

Reporting on the Implementation of Recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse (Rec 17.3)

Section 1: Identifying the institution

- Name: Brisbane Grammar School
- Location: 24 Gregory Terrace, Spring Hill QLD 4000
- Specific organisational category: Non-government school

Section 2: General reporting against recommendations relevant to all institutions

Theme 1: Making institutions child safe

Measure 1.1:

Implementation of the National Principles for Child Safe Organisations / Child Safe Standards (or jurisdictional equivalent). This includes actions such as:

- developing or revising a Code of Conduct and ensuring staff and volunteer compliance,
- implementing and updating child safe policies and procedures,
- maintaining training for staff and volunteers on their child safety obligations and behavioural expectations, and
- maintaining risk management strategies for a child safe institution

Report Volume:

Volume 6 and Volume 7.

Recommendation(s) the measure is in response to:

Recommendations 6.4 – 6.6, 7.8.

Description of measures implemented prior to December 2020 and prospective work that will be undertaken post-2020 to implement this measure:

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
6.4	<p>All institutions should uphold the rights of the child. Consistent with Article 3 of the United Nations Convention on the Rights of the Child, all institutions should act with the best interests of the child as a primary consideration. In order to achieve this, institutions should implement the Child Safe Standards identified by the Royal Commission.</p>	<p>See specific responses below in relation to the implementation of the Child Safe Standards.</p>	<p>The Australian Childhood Foundation has been engaged to perform an external audit of the School's adoption of the standards recommended by the Royal Commission.</p>
6.5	<p>The Child Safe Standards are:</p> <ol style="list-style-type: none"> 1. Child safety is embedded in institutional leadership, governance and culture 2. Children participate in decisions affecting them and are taken seriously 3. Families and communities are informed and involved 4. Equity is upheld and diverse needs are taken into account 5. People working with children are suitable and supported 6. Processes to respond to complaints of child sexual abuse are child focused 7. Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training 	<p>See specific responses below in relation to the implementation of the Child Safe Standards.</p>	<p>Post 2020, the Child Safe Standards will continue to be the focus of the School's child protection strategy.</p>

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	8. Physical and online environments minimise the opportunity for abuse to occur 9. Implementation of the Child Safe Standards is continuously reviewed and improved 10. Policies and procedures document how the institution is child safe.		
6.6	Institutions should be guided by the following core components when implementing the Child Safe Standards:	See specific responses below in relation to the implementation of the Child Safe Standards.	
	Standard 1: Child safety is embedded in institutional leadership, governance and culture a. The institution publicly commits to child safety and leaders champion a child safe culture. b. Child safety is a shared responsibility at all levels of the institution. c. Risk management strategies focus on preventing, identifying and mitigating risks to children. d. Staff and volunteers comply with a code of conduct that sets clear behavioural standards towards children.	The School has implemented Child Safe Standard 1 as follows: <ul style="list-style-type: none"> • (Standard 1(a)) BGS has developed a detailed <i>Child Protection Policy and Child Risk Management Strategy (Child Protection Policy)</i> as well as a suite of 'Creating a Safe School Environment' brochures (Safe School Brochures) which can be accessed by the public via the School's website. Each document records the School's commitment to the safety and wellbeing of all students in its care (see, e.g., Child Protection Policy section 3 'Statement of Commitment'). BGS has a Child Protection Committee comprising leaders of the School and representatives of stakeholder groups (including parents, external experts and students). The Committee broadly covers all School operations and has clearly defined terms of reference. On a monthly basis, Management provides updates regarding any matters of child protection that have been reported to the relevant authorities. 	The School is currently working towards achieving Safeguarding Children Accreditation with the Australian Childhood Foundation. As part of this process, the School is reviewing and amending its policies, procedures and systems to ensure that they meet or exceed the minimum accreditation requirements. Accreditation is contingent upon the School's implementation of the Child Safe Standards. BGS continues to operate a professional development

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	<p>e. Staff and volunteers understand their obligations on information sharing and recordkeeping.</p>	<ul style="list-style-type: none"> • (Standard 1(b)) The Child Protection Policy recognises that child safety is a shared responsibility at all levels of the institution by imposing responsibilities on: <ul style="list-style-type: none"> - The Board of Trustees; - The Headmaster; - Deputy Headmasters; - The Head of Middle School; - Other staff (including all employees, consultants, contractors, people undertaking work experience or vocational placements, and volunteers); - Parents; and - Students (see section 1). • (Standard 1(c)) The Child Protection Policy contains a <i>Child Risk Management Strategy</i> which focuses on minimising and eliminating risks to child safety (Annexure E). In addition, the School has developed a Student Wellbeing Strategic Plan which identifies the strategic imperatives for the School for student wellbeing and assigns and prioritises the operational actions required to achieve those. The School also has a formal Student Wellbeing Framework, including a dedicated Student Wellbeing Team, which is responsible for implementing the Student Wellbeing Strategic Plan. Further, in 2016, the School engaged Professor Steven Smallbone (a child safety expert and emeritus professor of criminology at Griffith University) to conduct a Child Protection Audit of the School. Professor Smallbone made a number of recommendations, including in relation to the School's change room rules, all of which were adopted by the School (culminating in the development of the <i>Change Room Supervision Procedures for Staff</i>). The School also 	<p>process for all volunteers and staff members, as well as continuing to implement a communication strategy to the community and updating policy documents on a yearly basis. For example, maintaining line of sight in School facilities, and articulating procedures to report issues of concern.</p>

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		<p>reviewed its policies and procedures against Professor Smallbone’s report to the Royal Commission. The School has also conducted an internal audit of its compliance with the Child Safe Standards. The outcomes of this audit have formed the work of the School’s Child Protection Committee and are in the process of being validated by the Australian Childhood Foundation.</p> <ul style="list-style-type: none"> • (Standard 1(d)) BGS maintains a <i>Staff Code of Conduct (Staff Code)</i> which applies to all staff (including employees, consultants, contractors, people undertaking work experience or vocational placements, and volunteers). Amongst other things, the Staff Code: <ul style="list-style-type: none"> - Contains various provisions outlining unacceptable conduct, including with respect to interactions with students (section 1.1), sexual misconduct (section 1.6) and conduct in a private capacity (section 1.11); - Requires staff members who have a reasonable concern that another staff member has or intends to breach the Staff Code to discuss the matter with their supervisor or another appropriate senior staff member (Introduction section); and - Requires staff members to comply with the School’s Child Protection Policy (section 1.5), which in turn contains detailed processes for reporting of particular matters both internally and to external authorities. • (Standard 1(e)) The Child Protection Policy (which applies to all staff including volunteers) contains specific provisions on confidentiality and record keeping (section 4.3) as well as provisions dealing with recording allegations and actions in 	

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		relation to suspected harm or inappropriate behaviour (see, e.g., section 7, 7.4, Annexure A, Annexure B, Annexure C).	
	<p>Standard 2: Children Participate in decisions affecting them and are taken seriously</p> <p>a. Children are able to express their views and are provided opportunities to participate in decisions that affect their lives.</p> <p>b. The importance of friendships is recognised and support from peers is encouraged, helping children feel safe and be less isolated.</p> <p>c. Children can access sexual abuse prevention programs and information.</p> <p>d. Staff and volunteers are attuned to signs of harm and facilitate child-friendly ways for children to communicate and raise their concerns.</p>	<p>The School has implemented Child Safe Standard 2 as follows:</p> <ul style="list-style-type: none"> • (Standard 2(a)) The Child Protection Policy provides that the School respects and promotes the rights of students to participate in decision making (section 4.1). In addition, the School has established a Child Protection Committee to oversee the School’s implementation of and compliance with best practice regarding child safety (section 3, 4). The membership of that committee relevantly includes students, allowing students to participate in the decision-making process. Further, the School conducts an annual in-house student wellbeing audit, in the form of a survey of all students, to inform the development of its Student Wellbeing Strategic Plan, Framework and Program. Senior students (known as ‘Form Seniors’) also assist Form Tutors (see comments regarding Standard 4 below) by helping to deliver aspects of the School’s Student Wellbeing Program, and mentor and guide students in younger grades. During the Senior year, every student is afforded an audience with the Headmaster, and the Deputy Headmaster-Students, to share information about what needs to be considered to provide a better service for students at the School. ‘Student Voice’ is a recurring theme in assembly address and students are encouraged through committees such as the Student Representative Body to interact with staff and Management in the decision making process. The School has adopted a theme “Tell Someone You Trust” as a way of communicating to students the importance of reporting any issues. 	<p>In 2021, the School intends to alter the Committee structure for students so that the structure is vertical rather than horizontal. This will allow boys from a variety of year groups to be part of committees as part of the Public Purpose Program.</p>

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		<ul style="list-style-type: none"> • (Standard 2(b)) The School has 13 specific student wellbeing aims and objectives, published in the Staff Handbook and Middle School Parent Handbook, one of which is to “provide contact and understanding among students beyond their own Year-group” (the objective of which is to “provide opportunities for students to interact with other students from different Year-groups”). Year 12 students, called Form Seniors, are part of tutor groups for Years 5 to 9. This allows students to have access to older students in the School as mentors on an at least twice per week basis. There are also Year 11 outdoor education leaders who accompany boys Years 5 to 9 to their outdoor education experience each year. • (Standard 2(c)) The School provides education on child protection matters to all students as part its student wellbeing curriculum, and informs students of confidential external agencies which may be able to assist them in processing any concerns they may have and steps to report them, such as ‘Kids Helpline’ (see Child Protection Policy section 7.3). In addition, the School publishes a suite of ‘<i>Creating a Safe School Environment</i>’ brochures (Child Safety Brochures) aimed at day students and boarding students and their parents/guardians, which contain general information about child safety issues and how to report concerns. • (Standard 2(d)) The Child Protection Policy, which applies to all staff (including volunteers), details indicators of harm (including sexual abuse) (section 6). BGS educates staff and volunteers to be ‘eyes and ears’ of the institution to safeguard children. 	

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	<p>Standard 3: Families and communities are informed and involved</p> <ol style="list-style-type: none"> a. Families have the primary responsibility for the upbringing and development of their child and participate in decisions affecting their child. b. The institution engages in open, two-way communication with families and communities about its child safety approach and relevant information is accessible. c. Families and communities have a say in the institution's policies and practices. d. Families and communities are informed about the institution's operations and governance. 	<p>The School is has implemented Child Safe Standard 3 as follows:</p> <ul style="list-style-type: none"> • (Standard 3(a)) The School has a Parents and Friends' Association (PF Association), of which all parents are members. The PF Association encourages appropriate parental and community involvement at the School and aims to contribute to the educational experiences of students by providing voluntary services and raising funds to support school activities, resources and projects. The School believes that its partnership with families is an ingredient for success with the boys, and families are therefore encouraged to be actively engaged in all aspects of school life. As part of the wellbeing portfolio, the School provides up to ten opportunities for parents to engage with experts to assist them to understand their son's schooling and School life. • (Standard 3(b)) The Child Protection Policy and Child Safety Brochures are available to parents on the School's website and via its intranet. In addition, the School has 13 specific student wellbeing aims and objectives, published in the Staff Handbook and Middle School Parent Handbook, one of which is to "establish and maintain regular and easy two-way lines of communication between class and Form tutors". The School's Staff Code of Conduct also sets clear expectations of teachers for parent/guardian communication. Further, the School regularly reports on child safety matters in the School's newsletter and at assemblies, including in relation to particular incidents (where appropriate) and the work of the Royal Commission. • (Standard 3(c)) The School has established a Child Protection Committee (comprised of School management, 	<p>The School's goal remains the professional development of all key stakeholders, continued collaboration with the Australian Childhood Foundation as set out above, and the maintenance of a culture of open communication between all members of the School community.</p>

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		<p>teaching staff, support staff, students, parents and external experts) to oversee the implementation of and compliance with best practice regarding child safety, in consultation with the School's Senior Leadership Team (section 3, 4.15). The School has a well-established data collection process for parents, staff and students, all of which inform School policy and practices.</p> <ul style="list-style-type: none"> • (Standard 3(d)) Parents are provided with the Middle School Handbook and/or Boarder and House Tutor Handbook as appropriate. These documents provide detailed guidance regarding the School's day and boarding operations. The School also holds regular information evenings for parents on various topics. Further, the School parent portal (MyGrammar) contains comprehensive information to keep parents informed of relevant operational aspects of the School and its governance protocols. 	
	<p>Standard 4: Equity is upheld and diverse needs are taken into account</p> <ol style="list-style-type: none"> The institution actively anticipates children's diverse circumstances and responds effectively to those with additional vulnerabilities. All children have access to information, support and complaints processes. The institution pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with disability, and children from 	<p>The School has implemented Child Safe Standard 4 as follows:</p> <ul style="list-style-type: none"> • (Standard 4(a)) The Child Protection Policy records the School's commitment to equity and diversity, noting the particular needs of students who are Aboriginal or Torres Strait Islander, have a disability, are from culturally or linguistically diverse backgrounds, identify as LGBTI, or are unable to live at home. The School is required to uphold this commitment (section 4.1). • (Standard 4(b)) All students have access to the Child Protection Policy. In particular, students are each provided with detailed guidance regarding every aspect of the School, with information and links to relevant policies and procedures including the Child Protection Policy (via MyGrammar). The School also publishes Child Safety 	<p>The School has also engaged an external auditor of its bullying programs. Recommendations from that audit will be implemented in 2021.</p> <p>The School continues to roll out the online Child Protection Course of the Australian Childhood Foundation which is built around the Child Safe Standards. This online course is completed by all staff, volunteers and the Board of Trustees.</p>

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	culturally and linguistically diverse backgrounds.	<p>Brochures aimed at day students and boarding students. Those publications contain information on child safety matters, including how to make a report and available support. In addition, the School has an online 'Bullying Register' for students to report issues or concerns about themselves or others, as well as an online system called 'Student Voice' for reporting of other concerns. Students are also supported by teachers, through their role as Form Tutors (referred to as Core Teachers in the Middle School), who are directly involved in the weekly delivery of the School's Student Wellbeing Program. The student wellbeing role of a teacher is to, amongst other things:</p> <ul style="list-style-type: none"> - Act as a concerned 'parent' or 'mentor' for students, in the sense of "someone who attends the student's total involvement, learning and development within the School, and who is available to act as a facilitator in communication between the various teachers who are contributing to the student's programme of learning and who also may translate between the student's school and home lives (see the School's Staff Handbook) (in recent years, the connection between staff and students has focussed on creating a tiered approach with a longitudinal profile, meaning there are multiple staff who are connected to each student over an extended period of time); - Implement the School's Student Wellbeing Curriculum, which covers topics such as relationships, health issues, future planning and protective behaviours. <p>The School also provides support to students through its Head of Year system, which operates from Years 5 through</p>	

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		<p>to 12. Heads of Year move upward through the School with a particular year group, providing pastoral continuity for that group. The Heads of Year are supported by Assistant Heads of Year, who work collaboratively with Heads of Year, Form Tutors, parents and students within a particular year group.</p> <ul style="list-style-type: none"> • (Standard 4(c)) See comments in respect of 4(a) above. In addition, the School has a dedicated Indigenous Student Liaison Officer, who works with each indigenous student in the School and with the School's Closing the Gap Committee. Our partnership with Cape York Leaders Program also provides a connection with indigenous liaison officers from that Program. 	
	<p>Standard 5: People working with children are suitable and supported</p> <ol style="list-style-type: none"> Recruitment, including advertising and screening, emphasises child safety. Relevant staff and volunteers have Working With Children Checks. All staff and volunteers receive an appropriate induction and are aware of their child safety responsibilities, including reporting obligations. Supervision and people management have a child safety focus. 	<p>The School has implemented Child Safe Standard 5 as follows:</p> <ul style="list-style-type: none"> • (Standard 5(a)) The School has developed a <i>Recruitment and Selection Policy (Recruitment Policy)</i> which requires the School to, amongst other things, ensure that: <ul style="list-style-type: none"> - Job advertisements, application forms and/or selection criteria/duty statements: contain a clear condition that applicants and staff meet the School's requirements for child safety in accordance with the Child Protection Policy; specify whether teacher registration or a Blue Card is necessary for the successful candidate; and specify the School's requirements for referee and identify checks and for disclosure by a candidate of any information relevant to the candidate's eligibility or suitability to engage in activities involving children (section 4); 	

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		<ul style="list-style-type: none"> - Candidates applying for advertised positions at the School are provided with a copy of the Recruitment Policy and Child Protection Policy (section 4); - The interview process includes at least one face to face interview (section 5); - During interviews, candidates will be asked questions to test their values and attitudes concerning relationships with children, and their understanding of sexual (and other) abuse, its causes and prevention (section 5); and - Screening and due diligence processes are undertaken in respect of candidates, including obtaining references and assessing working with children matters (section 6.1). <p>To support these measures, the School has also developed:</p> <ul style="list-style-type: none"> - Job application forms which require at least two referees including (where applicable) the applicant's direct report in their last role, and the Headmaster for their last role; - A template job advertisement which includes clear statements about the School's commitment to child safety; - Position criteria which address child safety considerations; - A standard interview guide which prompts interviewers to provide information about the School's child protection policies and ask child safety related questions. <ul style="list-style-type: none"> • (Standard 5(b)) The Child Protection Policy requires the School to require relevant prospective or current staff and Board members to apply for a Blue Card or Exemption Notice, and check the validity and appropriateness of any 	

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		<p>currently held notices as appropriate (Annexure E, section 3(f)). The Deputy Headmaster – Staff conducts online registration status checks of applicants for teaching positions. Applicants who are not registered or do not have pending registrations are not shortlisted for the position. The School has an electronic spreadsheet to track the currency of Blue Cards required for non-teaching staff and this is checked at least once a month. Where a Blue Card is to expire within three months, an email is sent to the relevant staff member and their supervisor reminding them that they must reapply. Checks are then carried out to ensure the staff member has done so.</p> <ul style="list-style-type: none"> • (Standard 5(c)) Under the Child Protection Policy, the School implements an induction program which thoroughly addresses the School's policies and procedures, particularly its expectations regarding child risk management (Annexure E, section 3(b)). Staff are also provided with a <i>Staff Information Handbook</i> and, where applicable, a <i>Middle School Teachers' Handbook</i>, each of which contain detailed guidelines to assist staff in performing their duties (including addressing child protection matters). The School has implemented the Australian Childhood Foundation's online training course (see comments for Standard 4 above). The School has procedures for reporting harm for staff members, which provide further guidance on their reporting obligations. • (Standard 5(d)) Under the Child Protection Policy, the School implements training and management procedures to reduce the risk of harm to children from staff, including (but not limited to): 	

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		<ul style="list-style-type: none"> - Management processes that are consistent, fair and supportive, and provide an appropriate level of supervision; - Ensuring duty statements and performance objectives address child safety as a stand-alone criteria; - Training new and existing staff on an ongoing basis at least annually about the School’s policies and procedures, identifying, assessing and minimising risks to children, and handling a disclosure or suspicion of harm to a child; - Using exit interviews as a means to assist the School to identify any issues of concern that may impact on the safety or wellbeing of students of the School (Annexure E, section 3(b)). <p>The School has in recent years also increased supervision of students during School hours, including by increasing staff numbers, changing areas for supervision and restricting access. For example:</p> <ul style="list-style-type: none"> - The School requires that teachers mark an electronic roll at the commencement of every teaching period. If this reveals that any student has been absent for two or more periods, it is reported to the School Marshal; and - Line of sight and supervision have formed a core component of design process for more recently constructed or refurbished buildings on the School campus. <p>In addition, the School has implemented staff supervision structures to provide clear reporting lines and accountability of all staff. This includes duty statements, performance objectives and a formal appraisal interview each year.</p>	

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	<p>Standard 6: Processes to respond to complaints of child sexual abuse are child focused</p> <p>a. The institution has a child-focused complaint handling system that is understood by children, staff, volunteers and families.</p> <p>b. The institution has an effective complaint handling policy and procedure which clearly outline roles and responsibilities, approaches to dealing with different types of complaints and obligations to act and report.</p> <p>c. Complaints are taken seriously, responded to promptly and thoroughly, and reporting, privacy and employment law obligations are met.</p>	<p>The School has implemented Child Safe Standard 6 as follows:</p> <ul style="list-style-type: none"> • (Standard 6(a)) The Child Protection Policy details child safety reporting obligations (see in particular, Annexures A, B and C) and applies to all students, staff (including volunteers) and parents/guardians. The School has a Student Wellbeing Program (a curriculum designed to promote the social, ethical, physical, intellectual and emotional development of students) which, amongst other things, includes at least one lesson per year on the Child Protection Policy, where the definition of 'harm' is discussed, reporting lines are highlighted, and students are encouraged to report any act of bullying or other form of harm. In addition, the School has published (and makes available to students) Child Safety Brochures aimed at providing accessible, easy-to-read information about child safety matters to day and boarding students. • (Standard 6(b)) The Child Protection Policy details child safety reporting obligations, with different procedures for reporting 'harm', 'sexual abuse' and 'inappropriate behaviour' in accordance with applicable Queensland child safety legislation (see in particular Annexures A, B and C). The School has procedures for reporting harm for staff members, which provide further guidance on their reporting obligations. • (Standard 6(c)) The Child Protection Policy contains detailed provisions for responding to complaints (see Annexures A, B and C). The Child Protection Policy also contains provisions directed toward ensuring compliance with: 	<p>Any recommendations in relation to responding to complaints arising from the external audit performed by the Australian Childhood Foundation (see comments at 6.4 above) will be implemented.</p>

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		<ul style="list-style-type: none"> - Reporting obligations (see comments above and Annexures A, B and C); - Privacy obligations (section 4.3) (the School also maintains a <i>Privacy Policy and Standard Information Collection Notice</i>); and - Employment obligations, particularly in relation to the taking of disciplinary action against staff and ensuring procedural fairness (section 4.1, 4.2, 4.13, 7). 	
	<p>Standard 7: Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training</p> <ol style="list-style-type: none"> a. Relevant staff and volunteers receive training on the nature and indicators of child maltreatment, particularly institutional child sexual abuse. b. Staff and volunteers receive training on the institution's child safe practices and child protection. c. Relevant staff and volunteers are supported to develop practical skills in protecting children and responding to disclosures. 	<p>The School has implemented Child Safe Standard 7 as follows:</p> <ul style="list-style-type: none"> • (Standard 7(a)) All staff (including volunteers) receive training on the School's policies, including the Child Protection Policy. Such training begins with the induction process. Staff members who commence during the course of the academic year take part in a half day induction program designed to familiarise them with the School's processes and procedures, and to outline the School's expectations, including compliance with the Child Protection Policy. A two-day induction program for all new staff is then held at the start of each academic year. All new staff members from the previous year are required to attend this full two-day induction program. Professional development then continues through each staff member's engagement (including participation in a week long professional learning program which includes training on the Child Protection Policy). By way of example: <ul style="list-style-type: none"> - Staff are required to complete and pass an online quiz designed to test their knowledge of the Child Protection Policy; - The School's solicitors have conducted workshops with staff about responsibilities for child protection; 	<p>Recommendations from the Australian Childhood Foundation regarding the School's education program will be implemented. The School's approach in this regard is perennial.</p>

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		<ul style="list-style-type: none"> - A series of experts have presented on several occasions to staff and volunteers on the topic of child protection; - All staff and volunteers are required to complete the online education modules developed by the Australian Childhood Foundation; - The School provides internal updates and professional development for its staff in relation to child protection; - The School's staff have used scenario data from the Royal Commission to help them understand their role in the management of child protection in the School; - The School has developed a framework based on the Child Safe Standards; - Members of the School's Student Wellbeing Team regularly attend external professional development on student wellbeing, including child protection (conducted by organisations such as International Boys' School Coalition, Independent Schools Queensland, Australia & New Zealand Education Law Association, and Positive Schools Australia); - The School keeps records of all staff professional development on an electronic database (Synergetic) and this is also reported by the Senior Leadership Team to the Board of Trustees; - The School has delivered presentations on multiple occasions to staff and volunteers regarding the recommendations of the Royal Commission including the implementation of the Child Safe Standards; - The School is currently focussed on arranging training by all staff from an appropriately qualified expert (e.g. 	

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		<p>psychologist) to aid understanding of sexual abuse, how it occurs and its prevention.</p> <ul style="list-style-type: none"> • (Standard 7(b)) Refer to comments for Standard 7(a) above. • (Standard 7(c)) Refer to comments for Standard 7(a) above. 	
	<p>Standard 8: Physical and online environments minimise the opportunity for abuse to occur</p> <p>a. Risks in the online and physical environments are identified and mitigated without compromising a child's right to privacy and healthy development.</p> <p>b. The online environment is used in accordance with the institution's code of conduct and relevant policies.</p>	<p>The School has implemented Child Safe Standard 8 as follows:</p> <ul style="list-style-type: none"> • (Standard 8(a)) The Staff Code (which applies to all staff): <ul style="list-style-type: none"> - Prohibits staff from using online social networks to contact or interact with students, unless the contact or interaction is sanctioned by the School as part of a School activity (section 2.6); - Requires staff members who want to use social media for educational purposes to first obtain the written approval of a member of the Senior Leadership Team and once approved, work with the School's administrative and technology staff to identify and use restricted, School-endorsed networking platforms (section 2.6). <p>Further, as part of the Student Wellbeing Curriculum, the School has a scoped and sequenced program based on managing cyber space for students in Years 5 to 12. The School also provides opportunities for guest speakers to present to student and parents on this topic;</p> <ul style="list-style-type: none"> • (Standard 8(b)) The Staff Code requires staff members to comply with the School's <i>Computer Network and Internet Services – Acceptable Use Policy for Staff</i> (section 2.6). The School also maintains a <i>Social Media Policy</i> and <i>Explicit Sexual Material Policy</i>. 	<p>The School is introducing in 2021, eSafe, an online monitoring program which tracks student and staff internet usage while connected to the School's network.</p>
	<p>Standard 9: Implementation of the Child Safe Standards is continuously reviewed and improved</p>	<p>The School is guided by and implements Child Safe Standard 9 as follows:</p> <ul style="list-style-type: none"> • (Standard 9(a)) The School reviews the Child Protection Policy at least annually (section 4.16, 5). The School's 	

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
	<p>a. The institution regularly reviews and improves child safe practices.</p> <p>b. The institution analyses complaints to identify causes and systemic failures to inform continuous improvement.</p>	<p>policies (including updates thereto) are informed by input from internal and independent examinations of the School's child protection practices and policies;</p> <ul style="list-style-type: none"> • (Standard 9(b)) The School has two dedicated complaints policies – the <i>Complaints Policy (Staff)</i> and the <i>Complaints Policy (Parents and Students)</i>. Both policies: <ul style="list-style-type: none"> - Include an express commitment by the School to deal with complaints in a way that promotes a culture of continuous improvement and collaboration (section 1 of both policies); and - Require the School to note the outcome of complaints with a view to promoting a culture of continuous improvement and better outcomes for members of the School community (section 3 of both policies). 	
	<p>Standard 10: Policies and procedures document how the institution is child safe</p> <p>a. Policies and procedures address all Child Safe Standards.</p> <p>b. Policies and procedures are accessible and easy to understand.</p> <p>c. Best practice models and stakeholder consultation inform the development of policies and procedures.</p> <p>d. Leaders champion and model compliance with policies and procedures.</p>	<p>The School has implemented Child Safe Standard 10 as follows:</p> <ul style="list-style-type: none"> • (Standard 10(a)) The Child Protection Policy and other policies and procedures address the Child Safe Standards (see comments above). • (Standard 10(b)) School policies and procedures about child safety are publicly available via the School's website and/or on the School's intranet. The School has made substantial efforts to ensure that such policies and procedures (and in particular, legislative harm reporting obligations) are comprehensive but easy to understand and apply. By way of example, the Child Protection Policy contains detailed, guided processes for reporting depending on the type of harm or conduct suspected (see Annexures A, B and C). Further, the School has developed procedures comprising a flowchart summarising the relevant reporting obligations for use by staff. 	<p>The School's leadership will continue to actively promote a culture of belonging and connectedness.</p>

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
	e. Staff understand and implement the policies and procedures.	<ul style="list-style-type: none"> • (Standard 10(c)) The Child Protection Policy is reviewed and updated in accordance with best practice of the day and to comply with applicable legislation (section 1). In addition, the School has established a Child Protection Committee (comprised of teaching staff, support staff, students and parents) to oversee the implementation of and compliance with best practice regarding child safety, in consultation with the School's Senior Leadership Team (section 3, 4.15). • (Standard 10(d)) The School's leadership continually promotes a culture of belonging and connectedness; • (Standard 10(e)) All staff are expected to understand and comply with School policies and procedures. Failure to comply with reporting obligations in Child Protection Policy amounts to serious misconduct and will lead to disciplinary action which may include dismissal (section 7). Failure to comply with the Child Protection Policy generally will also attract such action, and will constitute a breach of the staff member's employment agreement (where they are an employee of the School). Staff receive mandatory training on the Child Protection Policy which includes completion of assessment (in the form of a quiz). 	
7.8	<p>Consistent with Child Safe Standard 1: Child safety is embedded in institutional leadership, governance and culture, institutions should have a clear code of conduct that:</p> <p>a. outlines behaviours towards children that the institution considers unacceptable,</p>	<p>The Staff Code addresses the matters set out in Recommendation 7.8 as follows:</p> <ul style="list-style-type: none"> • (Recommendation 7.8(a)) The code contains various provisions outlining unacceptable conduct, including with respect to interactions with students (section 1.1), sexual misconduct (section 1.6) and conduct in a private capacity (section 1.11). 	

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
	<p>including concerning conduct, misconduct or criminal conduct</p> <p>b. includes a specific requirement to report any concerns, breaches or suspected breaches of the code to a person responsible for handling complaints in the institution or to an external authority when required by law and/or the institution's complaint handling policy</p> <p>c. outlines the protections available to individuals who make complaints or reports in good faith to any institution engaging in child-related work (see Recommendation 7.6 on reporter protections).</p>	<ul style="list-style-type: none"> • (Recommendation 7.8(b)) The code requires staff members who have a reasonable concern that another staff member has or intends to breach the code to discuss the matter with their supervisor or another appropriate senior staff member (Introduction section). The code also requires staff members to comply with the School's Child Protection Policy (section 1.5), which in turn contains detailed processes for reporting of particular matters both internally and to external authorities. • (Recommendation 7.8(c)) The Child Protection Policy outlines the following protections: <ul style="list-style-type: none"> - A person acting reasonably and honestly providing information to a person who needs to know that information is generally excused from liability for defamation (section 4.5); - No person may retaliate or take any adverse action against a person, acting reasonably and honestly, who provides information to a person who needs to know that information (section 4.6); • Relevant legislation provides for protections from liability for persons who, acting honestly and reasonably, notify or give information about suspected 'harm' to a student to Child Safety Services or the Policy (section 7.1). 	

Measure 1.2:

Improvements to institutional responding and reporting. This includes actions such as:

- implementing and maintaining effective complaint handling policies and procedures in place that set out how the institution should respond to complaints of child sexual abuse,
- ensuring these policies and procedures are understood by children, staff, volunteers and families, and
- appropriate follow-up by the institution after a complaint is made informed by a risk assessment framework that prioritises the safety of children.

Report Volume:

Volume 7.

Recommendation(s) the measure is in response to:

Recommendations 7.7 and 7.8.

Description of measures implemented prior to December 2020 and prospective work that will be undertaken post-2020 to implement this measure:

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
7.7	Consistent with Child Safe Standard 6: Processes to respond to complaints of child sexual abuse are child focused, institutions should have a clear, accessible and child-focused complaint handling policy and procedure that sets out how the institution should respond to complaints of child sexual abuse. The	BGS's <i>Child Protection Policy and Child Risk Management Strategy (Child Protection Policy)</i> sets out comprehensive processes and procedures for reporting, responding to and investigating complaints of child sexual abuse (see Annexure B). Further, the policy: <ul style="list-style-type: none">• Requires the School to provide appropriate support to students who have been or are suspected to have been harmed or at risk of harm, including (without limitation) through professional counselling (section 4.1, 4.10, 7.2);	BGS will review the Child Protection Policy in 2021 as part of its annual review process.

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
	<p>complaint handling policy and procedure should cover:</p> <ol style="list-style-type: none"> Making a complaint Responding to a complaint Investigating a complaint Providing support and assistance Achieving systemic improvements following a complaint. 	<ul style="list-style-type: none"> Requires the School to cooperate with external authorities, including police and child safety services, to address allegations of harm or inappropriate behaviour (section 4.1); Acknowledges that best practice in relation to child protection is a continual process and that the School's approach will need to be monitored and developed as appropriate (Annexure E, section 3(e)); Requires the School to develop a process of review of each adverse event with a view to identifying what can be learned from the event and if necessary, implementing changes to current policy and procedures (Annexure E, section 5); The Child Protection Committee has developed a causal relationship flowchart draft. In responding to child protection issues, the Committee refers to the flowchart as part of a review process of each complaint. <p>The Child Protection Policy is reviewed at least annually and was last updated in April 2020.</p>	
7.8	<p>Consistent with Child Safe Standard 1: Child safety is embedded in institutional leadership, governance and culture, institutions should have a clear code of conduct that:</p> <ol style="list-style-type: none"> outlines behaviours towards children that the institution considers unacceptable, including concerning conduct, misconduct or criminal conduct includes a specific requirement to report any concerns, breaches or 	<p>The Staff Code addresses the matters set out in Recommendation 7.8 as follows:</p> <ul style="list-style-type: none"> (Recommendation 7.8(a)) The code contains various provisions outlining unacceptable conduct, including with respect to interactions with students (section 1.1), sexual misconduct (section 1.6) and conduct in a private capacity (section 1.11). (Recommendation 7.8(b)) The code requires staff members who have a reasonable concern that another staff member has or intends to breach the code to discuss the matter with their supervisor or another appropriate senior staff member (Introduction section). The code also requires staff members 	<p>BGS will continue to review and, if necessary, update the Staff Code.</p> <p>Considerable time has been spent by the Australian Childhood Foundation in reviewing the Staff Code as part of the School's efforts to gain accreditation. The School continues to refine the Staff</p>

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
	<p>suspected breaches of the code to a person responsible for handling complaints in the institution or to an external authority when required by law and/or the institution's complaint handling policy</p> <p>c. outlines the protections available to individuals who make complaints or reports in good faith to any institution engaging in child-related work (see Recommendation 7.6 on reporter protections).</p>	<p>to comply with the School's Child Protection Policy (section 1.5), which in turn contains detailed processes for reporting of particular matters to external authorities.</p> <ul style="list-style-type: none"> • (Recommendation 7.8(c)) The Child Protection Policy outlines the following protections: <ul style="list-style-type: none"> - A person acting reasonably and honestly providing information to a person who needs to know that information is generally excused from liability for defamation (section 4.5); - No person may retaliate or take any adverse action against a person, acting reasonably and honestly, who provides information to a person who needs to know that information (section 4.6); - Relevant legislation provides for protections from liability for persons who, acting honestly and reasonably, notify or give information about suspected 'harm' to a student to Child Safety Services or the police (section 7.1). 	<p>Code to ensure it is more accessible to staff.</p>

Measure 1.3:

Improvements to recordkeeping and information sharing:

- institutions should implement the Royal Commission's principles for records and recordkeeping to a level that respond to the risk of child sexual abuse occurring within institutions.

Report Volume:

Volume 8.

Recommendation(s) the measure is in response to:

Recommendations 8.1 and 8.4.

Description of measures implemented prior to December 2020 and prospective work that will be undertaken post-2020 to implement this measure:

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
8.1	To allow for delayed disclosure of abuse by victims and take account of limitation periods for civil actions for child sexual abuse, institutions that engage in child-related work should retain, for at least 45 years, records relating to child sexual abuse that has occurred or is alleged to have occurred.	All digital and hard copy files for each student are merged and archived when the student completes Year 12, or otherwise leaves the School. These records are retained indefinitely.	The School will continue to modify and streamline the process to accurately store current and past student information. The School, as a statutory body in Queensland, will continue to be governed by the State Archivist's policies and procedures.
8.4	All institutions that engage in child-related work should implement the following principles for records and recordkeeping, to a level that responds to the risk of child sexual abuse occurring within the institution:	See specific responses below.	See specific responses below.
	<p>Principle 1: Creating and keeping full and accurate records relevant to child safety and wellbeing, including child sexual abuse, is in the best interests of children and should be an integral part of institutional leadership, governance and culture.</p> <p>Institutions that care for or provide services to children must keep the best interests of the child uppermost in all aspects of their conduct, including recordkeeping. It is in the</p>	<p>In 2014, the School introduced an in-house electronic system to record and monitor student wellbeing, called the Student Wellbeing Register. The register provides an individual and central record for each student of all concerns or issues about their behaviour and overall process at the School.</p> <p>The register covers both day and boarding students. All teachers have access to the register to view and comment on student progress, or to highlight concerns, and have been provided training on its use.</p>	<p>In 2021 the School will continue to implement its document retention and management system. An external audit to be performed by the Australian Childhood Foundation (see comments at 6.4 above) will further review that system in the next two years.</p>

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
	<p>best interest of children that institutions foster a culture in which the creation and management of accurate records are integral parts of the institution's operations and governance.</p>	<p>Information on the register about a student is monitored and followed up by the student's Form Tutor, Head of Year, Assistant Head of Year, Director of Boarding, Head of Residence, Head of Middle School and Deputy Headmaster – Students.</p> <p>The Deputy Headmaster – Students meets weekly with the Student Wellbeing Team to discuss student-related matters. Any student wellbeing issues of a serious nature are tabled at the Senior Leadership Team level and any issues that relate to actual, suspected or likely child harm are immediately reported in accordance with the Child Protection Policy. BGS records any child safety reporting matters in a specific section on the School's Synergetic database. This allows the School to collate specific information regarding child protection issues over time.</p> <p>In addition to the Student Wellbeing Register, numerous other digital and hard copy student records are kept by the School including:</p> <ul style="list-style-type: none"> • Employment documents; • Copies of medical and psychological reports; • External education assessments; • Other external reports; • Attendance records; • Parent details; • Behavioural files; • Medical action plans; • Family court orders and other important family information; • Academic records; • Extracurricular and co-curricular involvement records; • Counselling records; 	

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
		<ul style="list-style-type: none"> • Learning support needs; and • Records of interventions, including correspondence with families about their child's progress, behaviour and involvement. <p>All digital and hard copy files for each student are merged and archived when the student completes Year 12, or otherwise leaves the School. These records are retained indefinitely.</p> <p>There are specific record keeping requirements under the School's policies, including the Child Protection Policy and the <i>Counselling Policy</i>.</p>	
	<p>Principle 2: Full and accurate records should be created about all incidents, responses and decisions affecting child safety and wellbeing, including child sexual abuse.</p> <p>Institutions should ensure that records are created to document any identified incidents of grooming, inappropriate behaviour (including breaches of institutional codes of conduct) or child sexual abuse and all responses to such incidents. Records created by institutions should be clear, objective and thorough. They should be created at, or as close as possible to, the time the incidents occurred, and clearly show</p>	<p>See comments above in respect of Principle 1.</p> <p>In addition, the Child Protection Policy contains detailed procedures for the immediate reporting of child safety matters (both internally and externally) (see Annexures A, B and C). Relevantly, the policy requires all Staff, when reporting 'harm', 'sexual abuse' or 'inappropriate behaviour', to use a template incident report form which requires staff members to specify:</p> <ul style="list-style-type: none"> • Their personal details; • Their reason for making the report; • Details of the affected child; • Details of the alleged harm, sexual abuse or inappropriate behaviour; • Actions taken; and • The date of the report (see Annexure D). <p>In 2015, the School developed a central record of all matters dealt with under the Child Protection Policy, including any</p>	<p>Existing systems will be reviewed as part of the external audit conducted by the Australian Childhood Foundation (see comments at 6.4 above).</p>

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
	the author (whether individual or institutional) and the date created.	contact made by the School with external authorities such as police or Child Safety Services about its students or staff.	
	<p>Principle 3: Records relevant to child safety and wellbeing, including child sexual abuse, should be maintained appropriately.</p> <p>Records relevant to child safety and wellbeing, including child sexual abuse, should be maintained in an indexed, logical and secure manner. Associated records should be collocated or cross-referenced to ensure that people using those records are aware of all relevant information.</p>	See comments above in respect of Principle 1.	Existing systems will be reviewed as part of the external audit conducted by the Australian Childhood Foundation (see comments at 6.4 above).
	<p>Principle 4: Records relevant to child safety and wellbeing, including child sexual abuse, should only be disposed of in accordance with law or policy.</p> <p>Records relevant to child safety and wellbeing, including child sexual abuse, must only be destroyed in accordance with records disposal schedules or published institutional policies. Records relevant to child sexual abuse should be subject to minimum retention periods that allow for delayed disclosure of abuse by victims, and take account of</p>	<p>See comments above in respect of Principle 1.</p> <p>The School adopts a document destruction freeze in relation to any documentation that may be potentially relevant to matters involving child protection.</p>	Existing systems will be reviewed as part of the external audit conducted by the Australian Childhood Foundation (see comments at 6.4 above).

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
	<p>limitation periods for civil actions for child sexual abuse.</p>		
	<p>Principle 5: Individuals’ existing rights to access, amend or annotate records about themselves should be recognised to the fullest extent. Individuals whose childhoods are documented in institutional records should have a right to access records made about them. Full access should be given unless contrary to law. Specific, not generic, explanations should be provided in any case where a record, or part of a record, is withheld or redacted. Individuals should be made aware of, and assisted to assert, their existing rights to request that records containing their personal information be amended or annotated, and to seek review or appeal of decisions refusing access, amendment or annotation.</p>	<p>See comments above in respect of Principle 1.</p>	<p>The School will continue to share information with relevant individuals in accordance with relevant policies and procedures.</p>

Theme 2: Children's voices

Measure 2.1:

Children participate in decisions that affect them.

- information and examples about how children are able to express their views and how their voices have been incorporated into child safe practices, including the design of policy and decision-making.

Report Volume:

Volume 6.

Recommendation(s) the measure is in response to:

Recommendations 6.5 and 6.6.

Description of measures implemented prior to December 2020 and prospective work that will be undertaken post-2020 to implement this measure:

Please refer to Theme 1 **above** for the School's comments in relation to Recommendations 6.5 and 6.6.

Section 3: Reporting for specific non-government institutions

Institution-specific Recommendations - Schools

Report Volume:

Volume 13.

Recommendation(s) the measure is in response to:

Recommendations 13.1 – 13.8.

Description of measures implemented prior to December 2020 and prospective work that will be undertaken post-2020 to implement this measure:

No.	Recommendation	Description of measures implemented prior to December 2020:	Prospective work that will be undertaken post-2020 to implement this measure:
13.1	All schools should implement the Child Safe Standards identified by the Royal Commission.	See specific responses at Measure 1 above in relation to the implementation of the Child Safe Standards.	See specific responses at Measure 1 above in relation to the implementation of the Child Safe Standards.
13.2	State and territory independent oversight authorities responsible for implementing the Child Safe Standards (see Recommendation 6.10) should delegate to school registration authorities the responsibility for monitoring and enforcing the Child Safe Standards in government and non-government schools.	Not applicable.	Not applicable.

13.3	School registration authorities should place particular emphasis on monitoring government and non-government boarding schools to ensure they meet the Child Safe Standards. Policy guidance and practical support should be provided to all boarding schools to meet these standards, including advice on complaint handling.	Not applicable.	Not applicable.
13.4	The Australian Government and state and territory governments should ensure that needs-based funding arrangements for Aboriginal and Torres Strait Islander boarding students are sufficient for schools and hostels to create child safe environments.	Not applicable.	Not applicable.
13.5	Boarding hostels for children and young people should implement the Child Safe Standards identified by the Royal Commission. State and territory independent oversight authorities should monitor and enforce the Child Safe Standards in these institutions.	See specific responses at Measure 1 above in relation to the implementation of the Child Safe Standards.	See specific responses at Measure 1 above in relation to the implementation of the Child Safe Standards.
13.6	Consistent with the Child Safe Standards, complaint handling policies for schools (see Recommendation 7.7) should include effective policies and procedures for managing complaints about children with harmful sexual behaviours.	See specific responses at Measure 1 above in relation to the implementation of the Child Safe Standards.	See specific responses at Measure 1 above in relation to the implementation of the Child Safe Standards.
13.7	State and territory governments should provide nationally consistent	Not applicable.	Not applicable.

	and easily accessible guidance to teachers and principals on preventing and responding to child sexual abuse in all government and non-government schools.		
13.8	The Council of Australian Governments (COAG) should consider strengthening teacher registration requirements to better protect children from sexual abuse in schools. In particular, COAG should review minimum national requirements for assessing the suitability of teachers, and conducting disciplinary investigations.	Not applicable.	Not applicable.