

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 Risk Management Strategy

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 (see 3.4 for more detail).

ACTIVITY OR SERVICE (CIRCUMSTANCE)

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| 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 the GUESTS-At School 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. |
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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 **Enterprise Risk Management Framework**,
- 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.

As part of regular assurance activities, the Health Safety and Wellbeing team can request to see an Element's risk assessment.

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), or
- A role is identified as being in one of the 16 categories regulated employment set by the Act, or
- A Working with Children Check (Blue Card) is a requirement under other legislation, funding agreement or contract. For example, it may be required as part of determining the fitness and propriety of a person under the *Tertiary Education Quality and Standards Agency Act 2011* (Cth).

Note, Griffith teaching staff do not require a blue card even if some of their students are under the age of 18, as University teaching and learning activities are not captured within a category of regulated employment.

Teaching staff will only require a blue card when they perform specific activities that are captured by one of the regulated employment categories.

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**, the **Legal Services Blue Card Factsheet**, and if necessary seek advice from the **Compliance function** to determine when a blue card is required. However, if there is doubt about whether a blue card is required for a role, but the role will clearly require contact with children and young people under 18, the University's position is that blue card should be required.

IDENTIFICATION OF WORKING WITH CHILDREN CHECKS

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 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 blue card is required for researchers
Homestay hosts	Refer to the International Students Under the Age of 18 - Approved Accommodation Provider Selection and Monitoring

Where:

- a) the University identifies that a staff member needs a valid blue card, and
- b) the responsibilities that trigger the blue card requirements are ongoing,

the requirement must be contained as an inherent requirement in the position description.

It will be the responsibility of the staff member to obtain and maintain a valid blue card, with reimbursement of direct costs associated with obtaining a valid blue card to be provided by Griffith.

A “no card, no start” rule applies; 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 blue card:

- a. has been issued to the prospective employee, and
- b. the University has sighted the blue card and checked the photograph matches the prospective employee, and
- c. the person has been linked to an appropriate Griffith blue card online portal (see 3.4.4 below).

The same “no card, no start” rule applies when a current staff member is to undertake new duties that trigger the blue card requirements.

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. Staff should utilise information provided by [Blue Card Services](#), the [Legal Services Blue Card Factsheet](#), and if necessary seek [advice](#) from the [Compliance function](#) to determine when a blue card is required.

Note that blue cards will not be required when the person will be engaged for 7 days or less in a calendar year (but refer to the below section on restricted persons (3.4.3)).

The Organising Element is required to identify when a working with children check (blue card) is a requirement and must maintain appropriate records. The same “no card, no start” rules for staff (see above) apply to volunteers.

3.4.3 Restricted Persons

Restricted persons are a person who:

- has been issued a [negative notice](#)
- has a suspended blue card
- is a [disqualified person](#)
- has been charged with a [disqualifying offence](#) that has not been finalised, or
- is the subject of an adverse interstate Working with Children Check decision that is in effect.

Restricted persons cannot obtain a blue card to work in regulated employment and should be excluded from those activities by the University conducting blue card checks. Blue Card Services will notify Griffith of any current blue card holders linked to Griffith who become a restricted person. If that occurs, Griffith must immediately act to ensure the person is prohibited from continued engagement in the regulated employment activities. If the restricted person is a staff member, HR must be notified.

Restricted persons are also barred from working in circumstances where an exemption to blue card requirements would otherwise apply. These circumstances are referred to as ‘restricted employment’ and include:

- where a person will be engaged for 7 days or less in a calendar year,
- where the person is a volunteering parent of a child engaging in the activity, and
- where the person is under 18.

If an area in Griffith is not conducting blue card checks under these exemptions, they need to be conscious of the following:

- that Griffith must not allow a person to start or continue work in restricted employment when it knows, or ought reasonably to know, that the person is a restricted person,
 - that restricted persons will be committing a serious offence if they work in restricted employment.
- This may or may not deter them from seeking to do so.

As there is a risk of engaging a restricted person (without Griffith having knowledge of their status), due care should be exercised in these circumstances. The safest option is to ignore the availability of these exemptions and require that persons obtain a blue card.

3.4.4 Blue Card Registers

Listed in **Schedule 1** of this procedures are the Organisational Portals that have been established by Griffith using the Blue Card Services online system. These portals are where all current blue card holders engaged by the University (as staff, students, or volunteers) must be included and kept up to date. If one of the below portals is not suitable, you must obtain the approval of the Provost prior to creating a new portal. This ensures that the University has oversight and can monitor and audit the use of University portals and ensure that statutory obligations are being met.

Elements must establish and maintain appropriate processes to ensure that:

- Blue card holders are linked to an appropriate Griffith portal when the person is engaged with the University and their identity has been verified, and
- Blue card holders are de-linked from the portal when their enrolment, employment or engagement with the University ceases.

Elements must ensure that staff are appointed and trained to administer the above processes. Blue Card Services have materials available online to support using their online system.

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 2023*) 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.

The Health, Safety and Wellbeing team will provide assurance about risk assessments being conducted by local areas, and blue card checks for staff and volunteers, in accordance with the Managing Health, Safety and Wellbeing Assurance Activities Standard.

4.0 Roles, Responsibilities and Delegations

ROLE	RESPONSIBILITY
Deputy Registrar	Child Protection Officer
Child Protection Support Coordinator	See 3.5 above.
Associate Director, H&S Standards and Assurance	Provide assurance about risk assessments being conducted by local areas, and blue card checks for staff and volunteers, in accordance with the Managing Health, Safety and Wellbeing Assurance Activities Standard.
Executive Group Members	For Blue Card Portals where they are the Accountable Executive (see Schedule 1) ensure that processes are established and maintained to keep the portals up to date and accurate, including by having appropriate resources in place.

5.0 Definitions

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 offense 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 (<https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/eligible/disqualifying-offences>)

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 received reimbursement for out of pocket expenses.

6.0 Information

Title	Child Risk Management Procedure
Document number	2024/0001053
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
Category	Operational
Subcategory	Safety
UN Sustainable Development Goals (SDGs)	This document aligns with Sustainable Development Goal/s:
Approval date	15 April 2024
Effective date	15 April 2024
Review date	2025
Policy advisor	General Counsel
Approving authority	Provost

6.0 Related Policy Documents and Supporting Documents

Legislation	<i>Child Protection Act 1999 (Qld)</i> <i>Criminal Code 1899</i> <i>Education and Care Services Act 2013</i> <i>National Redress Scheme for Institutional Child Sexual Abuse Act 2018</i> <i>Public Records Act 2023 (Qld)</i>
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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 Enterprise Risk Management Framework Information Management Policy Student Charter Under 18 International Student Policy Griffith Health Intramural Professional Practice Policy
Procedures	Pre-Employment Screening Procedure Information for Griffith University Students undertaking Professional Practice and other Activities which may come within the ambit of the <i>Working with Children (Risk Management and Screening) Act 2000 (Qld)</i> Private Practice Guidelines to Conduct Clinical Practice within the Griffith Health Clinics Managing Health, Safety and Wellbeing Assurance Activities Standard
Local Protocol	Griffith Child Care Protocols Documents Young Conservatorium Protocols GUEST Program Protocol
Forms	N/A

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 to Police where Child Sexual Abuse is Suspected

Under the *Criminal Code 1899* (Qld) any adult who has reasonable grounds to believe that a child sexual offence is being committed against a child must report the matter to police as soon as is reasonably practicable. Failure to do so is a criminal offence. See this Qld government [website](#) for more information.

Mandatory Reporting to Qld Dept of Child Services

Some members of the University community have mandatory reporting requirements under the *Child Protection Act 1999* (Qld) when physical or sexual abuse of a child is suspected. This includes anyone who is a:

- doctor
- registered nurse
- teacher, or
- childcare professional

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.

SCHEDULE 1 – List of Approved Griffith Blue Card Portals

BLUE CARD PORTAL NAME	APPROPRIATE FOR	CONTACT PERSON/S	ACCOUNTABLE EXECUTIVE
Griffith Business School	Staff or volunteers within GBS	Student Development Coordinator j.fairclough@griffith.edu.au (07) 373 56558	PVC, Business
Griffith University Arts Education and Law Group	Staff or volunteers within Arts, Education and Law	Open Conservatorium Administrators open-conservatorium@griffith.edu.au	PVC, Arts, Education and Law
Griffith University School of Education and Professional Studies	Students needing a blue card for placements within the School	School Manager, Education and Professional Studies richard.f.smith@griffith.edu.au (07) 555 28621	PVC, Arts, Education and Law
Griffith University Sciences Group	Staff or volunteers within Sciences Group	Manager, Griffith Sciences Partnerships Office d.khokhar@griffith.edu.au (07) 373 57022	PVC, Science
Griffith University Health Group	Staff, volunteers or students within Health Group	Team Leader, Health Placement Support Hub meg.lindley@griffith.edu.au (07) 555 29493 Manager, Placements Support Hub Team jenny.richards@griffith.edu.au (07) 555 27234	PVC, Health
Griffith International	Staff or volunteers within Griffith International	Senior Executive Officer r.beauchamp@griffith.edu.au (07) 555 28696	VP, Global
Griffith Sport	Staff or volunteers within Griffith Sport	Compliance and Service Improvement Manager d.mether@griffith.edu.au (07) 373 58530	Chief Operating Officer

BLUE CARD PORTAL NAME	APPROPRIATE FOR	CONTACT PERSON/S	ACCOUNTABLE EXECUTIVE
Griffith University Accommodation	Staff or volunteers with Campus Life Accommodation	Operations Coordinator c.mckenzie@griffith.edu.au (07) 373 57889	Chief Operating Officer
Griffith University – GUMURRII	Staff or volunteers within the DVC-IDI portfolio	Senior Executive Officer l.adams@griffith.edu.au (07) 373 57145	DVC, Indigenous
Griffith University Marketing and Communications	Staff or volunteers within Marketing and Communications	Administration Officer marie.gervais@griffith.edu.au	VP, Marketing and Communications
Griffith University – Student Associations	Staff and volunteers working with the Campus Life Student Associations unit	Student Associations Manager c.everdell@griffith.edu.au (07) 373 54821	Chief Operating Officer
Griffith University – Student Connect	Students who require a blue card for placements (other than in Health and School of Education)	Manager, Student Connect j.clifford@griffith.edu.au (07) 555 28815	DVC, Education
Griffith University Child Care	Staff, volunteers and contractors to the Child Care Facilities	Director, Child Care r.simpkins@griffith.edu.au (07) 373 55353	Chief Operating Officer
Griffith University Council	Council Members	Executive Officer k.sledge@griffith.edu.au (07) 373 58502	Chief Operating Officer
Griffith University – Student Life	Staff or volunteers within Student Life (other than Student Connect)	Director, Health Counselling and Wellbeing emma.morgan@griffith.edu.au (07) 555 27148	DVC, Education