Safe Standards. This will include recognising signs of harm and appropriate reporting procedures. We maintain records of child safety incidents, concerns, and complaints using the "Confidential Record of Child Harm Allegation" (see Resources Hub).

Standard 8: Risk management engages with the potential for harm in the physical and online environments.

- **Commitment:** We identify, assess, and take steps to minimise opportunities for children to be harmed across all P&C activities and environments (both physical and, where applicable, online).
- **Implementation:** We will regularly assess and manage risks in all physical spaces where P&C activities occur. For all P&C activities, particularly high-risk activities or special events, a "Student Protection Activity Risk Management Plan" (see Appendix C) must be completed to identify and mitigate specific child safety risks. Guidelines for safe online interactions, including social media and digital communications, will be established and followed.

Standard 9: Physical environments are safe for children and young people.

- **Commitment:** We ensure that physical environments where P&C activities take place are regularly assessed for safety hazards and risks to children. This includes appropriate supervision ratios and clear designated areas for activities.
- **Implementation:** We will establish mechanisms for regular review and evaluation of our child safety practices, seeking feedback from children, families, staff, and volunteers to continuously improve our approach.

Standard 10: The organisation's systems are regularly reviewed and improved to create and maintain a child safe environment.

- **Commitment:** Policies and procedures are reviewed and updated annually in time for endorsement at the Annual General Meeting (AGM). The "P&C Association Student Protection Annual Checklist" (see Appendix B) is completed prior to the AGM to ensure ongoing implementation and review of processes and procedures.
- **Implementation:** This Strategy, along with The P&C Code of Conduct (as per the Constitution), incident reporting forms, and other relevant policies, will clearly document our commitment and procedures for child safety, ensuring they are accessible and understood by all. A copy of the completed annual checklist must be provided to the Principal, fostering collaborative oversight.

Endorsement:

Signed: _____

[P&C President Name]

P&C President

Date: _____

Signed: _____

Murray James

Principal, Townsville State High School

Date: _____

Updated Student Protection and Risk Management Strategy

Purpose This Student Protection Risk Management Strategy (the Strategy) is developed by the Townsville State High School P&C Association ("the P&C Association") to ensure the safety and wellbeing of all children and young people involved in P&C activities and environments. This Strategy reinforces the P&C Association's commitment to providing a child-safe environment that protects children from harm or risk of harm.

Key Definitions

Child/Student: Any person under 18 years of age. (Consistent with definitions in the **Child Protection Act 1999 (Qld)**).

Harm: Any detrimental effect of a significant nature on the child's physical, psychological, or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect or sexual abuse or exploitation. This includes harm caused by a single act, omission, or a series of acts or omissions. (As defined in the **Child Protection Act 1999 (Qld)**).

Risk of Harm: Circumstances where there is a reasonable likelihood that a child may suffer harm. (Consistent with principles in the **Child Protection Act 1999 (Qld)**).

Immediately: In this context, 'immediately' means the report must be progressed without unreasonable delay, once a reasonable suspicion of sexual abuse or likely sexual abuse has been formed. (Source *Department of Education's Student protection procedure, for reporting under the Education (General Provisions) Act 2006 (Qld)*.)

Child Safeguarding: Proactive measures and processes undertaken by an organisation to prevent child abuse and neglect and to promote children's wellbeing.

P&C Activities: Any event, service, program, or operation organised or managed by the P&C Association, including but not limited to tuckshop operations, uniform shop, OSHC (if applicable), fundraising events, school discos, working bees, and meetings.

Blue Card: A screening clearance for individuals working with children in Queensland. This check, commonly known as a 'Blue Card', assesses a person's suitability to work with children in regulated child-related environments, aiming to protect children from harm or the risk of harm. It includes a continuous monitoring process by Blue Card Services. A valid Blue Card is required for all regulated roles. (As per the **Working with Children (Risk Management and Screening) Act 2000 (Qld)**).

Visitor: Any person, other than an employee, who, on a one-off or regular basis, visits a state school; or has contact with students or children off-site or online; in order to provide services to a state school. This includes volunteers and external contractors such as tradespeople, guest speakers, pre-service teachers and people assisting in the tuckshop, on excursions or at sporting activities. (As per the **Department of Education Student protection procedure and Working with Children Authority Procedure**).

QFCC: Queensland Family and Child Commission, the regulator for the **Child Safe Organisations Act 2024**.

Roles and Responsibilities

Creating and maintaining a child-safe environment is a shared responsibility. The P&C Association operates within the broader context of the school community and aligns with the Department of Education's framework for child and student protection.

P&Cs Qld (Peak Body Role):

- Provide overarching guidance, resources, training, and support to individual P&C Associations regarding child safeguarding best practices, the Universal Principle, and the 10 Child Safe Standards.
- Develop and disseminate updated policies, procedures, and templates for P&C Associations to adopt and implement. Facilitate training programs and access to professional development for P&C members and staff.

School Principal:

- As the leader of the school the Principal plays a crucial role in ensuring a child-safe environment.
- The Principal is responsible for implementing the department's **Child and Student Protection Policy** and **Student Protection Procedure** within the school, which extends to P&C activities conducted on school grounds.
- The Principal is a mandatory reporter under specific legislation (e.g., **Education (General Provisions) Act 2006 (Qld)**, **Child Protection Act 1999 (Qld)**, **Criminal Code Act 1899 (Qld)**) and must be notified immediately of child protection concerns.
- The Principal will work collaboratively with the P&C Association to ensure alignment of child safety practices.

P&C Association Executive (President, Vice President, Secretary, Treasurer):

- Champion child safety and cultural safety within the P&C Association and promote a child-safe culture (Standard 1).
- Ensure the P&C Association's compliance with this Strategy, relevant legislation (e.g., **Working with Children (Risk Management and Screening) Act 2000 (Qld)**), and alignment with Department of Education policies.
- **Executives responsible for an OSHC** - All executives responsible for an OSHC service are required to hold a **Business** Blue Card, regardless of whether they are a parent of a child currently enrolled at the school or not. **NOTE:** if the Executive is a teacher or police officer, they must obtain an Exemption Card.
- Oversee the implementation of child safeguarding policies and procedures within P&C activities.
- Maintain relevant registers (Blue Card Register, Volunteer Register).
- Ensure all P&C members, volunteers, and paid staff understand their child safeguarding responsibilities.
- Ensure appropriate Blue Card screening is in place for all regulated roles.

- Receive and manage child protection concerns and complaints in accordance with this Strategy and Department of Education procedures.
- Facilitate regular review and updating of this Strategy including ensuring annual review and endorsement of this Strategy at the AGM as per the constitution.

P&C Association Members, Volunteers, and Paid Staff:

- Read, understand, and comply with this Student Protection and Child Safeguarding Risk Management Strategy, the P&C Code of Conduct, and all related child safety policies and procedures.
- Uphold the Universal Principle and the 10 Child Safe Standards in all P&C activities and interactions with children.
- Complete mandatory student protection training as required by the P&C Association and School Principal.
- Be aware of the signs of harm or risk of harm to children and know how to respond and report concerns appropriately.
- Report any suspected harm or risk of harm to a child immediately, in accordance with the procedures outlined in this Strategy.
- Cooperate fully with any child protection investigations.
- Hold a valid Blue Card (or Exemption Card) where required.
- Model appropriate behaviour with children and always maintain professional boundaries.

Student Protection Activity Risk Management Plan

The P&C Association adopts a proactive approach to risk management, aiming to identify, assess, and mitigate potential risks of harm to children in all P&C activities and environments. This framework aligns with the Department of Education's Child and Youth Risk Management Strategy (CYRMS).

The Student Protection Activity Risk Management Plan records details of the risks identified for the life of the activity, their grading in terms of likelihood of occurring and seriousness of impact on the activity, initial plans for mitigating each high-level risk and subsequent results (see Appendix C below). Risks identified at a high level MUST be reported to the principal before the activity is approved. These plans are to be filed appropriately for easy reference or referral by the P&C President or Principal.

This plan will be a living document, reviewed regularly by the P&C Executive as required and annually as part of the overall Strategy review and adoption at AGM as per the P&C constitution.

Risk Identification: The P&C Association will identify potential risks of harm to children across all its activities, considering various contexts such as:

- Physical environments (e.g., tuckshop, uniform shop, event spaces).
- Online environments and digital interactions (e.g., social media, online communication).
- Recruitment and supervision of staff and volunteers.
- Event management (e.g., discos, fetes, excursions).

- One-on-one interactions between adults and children.
- Vulnerabilities of specific children (e.g., children with disability, Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds).
- Peer-to-peer harm.

Control Measures: The P&C Association will implement and maintain control measures to eliminate or minimise identified risks. These measures will directly support the implementation of the 10 Child Safe Standards and include, but are not limited to:

- **Safe Recruitment and Screening:** Strict adherence to Blue Card requirements and thorough following processes (Standard 5).
- **Clear Codes of Conduct:** Establishing and communicating clear behavioural expectations for all individuals involved in P&C activities (Standard 10).
- **Effective Supervision:** Ensuring appropriate levels of supervision for children during all P&C activities (Standard 8).
- **Training and Education:** Providing mandatory child safety and cultural safety training for all members and volunteers (Standard 7).
- **Accessible Reporting Mechanisms:** Ensuring clear and accessible pathways for children, families, and members to report concerns (Standard 6).
- **Physical Environment Safety:** Regular checks and maintenance of physical spaces to ensure they are safe for children (Standard 8).
- **Online Safety Protocols:** Guidelines for safe online communication and use of technology (Standard 8).
- **Emergency Procedures:** Clear procedures for responding to accidents, injuries, or critical incidents.
- **Regular Reviews:** Consistent monitoring of the effectiveness of control measures and updating of risk assessments.

A templated Student Protection Activity Risk Management Plan is available in Appendix C below.

Key Child Safe Procedures

The following procedures outline the P&C Association's specific actions to ensure child safety and meet its obligations, aligning with the Department of Education's **Working with children (blue Card) procedure, Child and Student Protection Policy, Student Protection Procedure, and the Allegations against employees in the area of student protection procedure.**

1. Recruitment and Screening of P&C Members, Volunteers, and Paid Staff (Standard 5)

- The P&C Association is committed to ensuring that all individuals who work with children in a regulated role within P&C activities are suitable and screened appropriately. To strengthen safeguards for children, new blue card requirements for P&C members came into effect on 20 September 2025.

- Child safe environments don't just happen. That's why it is important that Executive Committee members who make decisions about activities & services for children in Queensland hold a blue card.
- Executive Committee members are defined in the Association's Constitution and typically include the President, Vice President, Secretary and Treasurer. Follow the flow chart to see if you need a blue card.
- 1. What is your role? Are you an Executive Committee member who makes decisions about things that affect children, like excursions, learning programs, or the tuck shop? If so, you may need a blue card. See question 2 for more info. If your role doesn't involve children directly—such as fundraising or managing buildings—you don't need a blue card.
- 2. How often do you help with or are involved in making decisions about children? If it's only occasionally, you might not need a blue card. You don't need a blue card if you're involved in these decisions for seven days or less in a calendar year. This seven-day count resets annually every January 1, so you can probably attend monthly meetings until around July or August 2026 before needing a blue card—depending on when the meetings are held, following the completion of a [Restricted employment and restricted person declaration](#).
- 3. Does your P&C run an Outside School Hours Care (OSHC) service? If yes, all Executive Committee members must have a Business blue card. No exceptions apply, and this rule has not changed.
- 4. If you volunteer in other activities at the school that directly involve your child, for example, helping at the sports day or working in the tuck shop, you don't need a blue card except in limited circumstances. The volunteer parent exemption continues to apply.
- **Blue Card Requirement Paid Staff:** All P&C paid staff who are in regulated employment or engaged in a regulated business activity, as defined by the **Working with Children (Risk Management and Screening) Act 2000 (Qld)**, must hold a valid Blue Card or exemption card before commencing any work or activity involving children.
- **P&C Members** - Members who are **not** the parent of a student **currently enrolled** at the school must hold a valid volunteer blue card. This also applies to the P&C's Honorary Life Members and students over the age of 18 who become P&C members.
 - It is the individual's responsibility to apply for and maintain a current Blue Card.
- **Verification:** The P&C Executive will take reasonable steps to verify the identity and suitability of all individuals, even those not requiring a Blue Card for specific roles, through discussions, reference checks (where appropriate).
 - The P&C Executive will maintain a register of valid Blue Card details for all relevant individuals.
 - Individuals whose Blue Card status changes (e.g., suspended, cancelled) must immediately notify the P&C Executive and cease any regulated activities.
- **No Card – No Link – No Start**

A person must **not** commence regulated child-related work until:

1. Their Blue Card is issued, **and**
2. They are linked to the P&C Association in the Organisation Portal.

NOTE: The school and the P&C are separate entities and each entity needs to maintain their own Blue Card Register - all P&C volunteers and employees must be linked to the P&C's Organisation Portal.

- **Restricted Persons and Disqualification Framework**

The P&C Association must not employ, engage, or appoint:

- A **restricted person** in restricted employment
- Any person issued with a **negative notice**, suspended card, or disqualification

If the P&C becomes aware that a person is charged with or convicted of a disqualifying offence, or receives a negative notice, they must:

- Immediately remove the person from child-related duties
- Notify Blue Card Services
- Securely record the action taken
- **Induction and Training:** All new members, volunteers, and staff will undergo an induction process that includes a thorough overview of this Strategy, the P&C Code of Conduct, and No Card. No Link. No Start
- Linking is a critical step in the blue card system as it informs organisations if a card holder is no longer eligible to work with children.
- All blue card holders and applicants are monitored daily by the Queensland Police Service. If there is a change in a person's police information, the P&C are notified and will assess whether the person should retain their blue card as directed.

Further information is available at [Blue cards for Parents and Citizens and Parent and Friends associations | Your rights, crime and the law | Queensland Government](#)

[Working with children \(blue card\) procedure](#)

2. Code of Conduct (Standard 10)

The P&C Code of Conduct (as per the P&C Model Constitution) places an obligation on all P&C members, volunteers and employees to take responsibility for their actions. The Code of Conduct provides direction and guidance on responsibilities and the expected standards of behaviour while undertaking activities that reflect on the school and the P&C Association.

P&C Members and Volunteers are expected to also abide by all expectations outlined in the school's Parent and Community Code of Conduct if the school has one.

- **Dissemination and Acknowledgment:** The Code of Conduct will be readily available to all members, volunteers, and staff. All individuals are required to read and acknowledge their understanding and commitment to the Code of Conduct. Members acknowledge and sign this agreement as part of the standard P&C membership form.

- **Breaches:** Any breach of the Code of Conduct will be taken seriously and managed in accordance with the P&C Qld constitution and may lead to disciplinary action, including removal from P&C activities or membership, and where appropriate, reporting to external authorities.

The P&C Code of Conduct and Standards of Behaviour Fact Sheet are available in the Resource Hub.

3. Responding to Concerns and Complaints (Child-Focused) (Standard 6)

The P&C Association is committed to promptly and appropriately responding to all concerns, suspicions, or allegations of harm or risk of harm to a child. Our procedures are designed to be child-focused, trauma-informed, and culturally responsive, and align with the Department of Education's policies and procedures for student protection.

3.1. Recognising and Responding to Suspected Harm

All P&C members, volunteers, and paid staff have a responsibility to be aware of the signs of harm and risk of harm to children. This includes physical, sexual, emotional abuse, and neglect, as well as peer-to-peer harm.

What is harm: Any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect or sexual abuse or exploitation. Harm can be caused by a single act, omission or circumstance or a series or combination of acts, omissions or circumstances. **(s.9 of the Child Protection Act 1999 (Qld))**

*If there is immediate danger to a child, the P&C member or volunteer must call **000** first, then inform the Principal as soon as safe to do so.*

"Listen, Believe, Act" Principle: If a child discloses harm, or if you suspect a child is at risk of harm:

- **Listen carefully:** Allow the child to speak without interruption or leading questions. Do not promise confidentiality.
- **Believe the child:** Take the disclosure seriously.
- **Act promptly:** Follow the reporting procedures outlined below. Do not investigate the matter yourself.

Documentation: Record objectively what was said, observed, and the immediate actions taken. Use the P&C Confidential Record of Harm Allegation Template available in the resource's hub.

If the record is not readily available, you must take comprehensive notes, recording the following information:

- Date and time that record is made,
- The name, age and address of child or young person,
- Time, date and location of incident,
- The complainant (if not the child or young person),
- Who is present (i.e. the complainant, receiver of the complaint and any other person),
- Reason for suspecting abuse or harm (for example observation, injury, information),
- Exactly what the person disclosing said, using "I said..", "they said",
- The questions asked by the P&C volunteer or employee,
- Any comments the P&C volunteer or employee made, and

- The actions the P&C volunteer or employee took following disclosure, including arrangements for the immediate protection of the child or young person.

3.2. Reporting Procedures

The reporting procedures depend on the nature of the concern and who the concern is about.

A. Suspected Harm Involving anyone other than a Department Employee including P&C Association Member, Volunteer or Employee

If a P&C member, volunteer, or paid staff member suspects a child has been harmed, or is at risk of harm, by someone *other than a Department of Education Employee* (e.g., P&C Member, P&C Employee, another student, family member, unknown person), they must:

1. **Immediately notify the School Principal:** This is critical as the Principal is a mandatory reporter and has specific obligations under the **Education (General Provisions) Act 2006 (Qld)** and the **Child Protection Act 1999 (Qld)**.
 - Notification should occur as soon as practicable, ideally verbally, followed by written documentation report all suspicions that a student or child enrolled at a state school or attending a State Delivered Kindergarten has been harmed or is at risk of harm to the principal without unreasonable delay. (e.g., using the P&C Confidential Record of Harm Allegation Template in the Resource Hub).
 - The Principal must continue with this process and report all suspicions which meet the reporting threshold. The Principal will then manage the reporting process to external agencies (e.g., Queensland Police Service (QPS), Department of Child Safety, Seniors and Disability Services (Child Safety)) in accordance with the department's procedures.
2. **Notify the P&C Association Executive:** Inform the P&C President or another Executive member as soon as the Principal has been notified. This is for the P&C Executive to ensure support for the person making the report, while respecting confidentiality and for potential insurance implications.
3. **Do NOT investigate:** The P&C member/volunteer/staff should not conduct any personal investigation into the matter. This is the responsibility of the Principal and/or external authorities.

B. For P&Cs who operate OSHC Services (Delete if your P&C does NOT run an OSHC)

The National Quality Framework (NQF) provides a national approach to regulation, assessment and quality improvement for early childhood education and care and outside school hours care services across Australia. All OSCH services are expected to comply with relevant laws and regulations. The National Law and National Regulations outline the legal obligations of approved providers, nominated supervisors, and educators.

In September 2025, new regulatory amendments to the NQF were introduced including:

- new policy and procedures required for services around digital technologies
- notification timeframes for allegations or incidents of physical and sexual abuse reduced from 7 days to 24 hours

From 1 January 2026, refinements to the National Quality Standards (NQS) will commence to sharpen the focus on child safety and explicitly reference child safety within quality areas 2 and 7. Element 2.2.3 will become *Child Safety and Protection: Management, educators and staff are aware of their roles and responsibilities regarding child safety, including the need to identify and respond to every child at risk of abuse or neglect.*

C. Allegations of Harm Involving a Department of Education Paid Staff Member

If a concern, suspicion, or allegation of harm or risk of harm is made against a Department of Education paid staff member, the reporting process is different and must be followed strictly to ensure compliance with Department of Education procedures.

1. **Immediate Notification to the School Principal:** The person who receives the allegation or has the suspicion must immediately notify the School Principal. This must occur *before* notifying any P&C Executive members, unless the Principal is the subject of the allegation (in which case, P&Cs Qld and relevant authorities as per DoE guidelines should be consulted).
 - This initial notification to the Principal is crucial because the Principal has specific obligations under the Department of Education's **Allegations against employees in the area of student protection procedure.**
 - The Principal, in consultation with the department's Integrity and Employee Relations unit or other relevant DoE personnel, will determine the appropriate course of action, which may include reporting to the Queensland Police Service (QPS) and/or Child Safety, and managing the P&C individual's continued involvement in P&C activities.
2. **No Internal P&C Investigation:** The P&C Association itself must NOT investigate allegations of harm. Such investigations are the responsibility of QPS, Child Safety, or the Department of Education's Integrity and Employee Relations unit.
3. **Maintaining Confidentiality:** All information relating to allegations must be kept strictly confidential and only shared on a "need-to-know" basis with authorised persons.
4. **Support for Individuals:** The P&C Association will provide appropriate support to the child, their family, and the person making the report, while respecting the investigation process.

3.3. Complaints Handling (Other Concerns)

For complaints or concerns that do not involve suspected harm to a child (e.g., minor behavioural issues, non-compliance with P&C policies that do not pose a risk of harm), the P&C Association will follow its own internal complaints resolution process, ensuring it is transparent, timely, and fair. Any complaint that *could* indicate harm or risk of harm will be escalated to the procedures outlined in 3.2.

4. Training and Capacity Building (Standard 7)

The P&C Association is committed to providing ongoing education and training to ensure all members, volunteers, and paid staff have the knowledge and skills to promote child safety and wellbeing. This aligns with the Department of Education's emphasis on mandatory training for employees and visitors.

- **Mandatory Child Safeguarding Training:** All individuals undertaking regulated roles, or roles involving direct contact with children in P&C activities, must complete mandatory child safeguarding training provided by the P&C and the Principal.

- **P&C Child Safe Standards Training:** The P&C Association will encourage and facilitate access to ongoing awareness and learning related to child protection and child safeguarding best practices. P&Cs Qld has made available free of charge [Child Safe Standards training](#) that is available to all members.
- **Professional Development for P&C Employees:** The P&C Association will encourage and facilitate access to ongoing professional development related to child protection and child safeguarding best practices. Records of completed training for paid staff will be maintained by the P&C Executive.

5. Physical and Online Environments (Standard 8)

The P&C Association will ensure that all physical and online environments related to its activities promote safety and wellbeing and minimise opportunities for harm. The standards of behaviour fact sheet provide clear direction in relation to this.

- **Physical Environment:**
 - Risk assessments of physical spaces used for P&C activities (e.g., tuckshop, event venues) will be conducted, identifying and mitigating hazards.
 - Supervision plans will be developed for activities involving children to ensure adequate adult presence and visibility.
 - Clear procedures for emergency response, first aid, and incident management will be in place.
- **Online Environment:**
 - P&C members, volunteers, and staff should avoid direct, one-on-one electronic communication (e.g., text messages, private social media messages) with children unless explicitly approved by the school and parents/carers for specific, supervised program-related purposes. All official communication with children should occur through established school channels or P&C-approved group platforms with appropriate oversight.
 - Guidelines for P&C social media use will promote positive interactions, protect privacy, and avoid sharing identifiable images of children without explicit consent. Inappropriate content or conduct online will be addressed promptly.
 - Sensitive information about children will be stored securely and accessed only by authorised personnel.

6. Privacy and Information Sharing (Standard 4, 6)

The P&C Association is committed to protecting the privacy of children and their families, while also understanding its obligations to share information for child protection purposes.

- **Confidentiality:** All information relating to child protection concerns, complaints, or investigations will be handled with the utmost confidentiality. Information will only be shared on a "need-to-know" basis with authorised individuals and relevant external agencies as required by law.

- **Information Sharing for Child Protection:** Where there is a concern that a child may be at risk of harm, relevant information will be shared with the School Principal and, if necessary, with QPS or Child Safety, in accordance with legislative requirements (e.g., **Child Protection Act 1999 (Qld)**) and Department of Education procedures. This overrides general privacy considerations when a child's safety is at risk.
- **Record Keeping:** Accurate and secure records of child protection concerns, reports, and actions taken will be maintained. These records will be stored securely with access restricted to authorised individuals.

7. Communication and Engagement

Effective communication and engagement are crucial for fostering a child-safe culture within the P&C Association and the broader school community.

- **Dissemination of Strategy:** This Student Protection and Risk Management Strategy will be readily available to all P&C members, volunteers, and paid staff. It will be accessible via the P&C Association [e.g., website/shared drive/noticeboard] and included in induction materials.
- **Promoting Awareness:** The P&C Association will actively promote awareness of child safety and the Universal Principle/Child Safe Standards through various channels, including:
 - Adopting the Student Protection Risk Management Strategy at the AGM.
 - Displaying child-friendly posters about safety and how to speak up in P&C activity areas where appropriate. Inclusion of child safety information in P&C newsletters and communications to parents.
 - Working collaboratively with the school to align child safety messaging.
- **Feedback Mechanisms:** The P&C Association will provide accessible avenues for children, families, members, and volunteers to provide feedback on child safety practices. This feedback will be used to continuously improve the Strategy and associated procedures.
- **Engaging Children and Families (Standard 2, 3):** Where appropriate, and in collaboration with the school, the P&C Association will seek opportunities to:
 - Inform children about their rights to safety and participation.
 - Involve children in decisions that affect their safety in P&C activities.
 - Involve families in discussions about child safety within P&C contexts.

8. Review and Evaluation (Standard 9)

The P&C Association is committed to the continuous improvement of its child safeguarding practices. This Strategy will be regularly reviewed and evaluated to ensure its effectiveness, currency, and alignment with best practices, legislative changes, and Department of Education requirements.

- **Review:** This Strategy will be formally reviewed annually by the P&C Executive prior to the Annual General Meeting (AGM). The review will consider:
 - Effectiveness of existing control measures.
 - Any legislative or policy changes (e.g., **QFCC guidelines, DoE policies**).

- Feedback received from children, families, members, and school staff.
- Incident reports and outcomes.
- Effectiveness of training programs.
- **Ad-hoc Reviews:** The Strategy may be reviewed and updated at any time if significant changes occur (e.g., new P&C activities, new legislation, significant incidents).
- **Reporting:** The Annual checklist needs to be completed and presented with the updated Student Protection Risk Management Strategy for adoption at the P&C Association's AGM. A copy of this checklist is to be provided to the Principal.
- **QFCC Reporting:** The P&C Association will cooperate with any reporting or assurance requirements from the QFCC as the regulator of the **Child Safe Organisations Act 2024**.

Document Control

Effective Date: 17 March 2026

Review Date: 16 March 2027

Version: 1.0

Resources Hub

- Blue Card Register
- Volunteer Register with Standards of Behaviour Fact sheet
- P&C Code of Conduct (found at back of the P&C Model Constitution)
- Confidential Record of Child Harm Allegation Form

Links to Other Organisations

[QFCC Child Safe Organisations](#) - Provides guidelines and information on implementing the Universal Principle and Child Safe Standards in Queensland.

Blue Card Services (Queensland Government): [Blue Card Services | Your rights, crime and the law - Queensland Government](#)

Department of Education procedures and documents:

Child and Student Protection Policy: [Child and student protection policy](#)

Student Protection Procedure: [Student protection procedure](#)

Allegations against employees in the area of student protection procedure: [Allegations against employees in the area of student protection procedure](#)

Working with children authority procedure: [Child and Youth Risk Management Strategy \(CYRMS\)](#)

Legislation

Child Safe Organisations Act 2024 (Qld): This is the primary Act underpinning the new child safe organisations system in Queensland, establishing the framework for implementing the Universal Principle and Child Safe Standards.

Working with Children (Risk Management and Screening) Act 2000 (Qld): This Act governs the Blue Card system, setting out requirements for screening people who work or volunteer with children to prevent child abuse.

Working with Children (Risk Management and Screening) Regulation 2020 (Qld): This Regulation provides specific details and operational aspects for the implementation of the Working with Children Act.

Child Protection Act 1999 (Qld): This Act outlines the framework for child protection in Queensland, including mandatory reporting obligations for suspected harm or risk of harm to children.

Education (General Provisions) Act 2006 (Qld): This Act contains provisions related to the administration of state education, including responsibilities concerning student safety within educational settings.

Criminal Code Act 1899 (Qld) (Criminal Code): This Act defines criminal offences, including those related to child abuse and exploitation, which are relevant when responding to allegations of harm.

Appendix A: Compliance Summary

Standard / Principle	QFCC Expectation	Strategy Alignment
Universal Principle: Cultural Safety	Embed cultural safety for Aboriginal and Torres Strait Islander children in all aspects of operations.	Explicit commitment to cultural safety; includes consultation, training, and cultural indicators.
Standard 1: Leadership, Governance & Culture	Child safety is embedded in leadership and governance.	Strategy endorsed annually at AGM; leadership roles clearly defined.
Standard 2: Children's Rights & Participation	Children are informed, participate in decisions, and are taken seriously.	Children's rights are acknowledged; input is sought in relevant activities.
Standard 3: Family & Community Engagement	Families and communities are involved in promoting child safety.	Strategy includes communication plans and collaborative engagement.
Standard 4: Equity & Inclusion	Diverse needs are respected, and equity is promoted.	Strategy addresses inclusion for children with disabilities and diverse backgrounds.
Standard 5: Suitability of Personnel	People working with children are suitable and supported.	Blue Card screening, induction, and training are mandatory and documented.
Standard 6: Complaints & Concerns	Accessible, child-focused complaints processes.	Clear procedures for reporting harm; trauma-informed and culturally responsive.

Standard 7: Knowledge & Skills	Staff and volunteers are trained and supported.	Mandatory training and professional development are required and tracked.
Standard 8: Risk Management	Risks in physical and online environments are identified and managed.	Risk Management Plans are required for all activities; online safety protocols included.
Standard 9: Safe Environments	Physical environments are safe and regularly reviewed.	Safety checks and supervision plans are part of the strategy.
Standard 10: Continuous Improvement	Systems are regularly reviewed and improved.	Annual review process and feedback mechanisms are embedded.

Appendix B: Student Protection Risk Management Annual Checklist

Townsville State High School P&C Association 2026 Student Protection Risk Management Annual Checklist

Currency of Blue Cards	
1. Volunteers / P&C employees are entered into the P&C's Blue Card Register (including those who are exempt from requiring a Blue Card, e.g. a parent of a child currently attending the school or a volunteer under the age of 18) and Organisation Portal.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
2. All Blue Cards are valid and current.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
3. Any volunteers / P&C employees without a valid Blue Card are not currently working/volunteering, and have been prompted to complete new applications online - No Card. No Link. No Start.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
4. Any persons with a negative or suspended notice are not currently employed.	<input type="checkbox"/> Yes / <input type="checkbox"/> No

Risk Management

1. Annual review of strategy has been completed.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
2. Training is accessible to volunteers and P&C employees.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
3. Activities for the year have been evaluated for risks to students.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
4. Updated Risk Management Policy is approved at the P&C AGM.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
5. This Student Protection Risk Management Strategy and any other related information is easily accessible to all volunteers and P&C employees.	<input type="checkbox"/> Yes / <input type="checkbox"/> No

*** This checklist needs to be completed and presented with the updated Student Protection Risk Management Strategy for adoption at the P&C Association's AGM. A copy of this checklist is to be provided to the Principal.**

P&C President's Signature: _____ Date: _____

Townsville State High School Parents & Citizens Association

Student Protection Activity Risk Management Plan

The Activity Risk Management Plan records details of all the risks identified for the life of the activity, their grading in terms of likelihood of occurring and seriousness of impact on the activity, initial plans for mitigating each high-level risk and subsequent results.

ACTIVITY:				
Category of Harm	Risks - What could go wrong? Consider the nature of the activity, the environment/location of the activity, the stakeholders involved, risks of harm to children and young people associated with the activity, and the likelihood and consequences of the identified risks.	Level of Risk L/M/H*	Risk control measures Actions taken to prevent harm, limit damage, reduce liability.	Evaluation of controls Satisfactory/unsatisfactory
Harm caused by school or P&C employee.				
Harm caused by another student.				
Harm caused by a person not employed by Education Qld or P&C Assoc. E.g.: Volunteers				
Self-harm				

*L = Low, M = Middle, H = High.

PROCESS FOR RESPONDING TO A DISCLOSURE OF HARM TO A CHILD

RECEIVING A DISCLOSURE

- Remain calm and find a private place to talk
- Explain why you can't keep it a secret
- Only ask enough questions to confirm the need to report the matter
- Do not attempt to conduct your own investigation

DOCUMENTING A DISCLOSURE

Complete a Confidential Record of Child Harm Allegation and include:

- Time, date and place of the disclosure
- Record "word for word" what happened and what was said, including anything you said and any actions that have been taken
- Date of report and signature

REPORTING A DISCLOSURE

A P&C volunteer or employee who receives a disclosure is to report it to:

- Qld Police Service and the Principal*

OSHC employees who receive a disclosure are to report it to:

- Qld Police Service, the Principal* and the OSHC Coordinator who will complete the appropriate documentation in accordance with OSHC Policies and Procedures for the licensee (P&C President or Vice President (OSHC) to report to the Department of Families, Seniors, Disability Services and Child Safety)

** If you suspect the Principal is responsible for causing harm to a student, report this to the Qld Police Service and the Regional Director at the local Regional Office of the Department of Education.*

FOLLOWING A DISCLOSURE

Support and counselling will be offered to all parties involved.

Where a P&C volunteer or employee is alleged to have committed harm to a child, their roles and duties MUST be reviewed by the P&C.

The Student Protection Risk Management Strategy, particularly the procedures for handling disclosures or suspicions of harm, must also be reviewed.