

**2020 Report on St Paul's School to the National Office for Child Safety regarding
progress on the implementation of recommendations of the Royal Commission into
Institutional Responses to Child Sexual Abuse**

Prepared by the Anglican Schools Commission, on behalf of Diocesan Council, of the
Corporation of the Synod of the Diocese of Brisbane, also known as the Anglican Church
Southern Queensland (ACSQ).

1. ST PAUL'S SCHOOL

St Paul's School is a Pre-Prep to Year 12 Anglican School, located in Bald Hills, Brisbane. St Paul's also operates an International School and offers home stay accommodation to international students.

The governing body of St Paul's School is the Diocesan Council of the Corporation of the Synod of the Diocese of Brisbane, also known as the Anglican Church Southern Queensland (ACSQ). St Paul's School is one of eleven schools that the ACSQ governs with the support of school councils and the Anglican Schools Commission (ASC).

The purpose of the ASC is to provide strategic direction and policy development to, and monitoring of, Anglican schools of the ACSQ.

The ACSQ serves the community through its five commissions: the ASC, Community Services Commission (Anglicare), Finance and Diocesan Services Commission, Ministry Education Commission and the Parish and Other Mission Agencies Commission.

2. REPORTING

This section reports progress relating to:

- recommendations from the Royal Commission into Institutional Responses to Child Sexual Abuse that are relevant to all institutions, along with
- specific recommendations that schools are responsible for implementing, namely 13.1 and 13.6.

This is done so using the themes and measures provided by the National Office of Child Safety in their reporting request.

THEME 1: MAKING INSTITUTIONS CHILD SAFE

MEASURE 1.1: IMPLEMENTATION OF THE NATIONAL PRINCIPLES FOR CHILD SAFE ORGANISATIONS

AND

MEASURE 1.2 IMPROVEMENTS TO INSTITUTIONAL RESPONDING AND REPORTING

KEY ACTIONS:

- IMPLEMENTING CHILD SAFE STANDARDS IDENTIFIED BY THE ROYAL COMMISSION (REC. 13.1) - INTERPRETED AS IMPLEMENTING THE NATIONAL PRINCIPLES FOR CHILD SAFE ORGANISATIONS
- EFFECTIVE POLICIES AND PROCEDURES FOR MANAGING COMPLAINTS ABOUT CHILDREN WITH HARMFUL SEXUAL BEHAVIOURS (REC 13.6)
- IMPLEMENTING AND UPDATING CHILD SAFE POLICIES AND PROCEDURES
- MAINTAINING RISK MANAGEMENT STRATEGIES FOR A CHILD SAFE INSTITUTION
- IMPLEMENTING AND MAINTAINING EFFECTIVE COMPLAINTS HANDLING POLICIES AND PROCEDURES THAT SET OUT HOW THE INSTITUTION SHOULD RESPOND TO COMPLAINTS OF CHILD SEXUAL ABUSE
- APPROPRIATE FOLLOW-UP BY AN INSTITUTION AFTER A COMPLAINT IS MADE INFORMED BY A RISK ASSESSMENT FRAMEWORK THAT PRIORITISES THE SAFETY OF CHILDREN.

Since 2015, the ASC has provided school specific policies and procedures related to child safety. This has supported a consistent approach across our schooling system. Most recently, in August 2020, implementation commenced on the Working with Children in Anglican Education Policy, Guidelines and Procedures. The purpose of the Policy is to reflect and provide a policy foundation for Anglican Schools and Education & Care Services' commitment and capacity to create safe and nurturing environments for the children and young people they serve.

The Policy establishes responsibilities for the application of child safe principles and practices within school and service operations, using the governance, development and implementation

of Child and Youth Risk Management Strategies, to provide a mechanism to drive effective actions, where responsibilities are consciously and systematically met.

Under Queensland's *Working with Children (Risk Management and Screening) Act 2000*, each school and service are required to have a Child and Youth Risk Management Strategy that is reviewed annually. To do so, schools and services are provided direction and guidance through the Working with Children in Anglican Education Policy, Guidelines and Procedures. In addition to detailing all relevant legal and canonical requirements, these documents provide guidance on action planning and continuous improvement through applying the National Principles for Child Safe Organisations within a school or service's operations.

Commencing in 2021, as part of the Working with Children in Anglican Education Policy, schools and services are required to provide a dedicated written report annually, to Diocesan Council, through the ASC, on relevant matters. This is supported by a structure of quarterly reflection and reporting internally within the school or service, and includes reporting on any issues identified due to a child safety or risk management matter, that are relevant to the development and maintenance of a child safe culture.

In each school the implementation of the Working with Children in Anglican Education Policy; the application of the Guidelines and Procedures; and the development, implementation and review of Child and Youth Risk Management Strategies are assisted by a Child and Youth Risk Management Committee. This includes quarterly reporting to the Head of School and School Council.

This Committee has membership that represents the variety of contexts that each Child and Youth Risk Management Strategy relates to. Members are required to facilitate collaboration with a range of stakeholders from within these contexts, including children, young people, parents, staff and volunteers.

Each school and service is required to detail in their Child and Youth Risk Management Strategy, actions taken to provide communication and support to relevant stakeholders, such as students, parents, staff, volunteers and the school community; regarding child protection and risk management.

The Working with Children Guidelines and Procedures provide specific areas for reflection regarding meaningful engagement with and participation of children and young people and their families. This is supported by dedicated resources, published by the ASC, such as:

- Student Protection in Anglican Schools: A Guide for Students and Parents (currently under review)
- Code of Conduct: Children's Resource

Schools and services can cater specific strategies to their localised needs. For example, at St Paul's School, international students are provided with child protection information as part of their induction and orientation to the School and Home Stay. Information is provided in a manner considerate of the child's communication and cultural needs. On an ongoing basis this information is reinforced through activities undertaken in tutor groups and dedicated Student Protection Officers, as well as written information in their handbook and visual displays in classrooms.

At minimum, all new staff and volunteers are provided information during induction and existing staff participate in annual training on relevant policies, procedures and processes. Volunteers are inducted on an annual basis. Induction of staff and volunteers includes key information regarding child protection, code of conduct, and child and youth risk management; provides key information on responsibilities, recognition and reporting processes; and provides a self-assessment and acknowledgement of understanding.

Each school has dedicated Student Protection Officers. The legislated role of the Student Protection Officer is to be a contact person for students to report the conduct of staff that students consider inappropriate (section 16(3) of the *Education (Accreditation of Non-State Schools) Regulation 2017*). The Student Protection Officer role in Anglican Schools has developed into a broader, vital role in helping create a child safe environment for students, and helping the school meet their broader child safety responsibilities. This includes:

- Being a key contact person and support for students when they are concerned for their own, or other's safety or wellbeing
- Being a key contact and support for families, volunteers, staff and visitors
- Assisting the school meet responsibilities through, for example, implementing approved reporting processes and facilitation of training
- Championing a culture of child safety and wellbeing

For example, at St Paul's School, Student Protection Officers are available across key areas of the school community, such as the Junior School, International School, Sport and School Counsellors located at the Wellbeing Centre.

Student Protection Officers are often complemented by a variety of other pastoral care roles within schools such as 'house leaders', 'group leaders', 'heads' of specific cohorts, psychologists, counsellors and chaplains.

In the management of specific matters, schools and services are required to use the Student Protection in Anglican Schools, and Child Protection in Anglican Education & Care Services policies and procedures (inclusive of forms and resources). These are complemented by complaints management, and whistleblowing policies and procedures which outline action to take if there is a concern student/child protection policies and procedures are not being applied.

The Student Protection in Anglican Schools and the Child Protection in Anglican Education & Care Services policies and procedures, implemented in 2018, are currently under review, with new versions planned for implementation during 2021. A key component of the review is focused on strengthening the application and implementation of Principle 6 of the National Principles for Child Safe Organisations (processes to respond to complaints and concerns are child focused) and relevant key action areas; along with related recommendations, such as 7.7 and 13.6 of the Royal Commission.

The implementation of relevant policies and procedures and actions taken to maintain risk management strategies within schools are further complemented by:

- The support provided by the ASC's dedicated resources. The Child Safety and Wellbeing Advocate and the Online Safety and Digital Wellbeing Advocate. Support includes:
 - Stewardship and coordination of the approach to child safety and wellbeing;

- Consultation and guidance on child safety and child & youth risk management;
- Development and facilitation of relevant training; and
- Design and implementation of relevant policies, procedures, guidelines, tools and resources.
- The policy requirement to notify the ACSQ of all matters that require reporting to statutory authorities and all matters that relate to concerns of inappropriate behaviour by staff or volunteers. The management of these matters is actively supported by both the ASC and the ACSQ's Office of the Director of Professional Standards (DPS).
- ACSQ's Child Safety Audit program. The DPS engages a suitably qualified Auditor, external to the Church, who Audits schools on their child safety responsibilities. Audit outcomes and progress on the implementation of recommendations are reported to the ACSQ's Diocesan Council. St Paul's School was last audited in 2017. Schools are also subject to external review, such as cyclical reviews through the Non-State School Accreditation Board (NSSAB) and Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS). For St Paul's School, these reviews last occurred in 2019.

KEY ACTION: CODE OF CONDUCT

The ACSQ's Code of Conduct for Anglican Schools and Education & Care Services, titled *Our Commitment: Creating Environments for Children and Young People to Thrive*, was approved in 2018 by the Standing Committee of the Anglican Church of Australia. This approval is consistent with the National Church's Safe Ministry to Children Canon.

The Code sets clear behavioural standards that all staff and volunteers are required to comply with. The Code has a dedicated chapter regarding expected conduct towards children and young people, providing both standards and guidelines to outline behaviours that are considered unacceptable.

The Code also details responsibilities for all persons with appropriate authority to implement and maintain proper systems for the safety and welfare of children and young people. These responsibilities cannot be delegated.

The Code is complementary to and, where relevant, consistent with the Anglican Church of Australia's *Faithfulness in Service*, a national code for personal behaviour and the practice of pastoral ministry by clergy and church workers.

As part of the Code, all staff and volunteers are required to speak with an appropriate authority if they have any concerns. The Code specifically directs staff and volunteers to follow relevant child/student protection policies and procedures where they suspect a child or young person has been harmed or is at risk of harm from abuse or neglect, or if they know or suspect another staff member or volunteer has demonstrated inappropriate behaviour. These policies and procedures detail internal and external reporting requirements.

The Code, consistent with other policies such as those regarding whistleblowing and complaints management, also directs that staff and volunteers are not to be penalised, discriminated or have action taken against them because of any action taken in good faith under the Code.

Following approval, the Code was implemented throughout 2019 and 2020 across all schools and education & care services governed by ACSQ. The Code applies to staff and volunteers undertaking their role, including, but not limited to:

- behaviour that includes, relates to, or impacts upon a person who the staff member or volunteer has contact with as part of their role within the school or service; and
- behaviour that occurs in a physical or online environment.

All persons are required to acknowledge their acceptance and understanding of the Code prior to and as a condition of their engagement. This requirement, along with other child safe strategies, is embedded in the Recruitment and Selection in Anglican Schools Policy.

Schools and services were supported in implementing the Code, through dedicated train the trainer sessions, implementation resources and consultation provided by the ASC's Child Safety and Wellbeing Advocate; and were required to report to the ASC on successful implementation.

KEY ACTION: MAINTAINING TRAINING FOR STAFF AND VOLUNTEERS ON THEIR CHILD SAFETY OBLIGATIONS AND BEHAVIOURAL EXPECTATIONS

As discussed in the previous section, all new staff and volunteers are provided information during induction, and existing staff participate in annual training on relevant policies, procedures and processes. Volunteers are inducted on an annual basis.

Induction of staff and volunteers includes key information on child protection, code of conduct and child and youth risk management; provides key information on responsibilities and reporting processes; provides a self-assessment and requires written acknowledgement of understanding.

Developed by the ASC, all new staff also complete an online training module, Safeguarding Our Students; and each year, all staff complete annual child protection training.

This training also includes participant's completion of a knowledge check and acknowledgement of understanding regarding key training components. Staff are also actively encouraged to further engage with Student Protection Officers for additional guidance.

Complementary to this training, staff are provided with information regarding online safety. Cyber safety is supported by the ASC's Online Safety and Digital Wellbeing Advocate, and each School has dedicated Cyber Safety Champions. These staff implement strategies across schools, with children and young people, their families and staff, with a focus on online safety and digital wellbeing for students.

Student Protection Officers complete an induction with the ASC's Child Safety and Wellbeing Advocate and each year are provided with dedicated professional development. The topic planned for 2021 relates to the impact of severe developmental adversity on children and young people's ability to learn, to connect, and to manage emotional stress, and the implications for education professionals. Previous topics have included:

- The National Principles for Child Safe Organisations
- Managing disclosures
- Grooming and sexual abuse
- Connections between child protection and family law

Subsequently, each year, a consolidated version of this training is provided to all relevant school staff.

Topics to be discussed in the 2021 annual child protection training for staff includes:

- Putting Children First, as per the theme of Child Protection Week 2020, including a personal reflection activity.
- Recognising and responding to abuse, including information relating to:
 - Signs of abuse and neglect, including resources on:
 - Physical abuse
 - Neglect
 - Sexual abuse, including child sexual exploitation and harmful sexual behaviour
 - Emotional abuse
 - Domestic abuse
 - Bullying and cyberbullying
 - Unhealthy relationships
 - Identifying concerns, including responding to disclosures and record keeping
 - How to help children and young people disclose, including creating an environment that encourages children and young people to seek help and support
- Student and Child Protection Processes in Anglican Schools and Education & Care Services. Key topics covered include legal and policy obligations regarding:
 - The need to immediately raise concerns related to a child or young person's safety or wellbeing.
 - Expected conduct and actions to take if concerned about either their own, or another's conduct.
 - Actions to be taken should there be concern schools and services are not sufficiently implementing processes.
 - Actions that will be taken to support children and families.
 - Reporting of suspicions that a child may be in need of protection to Queensland's Child Safety services.
 - Reporting of suspected sexual abuse or likely sexual abuse to Police.
 - Reporting of relevant matters to the Queensland College of Teachers.
- Child and Youth Risk Management Strategies, including information on the National Principles of Child Safe Organisations and Rights of the Child, and the importance of understanding the role each person has in assessing, mitigating, managing and responding to risks to the safety of children and young people

MEASURE 1.3 IMPROVEMENTS TO RECORD KEEPING AND INFORMATION SHARING

KEY ACTION: INSTITUTIONS SHOULD IMPLEMENT THE ROYAL COMMISSION'S PRINCIPLES FOR RECORDKEEPING TO A LEVEL THAT RESPONDS TO THE RISK OF CHILD SEXUAL ABUSE OCCURRING WITHIN INSTITUTIONS

In addition to regulatory requirements, the ACSQ requires schools to maintain suitable record keeping and provides minimum requirements in the approved Records Retention Schedule for Anglican Schools in the Diocese of Brisbane (2018). Both the ASC and the Diocesan Archivist support schools in meeting these requirements. The Schedule includes, for example, the requirements to:

- permanently retain records relating to notifications, allegations, investigations and reports, and any related records where a person reasonably suspects harm or a risk of harm to a student, including action taken. This includes management of students subject to a relevant court order (e.g. child protection order).
- permanently retain records relating to summary information for individual staff members, contractors and volunteers. Summary information includes: name of individual, date of birth, date of appointment, date of separation, rates of salary and allowances, individual employment agreement, position titles, dates positions were held, teacher and non-practising teacher registration, security check completion, evidence of professional learning and grievances.
- permanently retain records (for students of Indigenous origin or in out of home care) and retain for 75 years from birth, (other students) summary information for individual students covering a range of student management activities. Summary information includes: demographic details including relationships, past academic record, enrolment, attendance, awards and scholarships, international status, medical and welfare history, results, Year 12 School Reference, courses, house, suspensions, co-curricular activities, transfers, work experience/ placements and teacher observations.

Also, the Working with Children in Anglican Education Guidelines and Procedures, the Student Protection in Anglican Schools policy and procedures, and complementary complaints management and whistleblower policies and procedures, as well as the Our Commitment, Code of Conduct, complement and reinforce application of the Principles outlined in recommendation 8.4 of the Royal Commission into Institutional Responses to Child Sexual Abuse:

1. Creating and keeping full and accurate records relevant to child safety and wellbeing, is in the best interests of children and should be an integral part of institutional leadership, governance and culture.
2. Full and accurate records should be created about all incidents, responses and decisions affecting child safety and wellbeing.
3. Records relevant to child safety and wellbeing should be maintained appropriately.
4. Records relevant to child safety and wellbeing, should only be disposed of in accordance with law or policy.
5. Individuals' existing rights to access, amend or annotate records about themselves should be recognised to the fullest extent.

Staff are reminded of the importance of record keeping, and provided with appropriate strategies, in annual child protection training (as discussed earlier in this report).

Information sharing regarding specific persons, is guided by the Student Protection in Anglican Schools Policy and Procedures, and considerate of applicable laws, such as the Queensland *Child Protection Act 1999* and the Australian Privacy Principles.

As discussed earlier in this report, commencing in 2021, as part of the Working with Children in Anglican Education Policy, schools are required to provide a dedicated written report, annually, to Diocesan Council, through the ASC, on relevant matters. This is supported by a structure of quarterly written reporting internally within each school, to their Head of School and School Council, by the Chair of their Child and Youth Risk Management Committee. This quarterly written report includes analysis on any issues identified due to a child safety or risk management matter that are relevant to the development and maintenance of a child safe culture.

THEME 2: CHILDREN'S VOICES

MEASURE 2.1 CHILDREN PARTICIPATE IN DECISIONS THAT AFFECT THEM

KEY ACTION: 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

Dating back to 2016, schools have been given guidance through policy and procedures regarding the importance of including students in planning and decision making, particularly relating to child and youth risk management.

Released in August 2020, the Working with Children in Anglican Education Guidelines and Procedure continues to encourage inclusion of students in the work of the Child and Youth Risk Management Committee and provides further advice on student participation.

Within the Guidelines, schools are asked to consider contemporary best practice regarding the participation of children and young people, through focusing on the outcomes sought to be achieved by both the National Principles (particularly Principle 2) and the National Convention on the Rights of the Child (particularly Article 12), through practical actions. Development of actions are guided by resources, information and questions for reflection. Key action areas of the National Principles and relevant recommendations from the Royal Commission are used as a basis for this reflection.

At St Paul's School, Student Leaders meet once a fortnight with the Senior Leadership Team, with the meeting chaired by the School Captains. The focus of these discussions regularly relates to School culture and observable behaviours from both staff and students. Student protection is systematically discussed as a topic and the Leaders participate in the review of the School's Child and Youth Risk Management Strategy. An example of where student voice has been incorporated into child safe practices, is in the identity of the School's Student Protection Officers. Feedback was provided on a stigma within the student population attached to students for seeing a 'School Counsellor'. This posed a problem as students needing to see a Counsellor or Student Protection Officer may not do so. The School has subsequently:

- extended Student Protection Officers to five staff in positions exposed to different departments around the School; and
- promoted the use of School Counsellors and the variety of services they provide, e.g.: careers advice.

As discussed earlier in this report, the Student Protection Policy and Procedure is currently under review. Collaboration with schools on revised versions will include schools working with students to provide input.

3. ATTACHMENTS

- a) Code of conduct: Our Commitment – Creating environments for children and young people to thrive
- b) Code of conduct: Children's Resource
- c) Working with Children in Anglican Education Policy