

Child Risk Management

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1.0 Purpose

The Child Risk Management Procedure outlines the control measures employed by the University to protect children from harm when present at Griffith University campus or involved in activities conducted by Griffith University. It represents Griffith's annually reviewed risk management strategy, which is a requirement under the Working with Children (Risk Management and Screening) Act 2000 (the Act).

2.0 Scope

This Procedure applies to Griffith staff, students, volunteers, contractors and visitors who:

- participate in regulated child related work, as defined under the Working with Children (Risk Management and Screening) Act 2000 (the Act), during the course of their engagement with the University;
- engage with or undertake activities through Griffith with children, or
- partake in professional placements or integrated learning activities with children.

It also applies to Griffith personnel involved in the administration or management of persons in regulated child-related work (for example, students on placement or Student Ambassadors who visit schools), to the extent they are required to contribute to such administration or management.

3.0 Procedure

3.1 Risk Context and Assessment

As a higher education provider, Griffith primarily provides services to persons over 18 years of age. However, there are a range of circumstances where members of the University community interact with children. Therefore, there is an inherent risk of harm, abuse or exploitation of children within the organisation. Some of these circumstances are regulated activities under the Act and will require persons to hold a Blue Card as a legal requirement.

7	Activity or service (circumstance)
1	Providing childcare through one of the Griffith childcare centres.
2	Personnel interacting with children through visits to schools, campus tours with school groups and student recruitment events (including on-campus workshops and events for school aged children).
3	Personnel interacting with children work through health, counselling and support services provided to a person under the age of 18. For Griffith this includes support services such as course counselling, career counselling, international student support provided by staff, and course related health, counselling or support services.
4	Personnel undertaking regulated child-related work or interacting with children through special events, recreational events, excellence programs (including Young Conservatorium programs), co-curricular clubs or sporting events (including school holiday sporting programs).
5	Researchers working with children through research programs or activities.
6	Students entering work integrated learning or placements in a regulated business such as schools, childcare or health facilities.
7	Griffith personnel and homestay hosts who interact with international students who are under the age of 18 participating in homestay placement and English language pathways.
8	Teaching and other personnel working with children through a university enhanced studies program which typically involves school students between the ages of 15-17 undertaking course units in an undergraduate program.
9	Providing child accommodation including homestay. For Griffith this means where international students under the age of 18 are placed in a Griffith approved accommodation or homestay, the homestay provider and other people over the age of 18 residing in the home are in regulated employment.

In keeping with the University's policy commitments to child safety, the aim of this risk management procedure is to minimise the risk as far as is reasonably practical, while recognising that it cannot eliminate all risk entirely.

Generally, the strategy is to:

- make explicit University expectations for interactions with children through a specific Code of Conduct,
- require risk assessments to be undertaken at local activity level,
- ensure compliance with blue card requirements, and
- establish the role of Child Protection Officer.

3.2 Risk Control 1 – Child Risk Management Policy and Interacting with Children Code of Conduct

The Code of Conduct specifically addresses interaction with children and expected standards of behaviour. It provides clear guidelines for what is expected of people and consequences if they fail to

meet expectations, promoting a transparent and accountable environment for conducting activities involving children.

3.3 Risk Control 2 – Activity level Risk Assessments

Interactions with children and the types of regulated child-related work is varied across Griffith, therefore the strategies implemented to mitigate specific risks need to be primarily developed and implemented at a local level in University Elements (the Organising Element).

It is an expectation that Heads of Element will:

- ensure the early identification and timely risk assessment of activities, services or special events that involve interaction with children, using the Risk and Resilience Management Policy.
- develop and implement risk management plans, procedures and processes, specific to the activity, service or special event, that clearly addresses the risk of harm to children.

Where a risk is assessed as having a Medium (or above) rating, the relevant activity cannot proceed without the risk being further mitigated to Low level.

3.4 Risk Control 3 – Working with Children Checks

The blue card system, set out in the Working with Children (Risk Management and Screening) Act 2000 and administered by the [Queensland Government: Blue Card Services](#), determines a person's eligibility to work with children in Queensland based on a criminal history check and ongoing monitoring of police information. Griffith is required to comply with the requirements of the blue card system to the extent it is carrying on a regulated business and where personnel are undertaking regulated employment in Queensland.

3.4.1 Staff

Staff will be required to hold a blue card to be employed or appointed at Griffith when:

- appointed to be a member of University Council or as Vice Chancellor (as a person carrying on a regulated business)
- a role is identified as being in one of the 16 categories regulated employment as well as other circumstances where contact with children occurs.
- a role is identified as requiring Working with Children Checks as part of determining the fitness and propriety of a person under the Tertiary Education Quality and Standards Agency Act 2011 (the Act).

Note, Griffith teaching staff are exempt from requiring a Working with Children Check even if some of their students are under the age of 18.

As the determination of whether a blue card is necessary to perform a role depends on the varied day-to-day tasks involved at different Organising Elements, the responsibility sits within Organising Element and the person undertaking the recruitment exercise. Staff should utilise information provided by Blue Card Services and seek expert advice to determine when a blue card is required.

Identification of Working with children checks requirements

Continuing or fixed-term contract, short term contracts

The Organising Element hiring or contracting with a person on a continuing, fixed term, short term or volunteer arrangement, is responsible for identifying the need for a working with children

check (blue card) and request that a notice of the requirement be included in the request to recruit by HR

Researchers

The Research Supervisor is required to identify when a working with children check (blue card) is required for researchers

Homestay hosts

Refer to the Under 18 International Student Procedure.

Where the University identified that a staff member needs a valid Working with Children Check as being in a regulated employment position, the requirement will be contained as an inherent requirement in the position description and will be the responsibility of the staff member to obtain and maintain, with reimbursement of direct costs associated with obtaining a valid Working with Children Check provided by Griffith. Prospective employees who are required by law to hold a Blue Card (or equivalent in other States) must not commence work at the University until a valid Working with Children Check has been issued and provided (or an exemption applies).

Staff must ensure their blue card remains current and valid and are prohibited to work if their blue card becomes invalid.

3.4.2 Volunteers and Contractors

Volunteers or Contractors may be required to hold a valid blue card, depending on the environment where the work is performed, the type of work and the frequency at which it is performed.

The Organising Element is required to identify when a working with children check (blue card) is a requirement and must maintain appropriate records.

3.4.3 Disqualification Orders

Staff, students, volunteers or contractors who hold a valid Working with Children Check and are issued with a Disqualification Order issued by a court, or who are being investigated for, have been charged with or convicted of a Disqualifying Offence or Serious Offence, or who receive a negative notice or a change in police information, are prohibited from engaging in child related regulated employment or activities.

3.4.4 Blue Card Registers

Elements must work closely with HR to manage Working with Children Check processes for their services or activity (i.e., identification of roles), as appropriate. Additionally, all Queensland Blue Card records for Griffith Blue Card holders are to be recorded in the Element's **Blue Card Services Organisation Portal** and updated to ensure accurate records are maintained and that the University meets statutory notification obligations.

It is an expectation that Organising Elements understand and adhere to the Queensland Government Blue Card system and work closely with HR to manage blue card processes for their services or activity (i.e., identification, application and renewals) in Queensland, as appropriate.

3.4.5 Students

Students may be required to hold a valid blue card, depending on the professional requirements relevant to their course of study, particularly in relation to undertaking placements in health or education settings.

Organising Elements are required to identify when a working with children check (blue card) is a requirement of a course (due to professional placement or work integrated learning activity requirements) or a pre-requisite for employment in a professional field. If the course or employment field is a new offering, this will include consulting with or obtaining advice from

professional registration bodies and employment partners when determining if a blue card is required for placement activities. The Organising Elements must include the requirement in the course outline and ensure students have a working with children check (blue card) for relevant placements and a copy is retained on the student's central file.

3.5 Risk Control 4 – Child Protection Officer

The Deputy Registrar holds the position and responsibility of a Child Protection Officer. The Child Protection Officer will determine the next steps in the event of any suspected or disclosed child harm reported. This includes:

- determining whether the case meets the threshold of reporting to QPS and/or Child Safety and undertaking any necessary notification,
- considering whether the matter requires referral to Family and Child Connect or other relevant support service when there are concerns for the wellbeing of a child that does not meet the threshold for a report to QPS or Child Safety and it is believed that the child would benefit from support services,
- considering whether the matter requires management under Griffith disciplinary processes (if a Griffith staff or student is involved), and
- appointing a Child Protection Support Coordinator.

The Child Protection Support Coordinator will provide support relating to child protection generally by:

- offering assistance and support when a person at Griffith receives a disclosure of harm,
- organising external support to assist parties following a disclosure or suspicion of harm,
- engaging with the Office of Marketing & Communications, if required by the Child Protection Officer, if dealing with the media is required.

Griffith will provide appropriate training for these critical roles.

3.6 Risk Control 5 - Reporting harm or suspicion of harm

All members of the University community have a responsibility to respond when it is suspected that a child has been harmed or is at risk of harm.

If you believe a child is in immediate danger or a life-threatening situation, you must contact emergency services on triple zero (000) as soon as possible. All instances of suspected, disclosed or witnessed child harm arising from activities, services or special events conducted by the University, whether on campus or off-campus, must be reported to the Child Protection Officer as soon as possible.

See **Appendix 1** for further guidance on your internal and external reporting requirements.

3.7 Risk Control 6 – Record Keeping

The creation of complete and reliable records is an important aspect in ensuring the identification of abuse and appropriate response in instances of actual or alleged harm. The Queensland State Archives has released [Guidelines for creating and keeping records for the proactive protection of vulnerable persons](#) under the (Public Records Act 2002) which includes records relating to the safety and wellbeing of children. It requires that Griffith, where there is an identified level of risk, records evidence of interactions with children by public authorities which may provide corroborating evidence supporting current and future allegations and disclosures or incidents of child sexual abuse are documented and retained.

For further information, please contact the Information Management Lead, Digital Solutions (records-services@griffith.edu.au).

3.8 Risk Control 7 – Communication and Support for the Risk Management Strategy

This procedure will be accessible to all staff through publication in the Policy Library.

It will also be accessible to children, and parents of children, who take part in activities involving Griffith University, on request.

3.9 Monitoring and Review

Griffith University will review the effectiveness of its risk management strategy on an annual basis.

4.0 Roles, responsibilities and delegations

ROLE	RESPONSIBILITY
Deputy Registrar	Child Protection Officer
Child Protection Support Coordinator	See 3.5 above.

5.0 Definitions

For the purposes of this policy and related policy documents, the following definitions apply:

Act refers to the Working with Children (Risk Management and Screening) Act 2000

Blue Card means the card issued by the Queensland government once it has carried out a working with children check to see if a person is eligible to work in the areas of child-related work covered by the Act. If a person is eligible, they are issued a positive notice letter and a blue card.

Working with Children Check is a National check undertaken by the Queensland government to determine if a person is eligible to work in the areas of child-related work covered by the Working with Children (Risk Management and Screening) Act 2000 in Queensland.

Child in accordance with the United Nations Convention on the Rights of the Child, 'child' means every human being under the age of 18 unless under the law applicable to the child, majority is attained earlier. For the purposes of this Policy, a child is a person under the age of 18.

Disqualifying offence is an offence categorised as a 'disqualifying offence' under the Working with Children (Risk Management and Screening) Act 2000. If it is an offence of counselling, procuring, committing or attempting to commit as listed on the PSBA website and updated from time-to-time.

Regulated Employment refers to categories of employment in Schedule 1 of the Working with Children (Risk Management and Screening) Act 2000. This does not include all work where there is contact with children.

Volunteer is a member of the community who provides their services in a voluntary capacity to the University, not for financial reward but who may receive reimbursement for out of pocket expenses.

For advice and support contact policy@griffith.edu.au for Governance and Operational policy documents.

APPENDIX 1 - Reporting harm or suspicion of harm

All instances of suspected, disclosed or witnessed child harm arising from activities, services and/or special events conducted by the University, whether on campus or off-campus, must be reported to the Child Protection Officer as soon as possible.

External Reporting Requirements

Mandatory Reporting

It is recognised that some members of the University community have mandatory reporting requirements imposed by legislation. Individuals with mandatory reporting obligations have personal responsibility for fulfilling mandatory reporting requirements including providing a written report to Child Safety as stipulated by s13E of the Child Protection Act 1999 (Qld). All persons with mandatory reporting requirements are expected to be aware of their responsibilities in relation to child protection and the legal framework for sharing information about child protection concerns.

Students on Placements

If confronted with something that should be disclosed, the onus is on the student to make a disclosure to the host organisation where they are carrying out their placement. Individual sites have policy and procedures to follow, and, in some instances, mandatory reporting requirements will apply (i.e., ss365-366 of the Education (General Provisions) Act 2006 (Qld)). Students may also contact their course coordinator, clinical placement facilitator or liaison office for guidance.

Research

If a researcher discovers or suspects harm or a risk of harm to a child, mandatory reporting requirements may apply. Researchers must access the relevant legislation and be familiar with the specific requirements in each jurisdiction and can seek guidance from Research Ethics and Integrity.

DFAT Funded Research Partners

In accordance with the **DFAT Child Protection Policy 2017**, recipients and awardees under the Australia Awards program and DFAT grant recipients, including under the Australian NGO Cooperation Program (ANCP), Direct Aid Program (DAP) and Public Diplomacy programs are subject to additional reporting requirements. Any suspected or alleged case of child exploitation, abuse or policy non-compliance by anyone associated with DFAT-funded research in connection with official duties or business must be immediately reported to the DFAT Conduct and Ethics Unit.

6.0 Information

Title	Child Risk Management Procedure
Document number	2023/0001002
Purpose	The purpose of this Procedure is to strengthen Griffith's employment and operational practices and procedures to promote the protection and wellbeing of children who access or are involved in services or activities provided by Griffith.
Audience	Staff; Students; Public
Category	Operational
Subcategory	Risk Management
UN Sustainable Development Goals (SDGs)	This document aligns with Sustainable Development Goal/s: 8: Decent Work and Economic Growth
Approval date	12 April 2023
Effective date	12 April 2023
Review date	2024 (to be reviewed annually)
Policy advisor	General Counsel
Approving authority	Provost

7.0 Related Policy Documents and Supporting Documents

Legislation	Child Protection Act 1999 (Qld) Criminal Code 1899 Education and Care Services Act 2013 National Redress Scheme for Institutional Child Sexual Abuse Act 2018
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Public Records Act 2002
 Tertiary Education Quality and Standards Agency Act 2011
 Working with Children (Risk Management and Screening) Act 2000 (Qld)
 Working with Children (Risk Management and Screening) Regulation
 2011 (Qld)

Policy

Child Safety and Wellbeing Policy
 Code of Conduct
 Records Management Policy
 Risk and Resilience Management Policy
 Student Charter Framework
 Under 18 International Student Procedure

Procedure

N/A

Local Protocol

Griffith Child Care Protocols Documents
 Young Conservatorium Protocols
 GUEST Program Protocol

Forms

N/A
