



**Caloundra City  
Private School**

***Student Safety and Wellbeing – Raising and Responding to Concerns Policy***

<b>Last Review:</b> November 2025	<b>Constructed / Reviewed by:</b> Russell Kennedy Lawyers/CCPS Company Secretary
<b>Next Review:</b> November 2027 (and every two years thereafter in accordance with the School's review cycle, or more frequently as required)	<b>Approval Required:</b> CCPS Risk and Compliance Committee and CCPS Board
	<b>Board Sign Off Date:</b> 12 <sup>th</sup> November 2025 <b>Implementation Date:</b> 13 <sup>th</sup> November 2025

## 1 Statement of Context and Purpose

Caloundra City Private School is committed to protecting its students from all aspects of harm, and has established strategies, practices, policies and procedures to uphold this public commitment.

This policy sets out in an accessible, child focused, culturally safe and easily understood manner, the ways in which concerns about all forms of child abuse:

- may be brought to the School's attention; and
- will otherwise be dealt with, both internally and in accordance with the School's external reporting obligations.

Other concerns may be raised by members of the school community in accordance with the *Grievances Policy (Community)*.

This policy is a procedure for responding to and reporting child abuse allegations as part of the School's student safety and wellbeing framework (underpinned by the *Student Safety and Wellbeing Policy*), and for the purpose of Queensland's Child Safe Standards.

## 2 Application

This policy applies to all Board members, employees, volunteers, contractors and other authorised personnel required to perform functions on the School's premises, or at school-organised activities and events. Collectively, these individuals are referred to as 'staff'.

This policy extends to any other person who is engaged in student-connected work at the School, or that otherwise has direct and regular contact with the School's students (whether supervised or not).

## 3 Related Documents

### Legislation

- *Child Protection Act 1999* (Qld)
  - *Working with Children (Risk Management and Screening) Act 2000* (Qld)
  - *Education (General Provisions) Act 2006* (Qld)
  - *Education (General Provisions) Regulation 2017* (Qld)
  - *Education (Queensland College of Teachers) Act 2005* (Qld)
  - *Public Records Act 2023* (Qld)
  - *Criminal Code Act 1899* (Qld)
  - *Child Safe Organisation Act 2024* (Qld)
- (a) Code of Ethics for Teachers in Queensland

## Overview of Student Safety and Wellbeing policies and documents

Document	Overview
<i>Student Safety and Wellbeing Policy</i>	This policy sets out the School's overarching obligations and commitment to ensuring student safety and wellbeing, and summarises the School's strategies for achieving these. The policy also explains how the School's other student safety and wellbeing policies and procedures interact.
<i>Student Safety and Wellbeing - Staff Code of Conduct</i>	This code outlines staff behaviours which align with the School's commitment to student safety and wellbeing, and what behaviours are unacceptable.
<i>Student Safety and Wellbeing - Raising and Responding to Concerns Policy</i>	This policy outlines how members of the school community may raise concerns about child abuse and other student safety and wellbeing matters. This policy sets out how the School will respond to such concerns (including by complying with the School's mandatory reporting obligations).
<i>Student Safety and Wellbeing – Recruitment and Employment Policy</i>	This policy outlines the School's approach to ensuring student safety and wellbeing is a paramount consideration in the School's recruitment and employment practices.

## Fact sheets

- [Laws targeting sexual offences against children | Queensland Government](#)
- [Child Protection Guide | Department of Families, Seniors, Disability Services and Child Safety](#)
- [Reporting and referring concerns | Department of Families, Seniors, Disability Services and Child Safety](#)
- [Children and young people in care | Department of Families, Seniors, Disability Services and Child Safety](#)
- [Child Protection Guide | Department of Child Safety, Youth and Women](#)

## **4 Relevant Principles**

Staff have a variety of mandatory reporting obligations in relation to concerns about child abuse or other student safety and wellbeing matters. The School is guided by this policy to fulfil its (and its staff's) obligations and aims to ensure that:

- Staff, students and members of the school community feel encouraged to raise concerns in accordance with this policy.
- Contact details of Student Safety Officers are readily available and widely known to the school community.

- All concerns are treated seriously, with the utmost importance and are responded to in a prompt, appropriate, sensitive and thorough fashion.
- The School and its staff have knowledge and an understanding of their legal obligations with their reporting obligations, and comply with these proactively.
- The School's processes for responding to concerns (and the complaints process generally) are legally compliant (with regard to privacy laws, reporting obligations and employment law), culturally safe and understood broadly - including by children and young people, families and staff.
- Investigations are conducted fairly and without bias, promptly and without undue delay.
- All reasonable steps are taken to protect the identity and wellbeing of a student who is the subject of a concern, and no adverse action is taken against a person who raises a concern (or is a child or young person who is the alleged victim of child abuse).
- All reasonable steps are taken to co-operate with law enforcement agencies regarding concerns, and that these are reported to relevant authorities regardless of the legal obligation to do so.
- Members of the school community understand and have confidence in the processes that will be followed by the School in response to concerns.
- This policy is student-focused and can be easily understood by the school community, in particular students.

When complying with this policy, it must be appreciated that fulfilling the roles and responsibilities contained herein will not displace or discharge any other obligations that arise if a person reasonably believes that a student is at risk of child abuse.

## **5 How the school community may raise concerns with the School**

***If you have a belief that a student is in immediate danger, you should immediately phone the Police on 000.***

If you are a member of the school community (other than a member of staff), with a concern about child abuse or other student safety and wellbeing matters, then you are encouraged to raise that concern with the Principal, a member of the Senior Leadership Team, or a Student Safety Officer.

Relevant contact details for the School's Student Safety Officers are set out in the below table:

Name	Position	Contact details
Mr Leon van Niekerk	Principal (senior Student Safety Officer)	<a href="mailto:lvanniekerk@ccps.qld.edu.au">lvanniekerk@ccps.qld.edu.au</a>
Mr Kris Naiker	Deputy Principal -Students	<a href="mailto:knaiker@ccps.qld.edu.au">knaiker@ccps.qld.edu.au</a>
Ms Kylie Lush	7/8 Year Level Coach	<a href="mailto:Klush@ccps.qld.edu.au">Klush@ccps.qld.edu.au</a>
Ms Meghan Kostas	9/10 Year Level Coach	<a href="mailto:Mkostas@ccps.qld.edu.au">Mkostas@ccps.qld.edu.au</a>
Mr Sasha Juric	Year 6 & E-Learning Coordinator	<a href="mailto:Sjuric@ccps.qld.edu.au">Sjuric@ccps.qld.edu.au</a>
Student Safety Officers can also be contacted via Enrolments Registrar & Executive Assistant on 075437 5800		

Where a concern relates to a Student Safety Officer, it should be reported to the senior Student Safety Officer.

As the safety and wellbeing of students is the School's paramount consideration, you are encouraged to make a report, whether or not you have formed a belief or suspicion on reasonable grounds that child abuse or other conduct that presents a risk to student safety has occurred.

#### **How staff will deal with their own concerns**

Staff with, or who are aware of concerns must also address any concerns they may have in accordance with this policy.

#### **Concerns about the Principal or the Board**

Where a concern relates to the Principal or a Board member, concerns should be raised with the Chair of the Board via email at [boardchair@ccps.qld.edu.au](mailto:boardchair@ccps.qld.edu.au) or via post: Company Secretary Caloundra City School Ltd P.O Box 542 Golden Beach Qld 4551.

In those circumstances, the Chair of the Board will be responsible for meeting the Principal's responsibilities as set out in this policy.

## **6 The School's Response**

This section sets out how the School will acknowledge a concern.

### **Receiving a concern**

Staff, upon becoming aware of a concern, are required to:

- Listen to the concern in a considerate, patient and supportive manner (and appropriately where the concern is coming from a student).
- Identify the party or parties involved.
- Confirm the basic details, without seeking extensive information, casting judgment or asking suggestive or leading questions.
- Take a detailed file note.
- Remain balanced and not assess the validity of the concern(s) being raised.
- Explain that other people may need to be informed about the concern, in order to stop any inappropriate or unlawful behaviour and to comply with the School's legal obligations and procedures.
- Confirm that the School treats the concern seriously.
- Offer support to the student(s) involved in the concern, and their families. This may include encouragement to access confidential wellbeing and support services, either internal or external to the School.
- Outline the process that will be followed by the School in dealing with the concern, in accordance with this policy.

Staff should then:

- Promptly and thoroughly manage the response of the School (including by monitoring the School's overall compliance with this policy and accounting for alternatives if the staff member allocated to resolve the concern is unable to perform their role).
- Comply with their personal reporting obligations as set out in this policy.
- Notify the Principal, a Student Safety Officer or member of the School Executive Team, about the concern.
- If the Student Safety Officer or member of the School Executive Team is the subject of the concern, notify the Principal about the concern.
  - If the Principal is the subject of the concern, notify the Chair of the Board about the concern.
  -

The School will then take such steps as it considers appropriate to protect any student connected with a concern until it is resolved, including by ensuring that any mandatory reporting obligations are met, and also, that allegations, suspicions or disclosures are made to relevant authorities (including but not limited to Queensland Police, the Department of Families, Seniors, Disability Services and Child Safety -through Child Safety Services Centres, the Queensland Family and Child Commission and the Queensland College of Teachers) have been met, regardless of whether there is a legal obligation to report.

## **Resolving the concern**

The School will investigate the concern where appropriate, which will ordinarily require a determination, on the balance of probabilities, whether the concern is substantiated or not.

When doing so, the School will take into account the diversity and characteristics of the school community to ensure equity is upheld and act to reduce barriers to inclusion.

The decision-maker will usually be the Principal, although where the concern relates to the alleged conduct or misconduct of the Principal then the decision-maker will be the Chair of the Board. The School may rely on legal or third-party assistance to investigate or determine the concern.

Where a concern involves allegations against a staff member, the School will need to notify the staff member about those allegations (to the extent that it is appropriate to do so, which may initially involve only notification that a concern has been raised), outline the process to be followed, and advise the staff member about the process pending the resolution of the concern (which may, in appropriate cases include the staff member being stood down, without judgment, while the concern is being dealt with).

To the extent that the School decides it is appropriate or practicable to do so, any investigation will usually involve:

- Interviewing the subject of the concern and key witnesses or individuals (noting that more than one interview may be required).
- Reviewing relevant documents, correspondence and materials of substance.
- Taking notes of any interviews (or where appropriate, transcripts of audio recordings of any interviews) during the investigation.
- The relevant decision-maker determining whether, on the balance of probabilities, the concern is substantiated.

Witnesses being interviewed will not be unreasonably refused a support person.

If a concern is substantiated, the School will take appropriate action (which may, in the case of a current staff member, potentially include summary dismissal for serious misconduct). Even if a concern is not substantiated, the findings made by the School during the course of investigating the concern may, in certain cases, still result in disciplinary action (including dismissal).

Following the conclusion of its investigation, the School will indicate the outcomes of the investigation to:

- The person, or student who raised the concern.
- The person subject of that concern (where appropriate).
- Any external authorities (including but not limited to Queensland Police, the Department of Families, Seniors, Disability Services and Child Safety –through Child Safety Services Centres, the Queensland Family and Child Commission and the Queensland College of Teachers) to whom a report is required to be made.

This policy applies regardless of whether the alleged behaviour which is the subject of a concern, occurred on or outside School grounds, or concerns current or former students.

It may not be appropriate or possible for the School to investigate a concern in strict accordance with this policy where a concern is raised with the School and:

- An investigation by Queensland Police or the Queensland College of Teachers relevant to the concern is ongoing.
- Civil or criminal proceedings relevant to the concern are ongoing.
- The concern relates to the conduct of current or former students.
- The concern relates to the conduct of former staff.

In such circumstances, the School will seek and act on legal advice to comply with this policy to the extent it is appropriate to do so (and in particular to protect the safety and wellbeing of all current students of the School).

### **Keeping the School informed**

It is the School's preference that members of the school community (including students, staff, volunteers, parents, etc) promptly inform the Principal, a member of the School Executive Team or a Student Safety Officer of any matters on the subject of a potential reporting obligation under this policy which relate to the school community, so that the School can coordinate the information and support the Police and affected students and their families as required.

However, the School appreciates that in some cases it will be necessary for an external report to be made before the School is notified (and nothing in this policy is intended to limit a person's right, or obligation, to make external reports). At the very least, the Principal, a member of the School Executive Team, or a Student Safety Officer should be notified after an external report is made.

### **Reflection and continuous improvement**

The School will analyse concerns and incidents to identify causes and (if applicable) systemic changes to inform continuous improvement.

## **7 Other Considerations**

### **Concerns relating to other students**

This policy also applies to concerns involving the behaviour of other students.

For example, mandatory reporting obligations are not limited to the actions of staff, and the failure to disclose offence can also apply to alleged sexual activity by adult students.

Where a concern involves child abuse or other inappropriate behaviour allegedly perpetrated by a student, the School will comply with its mandatory reporting obligations, and may otherwise exercise its discretion to notify Queensland Police.

Subject to any Police clearance which may be required, the School will otherwise deal with student-on-student behavioural issues in accordance with its usual student management and discipline procedures.



## **Information provided to students**

Students are provided with age-appropriate information during class time and through school assemblies about what to do in response to an allegation of suspected child abuse and the need to promptly alert a member of staff if they believe that they, or a peer, is suffering from child abuse.

Information provided to students includes, but is not limited to:

- Remain calm.
- Promptly seek help and speak to a trusted staff member (including the Principal, a member of the School Executive Team, or a Student Safety Officer) about the concern.
- Remember this is not your fault, you are not to blame and are not in trouble.
- Tell the story in your own words, with as much detail as you can.
- Do not be afraid of saying the “wrong” thing.
- Listen carefully to any instructions you receive from staff (or if applicable, the Police or other authorities).
- Listen carefully to information you receive from staff about what will happen next (for example, and subject to the circumstances, authorities notified, parents informed, internal and/or external investigation).
- Be reassured that that you have done the right thing.

## **Records**

The School will make, keep and secure clear and contemporaneous records of any concerns raised in accordance with this policy, and the steps taken by the School to respond to those concerns.

## **Support**

The School will afford appropriate support to students the subject of, or otherwise connected to, concerns raised under this policy, particularly until the concern is resolved.

If a concern involves a student who identifies as Aboriginal or Torres Strait Islander, or is from a culturally and/or linguistically diverse background, has a disability or is otherwise vulnerable (including without limitation students who identify as LGBTIQ+, or are unable to live at home), steps will be taken to ensure that the student, and their family, is supported to understand the situation and are supported (including via the use of an interpreter where required).

The School will also provide appropriate support to staff who make mandatory reports under this policy, or who are assisting the School or families with the process outlined in this policy.

## **Cooperation with authorities**

The School will cooperate with any external authorities (including but not limited to Queensland Police, the Department of Families, Seniors, Disability Services and Child Safety-through Child Safety Services Centres, the Queensland Family and Child Commission and the Queensland College of Teachers) in relation to a concern or report (whether made under this policy or otherwise).

## **Confidentiality**

Appropriate confidentiality will be maintained at all times when dealing with concerns under this policy, with information only being provided to those who have a right or otherwise, on a “needs to know” basis.

## **Communication**

Where appropriate, the School will provide parents, carers and guardians with guidance and support where a student is the subject of a concern.

Staff do not require consent from a student’s parents before making a mandatory report in accordance with this policy. Similarly, staff are not required to disclose that a mandatory report has been made.

However, the School will keep families updated as it considers appropriate about the way in which it is dealing with concerns affecting that family’s child.

## **Victimisation is not tolerated**

The School will not tolerate victimisation towards someone because they have raised or participated in a process contemplated by this policy, including by raising a concern or making a mandatory report.

## **8 The School’s reporting obligations**

Schedule 1 sets out the main mandatory reporting obligations that apply to the School and its staff.

The School treats seriously its reporting obligations and recognises that student safety and wellbeing is everyone’s responsibility. Whilst the Principal, the School Executive Team and Student Safety Officers are primarily entrusted with day-to-day responsibility for ensuring that these reporting obligations are met, all staff and appropriate personnel are required to uphold the ethos of this policy by ensuring that student safety and wellbeing matters are reported internally, and externally where required.

Staff will receive training on their personal reporting obligations to achieve this.

- 2** Where a survivor has experienced child sexual abuse for which the School is responsible as an institution, the School is committed to providing that individual with appropriate and trauma-informed redress.

Whilst decisions about offers of redress will be dictated by the relevant circumstances, offers will ordinarily include one or more of a direct personal response, access to professional counselling and psychological care, and, where appropriate, financial compensation.

## **9 Communication and Implementation**

### **Communication**

This policy is made publicly available on the School’s website.

This policy is available to staff as part of the School’s and the Board’s internal policies and procedures. Aspects of (and updates to) the School’s student safety and wellbeing framework,

including this policy will be addressed in the School's professional development updates, training programs,

### **Implementation**

To properly implement this policy:

- (a) The Board and Principal will review this policy and the School's student safety and wellbeing practices at least every two years (or more frequently after a significant student safety and wellbeing incident) and implement improvements where applicable.
- (b) Families and the school community will be afforded the opportunity to contribute to the review and development of the School's student safety and wellbeing policies and practises (including this policy).
- (c) Periodic training and refresher sessions on this policy are provided to all staff.
- (d) The Principal is responsible for monitoring staff compliance with this policy. All staff must ensure that they abide by this policy and assist the School implementing this policy.
- (e) All staff must be familiar with and abide by this policy, and assist the School in the implementation of this policy.

## Schedule 1

### 1 Reporting a Child Abuse Offence: Failure to Report Offence

The *Criminal Code Act 1899* (Qld) makes it a crime to fail to report an abuse offence against a child.

As a result, anyone (and not just professionals who work with the School's students, or with children and young people generally) aged 18 or over must make a report to Queensland Police if they form a reasonable belief that an abuse offence has been committed against another person who was a child (under the age of 16 years, or a person with an impairment of the mind) at the time of the alleged offence.

A 'reasonable belief' or a 'belief on reasonable grounds' is not the same as having proof, but is more than suspicion, mere rumour or speculation. A 'reasonable belief' is formed if a reasonable person in the same position would have formed the belief on the same grounds. There must be some objective basis for the belief. For example, a 'reasonable belief' might be formed if:

- A student states that they have been sexually abused.
- A student states that they know someone who has been sexually abused (sometimes the student may be talking about themselves).
- Someone who knows a student states that the student has been sexually abused.
- Professional observations of the student's behaviour or development leads a professional to form a belief that the student has been sexually abused or is likely to be abused.
- Signs of abuse lead to a belief that the student has been sexually abused.

If you are not sure whether you have a reasonable belief, you must consult with the Principal, a member of the School Executive Team, a Student Safety Officer or the appropriate body to which a report must be made.

If you have formed a reasonable belief in relation to an abuse offence, you must immediately report the belief to Queensland Police by calling 000 in an emergency.

You must then make a further report on each occasion on which you become aware of any further reasonable grounds for the reasonable belief.

Please note that fulfilling the roles and responsibilities contained in this policy do not displace or discharge any other obligations that arise if you reasonably believe that a child is at risk of child abuse.

Failure to make a report without reasonable excuse is an offence under section 229BC of Schedule 1 the *Criminal Code Act 1899* (Qld).

However, it may not be an offence not to disclose an abuse offence against a child to Queensland Police if you have a reasonable excuse. You may have a reasonable excuse if you:

- Have a reasonable fear that disclosing the information would endanger the safety of any person (other than the alleged perpetrator of the child abuse offence).

- Believe on reasonable grounds that the information has already been reported to Queensland Police by another person or Queensland Police already have that information.

If there is uncertainty about the need for a report to Queensland Police (or another body) you should seek advice from the Principal, the School Executive Team or a Student Safety Officer about whether you are still required to make a report.

## 2 **Mandatory reporting**

Mandatory reporters (as defined below) have mandatory reporting obligations under the *Child Protection Act 1999* (Qld) (**CP Act**). Failure to make a mandatory report can constitute an offence under that Act.

A 'mandatory reporter' has the meaning given to a prescribed person by section 13E of the CP Act. It includes but is not limited to principals and teachers in any educational institution (including a kindergarten), registered or enrolled nurses, registered psychologists, persons who provide child care or child care services for fee or reward, persons concerned in the management of approved education and care services and any other person referred to in section 13F of the CP Act.

If you are a mandatory reporter, and in the course of your work, you know, or believe or suspect on reasonable grounds that a child:

- has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and
- may not have a parent able and willing to protect the child from the harm,

you must immediately make a report to the Department of Families, Seniors, Disability Services and Child Safety through the regional Child Safety Services Centre during business hours, or the Child Safety After Hours Service Centre on 1800 177 135 after hours. Additional reports must be made on each occasion where a mandatory reporter becomes aware of any further reasonable grounds for the belief or suspicion.

'Harm' as defined under the CP Act means sexual abuse or exploitation, or physical, psychological or emotional abuse or neglect. A 'child' is any person under 18 years of age.

Staff must check whether they are mandatory reporters.

A mandatory reporter must make a report even if a Student Safety Officer does not share their belief or suspicion that the report must be made. The School will afford support where appropriate to mandatory reporters who make a report under this policy.

Under section 13I of the CP Act, a relevant person is not required to give a report under section 13G until the person has formed a reportable suspicion about a child, and once a relevant person has formed a reportable suspicion about a child, the person must comply with section even though the person is taking, or has taken, other action in relation to the child.

## 3 **Reporting sexual abuse or likely sexual abuse**

Sections 366 and 366A of the *Education (General Provisions) Act 2006* (Qld) provide that if a staff member becomes aware, or reasonably suspects, in the course of the staff member's employment at the School, that a student attending the School has been sexually abused, or is likely to be sexually abused, the staff member must provide a written report to the Principal or a Board member. The Principal or Board member must provide a written report to police.

#### **4 Queensland College of Teachers**

Sections 76 and 77 of the *Education (Queensland College of Teachers) Act 2005* (Qld) require the School to notify the Queensland College of Teachers if it deals with an allegation of harm caused, or likely to be caused, to a child because of the conduct of a teacher, and notify the Queensland College of Teachers of the outcome of the dealing.

#### **5 Contacting Child Safety Services Centres**

Child Safety Services Centres may also be contacted where a staff member forms concerns about a student's wellbeing but a mandatory report is not required.

Examples of situations where contacting the Child Safety Services may be appropriate, but may not necessarily enliven mandatory reporting obligations, include:

- Significant parenting problems that may be affecting the student's development.
- Family conflict, including family breakdown.
- A family under pressure due to a family member's physical or mental illness, substance abuse, disability or bereavement.
- Young, isolated and/or unsupported families.
- Significant social or economic disadvantage that may adversely impact on a student's care or development.

Many cases will not fit neatly into these categories. For guidance about whether contacting the Child Safety Services Centres should be considered, staff can refer to the School's Student Safety Officers and information available on the Department of Families, Seniors, Disability Services and Child Safety website.

Child Safety may be contacted through the regional Child Safety Services Centre during business hours, or the Child Safety After Hours Service Centre on 1800 177 135 after hours.