QCEC
QUEENSLAND CATHOLIC EDUCATION COMMISSION

Student Protection Guidelines

for Queensland Catholic School Authorities

December 2023

Contents

Preface 3

1 Understanding abuse and harm 3

1.1. Sources of abuse and harm 3

2 Types of Abuse 4

2.1 Sexual Abuse and Likely Sexual Abuse 4

2.2 Physical abuse 7

2.3 Emotional/Psychological Abuse 7

2.4 Neglect 8

3 Significant Harm 8

3.1 What is "unacceptable risk" of harm? 9

3.2 Relationship between abuse and harm 9

4 Recognising Abuse and Harm 9

4.1 Recognising the signs of abuse and harm 9

4.2 Identifying the signs of Abuse and Harm 10

5 Forming a reasonable suspicion 11

5.1 Responding to a disclosure 12

6 Considering whether there is a parent able and willing to protect a student 13

7 Responsibilities Under the *Criminal Code Act 1899* 14

8 Confidentiality, Record Keeping and Information Sharing 14

8.1 Will a student's family know I have made a report? 15

8.2 Information Sharing 15

9 Support and Referral Services 15

9.1 Family and Child Connect 15

9.2 Intensive Family Support Services 16

9.3 Other referral options 16

9.4 School based supports 16

10 Understanding behaviour by a staff member a student considers to be inappropriate 16

10.1 Examples of boundary violations* 18

11 National Response Protocol 19

12 Historical Allegations 19

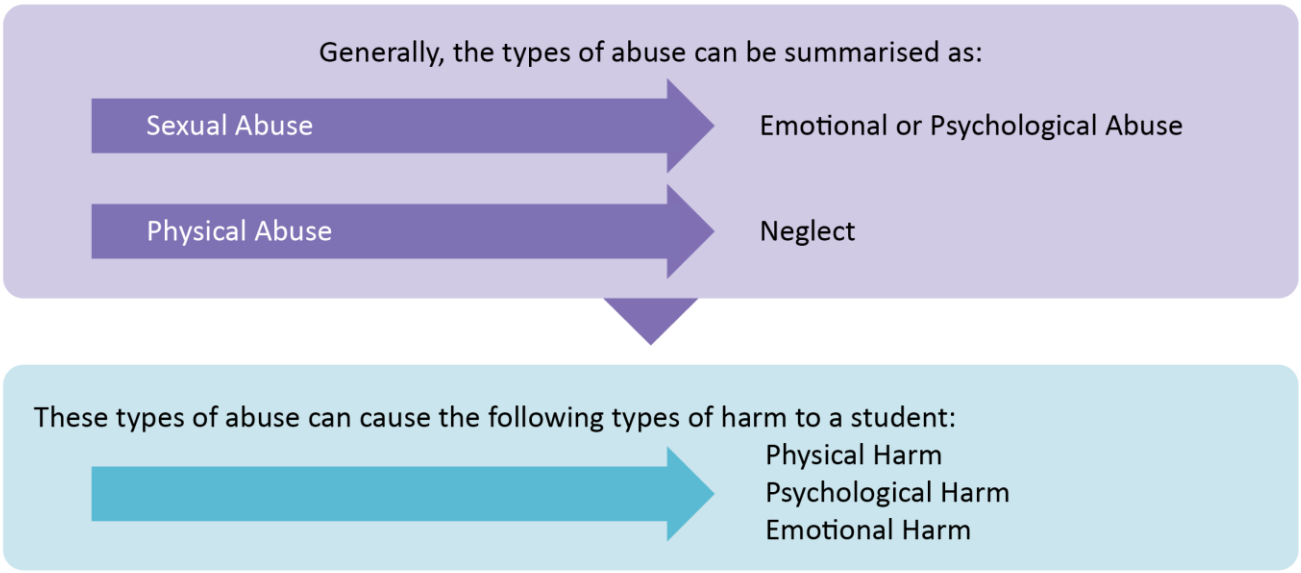
Preface

These guidelines have been developed by the *Queensland Catholic Education Commission* (QCEC) in conjunction with Catholic School Authorities in order to provide information to support the implementation of the *Student Protection Processes for Queensland Catholic Schools*. These guidelines may be subject to change in line with child protection practice developments and may be subject to customisation to reflect the resources and systems in place for a particular Catholic School Authority.

1. Understanding abuse and harm

All children have the right to be safe in environments free from abuse and harm. Where this is not the case, adults have a responsibility to act. This part explains the key concepts that underpin the processes for ensuring the safety of students, in order to inform the actions staff members must take if they form a reasonable suspicion of abuse, harm or staff inappropriate behaviour towards a student.

As a first step, it is important that staff members have an understanding of what is meant by the terms 'abuse' and 'harm'.



Sources of abuse and harm

Students can be abused, or experience harm from a number of sources. These include:

Person associated with the school *(Staff member, Volunteer or another student at the school)*	Family Member/Relative of the student *(Parent/Carer, Sibling, Grandparent, other relative)*
Other person in the community *(Family friend, neighbour, coach, tutor, stranger)*	Self-harming by a student

2. Types of Abuse

2.1 Sexual Abuse and Likely Sexual Abuse

Sexual abuse of a student occurs when a person engages in sexual behaviour with a student, and:
The other person bribes, coerces, exploits, threatens or is violent toward the relevant person; and/or
The student has less power than the other person; and/or
There is a significant disparity between the student and the other person in intellectual capacity or maturity.[1]

Characteristics of a power imbalance include: significant differences in age, developmental ability, authority, influence or some kind of control over the student.

Likely sexual abuse is where it is more probable than not that a student will be sexually abused in the future. One situation where a reasonable suspicion of likely sexual abuse could be formed is where 'grooming' behaviour towards a student is identified.

IMPORTANT NOTE: Sexual Activity between staff members and students

The involvement of any staff member or volunteer within a school in sexual activity with, or sexual exploitation of, a student attending that school is always to be regarded as sexual abuse.

2.1.1 What does sexual abuse involve?

Sexual abuse involves an imbalance of power between a student and the other person. The imbalance of power allows force, trickery, emotional bribery, blackmail or emotional pressures to be used against the student to involve him/her in sexual activity or to sexually exploit him/her. Secrecy, the misuse of power and distortion of adult -child relationships may also be involved.

Sexual abuse involving physical contact with a student could include:
Touching, kissing, holding or fondling a student's body in a sexual manner;
Touching, kissing or fondling a student's genital area'
Engaging in or attempting to engage in vaginal or anal intercourse with a student;
Penetrating or attempting to penetrate a student's vagina or anus with a finger or other object;
Engaging in or attempting to engage in oral sex with a student; or
Engaging in or attempting to engage in masturbation with a student.

It does not matter whether the student is clothed or unclothed whilst sexual abuse involving physical contact takes place. Engagement of a student in sexual acts by duress or through inducements of any kind is considered sexual abuse.

Sexual abuse/likely sexual abuse of a student may not necessarily involve physical contact. It could, for example, involve behaviour that occurs in the student's direct presence or that occurs indirectly including through electronic communications. Examples include:
Exposing a sexual body part to a student;
Requesting a student to expose a sexual body part;
Making obscene or sexually explicit remarks to a student;
Sending obscene or sexually explicit material to a student;
Blatant or persistent intrusion into a student's physical privacy;
Voyeurism – covertly observing intimate behaviour that is normally private;

[1] See section 364 of the *Education (General Provisions) Act 2006*

Exposing a student to pornographic films, photographs, magazines or other material;
Having a student pose or perform in a sexually explicit manner;
Exposing a student to a sexual act;
Forcing a student to witness a sexual act; or
Communicating with a student in a sexually intrusive way.

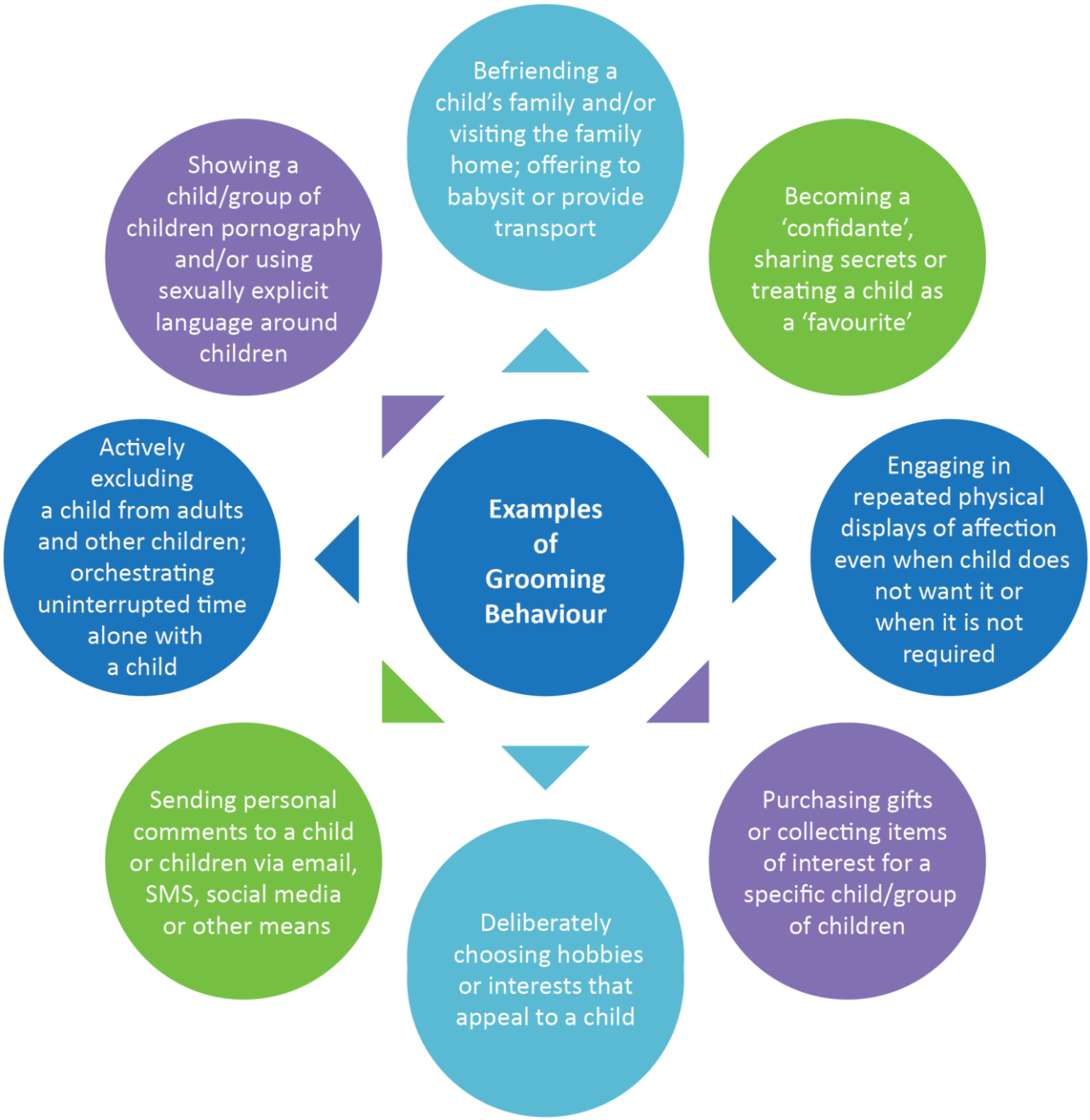
2.1.2 What is grooming?

Sexual offending against a child is rarely a random act by a stranger. It is commonly based on a relationship with the child that has been formed over time. The abuse is commonly well thought out and planned in advance. Offenders may often take time to 'groom' their victim, often over a lengthy period. They will also often 'groom' the child's parents, care-providers or others who might otherwise protect them from the abuse. This occurs so that the child and his/her parents or care-providers will trust the offender and not suspect any intended wrongdoing.

The establishment of a relationship of trust which is then misused is often very confusing and damaging to the child, who may not even immediately recognise what is happening to them as abuse. Grooming behaviour is unlikely to be recognised when observed as a one-off event, but a pattern of grooming of the intended victim and/or the intended victim's parents or care-providers is likely to be recognised. Grooming will tend to develop in intensity over time. It will also tend to include elements of secrecy and concealment. It is important to be aware of the types of behaviours that can be used in the process of grooming a child or young person, while remembering that some of the behaviours might equally reflect normal interactions based on genuine motives of care and concern. This is the reason that, for staff members, the observance of clear professional boundaries and transparency in the declaration of potential conflicts of interest is a vital part of the protection of children and of the professional integrity of staff members themselves.

Recognition of the grooming process that is used as a preparation for the sexual abuse of a child is an indicator of likely sexual abuse.

Some examples of 'grooming' behaviour could include:



Activity between peers

Sexual activity between students

It is important to note that activity between peers may also be considered abusive, especially if the relationship is coercive or the behaviour forceful, degrading or threatening. Sexual activity between young people under 16 years of age is not automatically considered to be sexual abuse, even though technically it is unlawful in Queensland. The dynamics and characteristics of the sexual activity is a key consideration. For example, if a young person under the age of 16 years engages in sexual activity with a peer and there is no imbalance of power, coercion or manipulation involved, this may not be considered sexual abuse. On the other hand, if there is a power imbalance, coercion or manipulation in the sexual activity between a young person 16 years and older and another person, this may be considered sexual abuse.

IMPORTANT NOTE: Sexual activity between students or peers where one party is 18 years or older and the other under the age of 16 years is a child sexual offence

Under s229BC of the *Criminal Code Act 1899*, adults are required to report a child sexual offence to the Queensland Police Service unless it has been reported under the EGPA or the CPA (see *Student Protection Processes for Queensland Catholic School Authorities*).

Student sexual behaviour

Suspicions that a student has been sexually abused may also be formed in some cases where a student exhibits concerning sexual behaviour. Resources such as those published by the Department responsible for Child Safety can assist in identifying age inappropriate sexual behaviour, and section 4.2 details further signs of sexual abuse.

2.2 Physical abuse

Physical abuse *refers to non-accidental use of physical force against a child by another person that results in significant harm to the child.*

2.2.1 What does physical abuse involve?

Examples of physical abuse include but are not limited to hitting, shaking, throwing, burning, biting, poisoning and female genital mutilation. The definition of physically abusive behaviour extends to the fabrication, exaggeration and inducing of illness symptoms in a child.

A person does not have to intend to physically harm a child to have physically abused them (for example, physical punishment that results in bruising or fractures would generally be considered physical abuse). Physical abuse does not always leave visible marks or injuries. Physical abuse can result in significant physical harm (for example, fractures, burns or bruises) and/or emotional/psychological harm (for example, hyper vigilance, depression or persistent state of fear and anxiety) to a child.

When considering if a child is at unacceptable risk of suffering harm caused by physical abuse by a person, a range of factors are considered. Examples include:
The person's propensity towards violence;
The degree of control a person has over their own behaviour or the behaviour of others;
The physical force used; and
The ability and willingness of another adult to act protectively to prevent the physical abuse.

Examples of situations which give rise to an unacceptable risk of physical abuse include, though are not limited to:
Domestic violence involving the throwing of objects; or
Situations in which a baby is shaken but not obviously injured.

2.3 Emotional/Psychological Abuse

Emotional or psychological abuse *is the persistent emotional ill-treatment of a child which causes severe and persistent adverse effects on a child's emotional development.*

2.3.1 What does emotional or psychological abuse involve?

Examples of emotional abuse include but are not limited to constant criticism, public humiliation, belittling, constant yelling, withholding praise and affection, excessive teasing, scape-goating, rejection, hostility, exposure of a child to domestic and family violence and conveying that a child is worthless or unloved, inadequate or valued only insofar as the child meets the needs of another person.

Emotional or psychological abuse may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of reasonable exploration and learning or preventing the child from participating in normal social interaction. Emotional abuse can result in significant harm to a child, for example, it can result in significant emotional/psychological harm such as depression, attachment disorders, chronic feeling of fear/anxiety or self-harm.

A child is considered to be at unacceptable risk of suffering harm caused by emotional abuse in a number of situations for example the frequent, chronic and entrenched verbal criticisms and hostility directed at the child by another person.

2.4 Neglect

Neglect *is the persistent failure to provide for a child's basic physical and emotional necessities of life such that the child's health and development are affected.*

2.4.1 What does neglect involve?

Neglect is the persistent failure to provide for a child's basic physical and emotional necessities of life such that the child's health and development are affected. Basic needs include: food, housing, adequate clothing; personal hygiene and hygienic living conditions; health care, including the timely provision of medical treatment and dental care; and adequate supervision and protection needed for the child's optimal growth and development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Neglect can result in a significant impact on a child's physical, emotional and psychological wellbeing. It can result in significant physical harm such as serious injury or death. For example, failure to supervise a child may result in a child ingesting poison or getting seriously injured or getting burnt. Neglect can also result in serious emotional/psychological harm such as attachment disorders, failure to thrive in infants and significant developmental delays.

A child is considered to be at unacceptable risk of neglect in situations such as severe or chronic substance misuse, significant mental illness, lack of parenting skills and addiction to gambling by the child's primary parent or care-provider inhibiting their capacity to provide sufficient care.

More information around understanding child abuse and harm can be found on the Department responsible for Child Safety website.

3. Significant Harm

Harm can be caused by physical, psychological or emotional abuse, sexual abuse or neglect. Harm refers to the detrimental effect or impact of abuse/neglect on a child. For statutory intervention to occur, there must be information to suggest:
That the child has suffered, is suffering or is at any unacceptable risk of suffering significant harm; and
There may not be a parent able and willing to protect the child from harm.

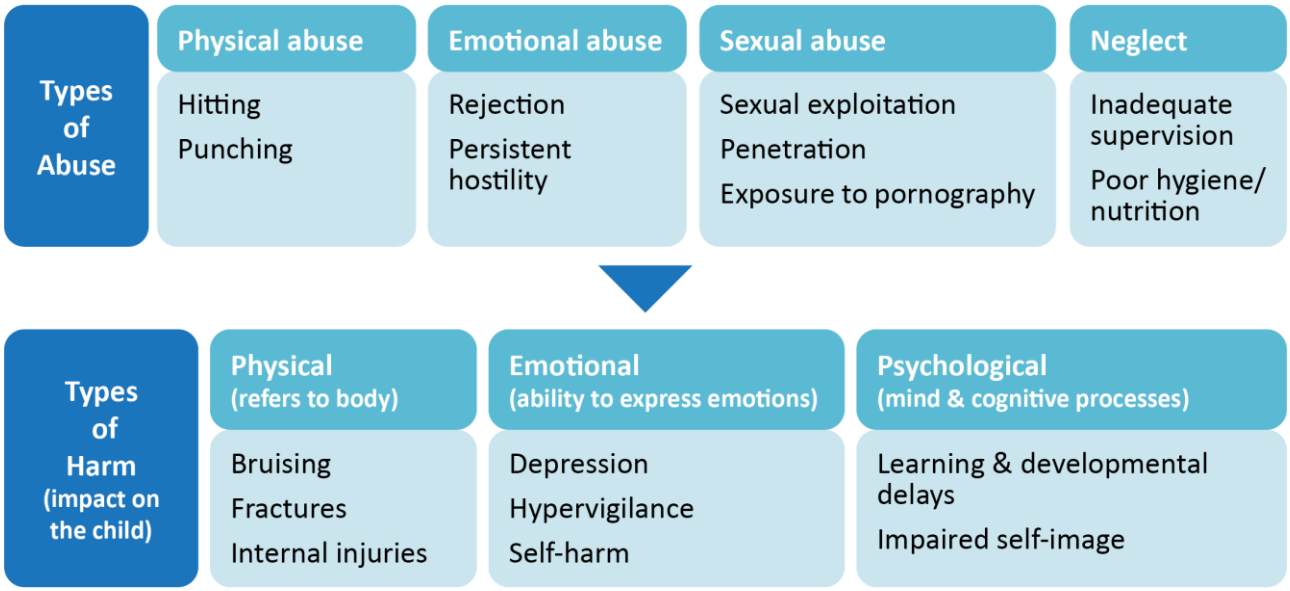
Harm can be caused by a single act, omission or circumstance or a series or combination of acts, omissions, or circumstances. This series or combination of acts, omissions or circumstances is often referred to as "cumulative harm".

3.1 What is "unacceptable risk" of harm?

A child is considered to be at unacceptable risk of suffering harm if there are grounds to suspect that unless someone intervenes to prevent it, the actions of a person will result in, or is likely to result, in a detrimental effect of a significant nature on the child's physical, emotional and/or psychological well-being.

3.2 Relationship between abuse and harm

In essence, abuse is the action towards a student, and harm is the impact of that action on the child. Children can experience multiple types of abuse, which in turn can cause multiple types of harm.



4. Recognising Abuse and Harm

4.1 Recognising the signs of abuse and harm

There are many signs that might lead staff members to have concerns about a student. It is important to keep an open mind when encountering these signs, as their presence does not necessarily mean that the student is experiencing harm caused by abuse and/or neglect. However, they may identify concerns for a student and indicate that further consideration and monitoring is the appropriate response.

It is important to remember:

- The signs are generally more significant if they are severe, form a pattern, and/or show frequency;
- The younger the child involved, the greater the risk;
- All factors need to be considered including the child's circumstances and family context.

4.2 Identifying the signs of Abuse and Harm

4.2.1 Observations of student behaviour

In general terms, something may be wrong if you observe student behaviour such as:

- Nervousness/withdrawal;
- Passivity/excessive compliance;
- Evidence of deterioration in peer relationships and/or generally poor peer relationships;
- Trouble concentrating at school/unexpected drop in school academic performance;
- Frequent absences from school without substantiated or acceptable explanations;
- Being extremely aggressive, stealing or running away;
- Evidence of extreme or continually aroused emotional states;
- Out of character behaviour;
- Behaviour that is not age appropriate or typical of peer behaviour;
- In younger students: separation anxiety, changed eating patterns;
- In older students: drug/alcohol use, sexual promiscuity, self-harm or reckless and risk-taking behaviour.

In relation to possible harm or risk of harm to a student that may be a result of sexual, physical or emotional abuse and/or neglect you may observe the following:

4.2.2 Physical

Bruises or lacerations, especially on face, head and neck;
Burns/scalds;
Multiple injuries or bruises, especially over time;
Fractures, dislocations, twisting injuries;
Explanations offered by the child not consistent with the injury or the injury is unable to be explained by the child;
A child hiding injuries;
Repeated injuries with a recurring or similar explanation.

4.2.3 Neglect

Delay in achieving developmental milestones;
Medical or therapeutic needs not attended to;
Poor personal hygiene leading to social isolation;
Scavenging for/stealing food; lack of adequate school lunches;
Extreme seeking of adult affection;
Flat and superficial way of relating.

4.2.4 Domestic violence

Difficulties in eating and sleeping;
Hyper vigilance;
Regression to age-inappropriate behaviours;
Developmental delays;
Child is over-protective of a parent;
Excessively controlling or aggressive/violent behaviour;
Abuse of siblings/parent.

4.2.5 Emotional/psychological

Inability to value self and others;
Lack of trust in people;
Statements from the child e.g. “I’m bad; I was born bad”;
Extreme attention seeking behaviours.

4.2.6 Sexual

Direct or indirect disclosures of abuse;
Concerning sexual behaviour and/or age-inappropriate sexual knowledge;
Use of threats, coercion or bribery to force other children into sexual acts;
Sexual themes/fears expressed in artwork, written work or play;
Repeated urinary tract infections, especially in younger girls;
Physical trauma to buttocks, breasts, genitals, lower abdomen, thighs;
Unexplained accumulation of money/gifts;
Presence of sexually-transmitted infections, especially in younger children.

More information around recognising the signs of abuse can be found on the Department responsible for Child Safety website.

5. Forming a reasonable suspicion

A reasonable suspicion of abuse or harm is a suspicion that would be formed by a reasonable person based on a reasonable view of the evidence available to them. In other words, a reasonable suspicion is an objectively justifiable suspicion that is based on specific facts or circumstances. When a reasonable suspicion is formed, a staff member must act in accordance with the processes outlined in this document.

Generally, the ways in which a staff member may form a reasonable suspicion are as follows:
A student makes a direct disclosure about another person's behaviour (see Section 5.1);
A parent or any person reports information of concern about a student and/or another person's behaviour (this information may come from another student, relative, friend, acquaintance of the student, or sometimes could be anonymous);
Direct observation of abusive or inappropriate behaviour towards a student;
Relevant observations (appearance, behaviours, and situations) are witnessed, or other relevant firsthand knowledge is gained.

Additionally, section 13C of the *Child Protection Act 1999* offers some guidance around forming a reasonable suspicion that a student has suffered, is suffering or is at unacceptable risk of suffering significant harm:
Whether there are detrimental effects on a child's body or psychological/emotional state, or are likely to become so in the future;
The nature and severity of the detrimental effects and the likelihood that they will continue;
The age of the child.

A staff member may **confer** with an appropriate colleague, being [specified staff positions] as part of the decision-making process as to whether they have formed a reasonable suspicion – further detail around conferral processes can be found in the Student Protection Processes. The staff member must never confer with the person who is or potentially is the source of the concern.

It should be noted that at times information may come to a staff member's attention indirectly (e.g. perhaps third hand). In these cases, the following should be considered:
It is not the role of the staff member or of the school to investigate, confirm or substantiate the validity of the information;
In some cases, it may be appropriate to seek additional information to clarify the situation, to the extent necessary to determine any action that may be required under these processes;
If the information received gives rise to a staff member forming a reasonable suspicion of harm to a student resulting from abuse or neglect, from any source, the staff member must follow the relevant reporting requirements described in the [Student Protection Processes for Queensland Catholic Schools].

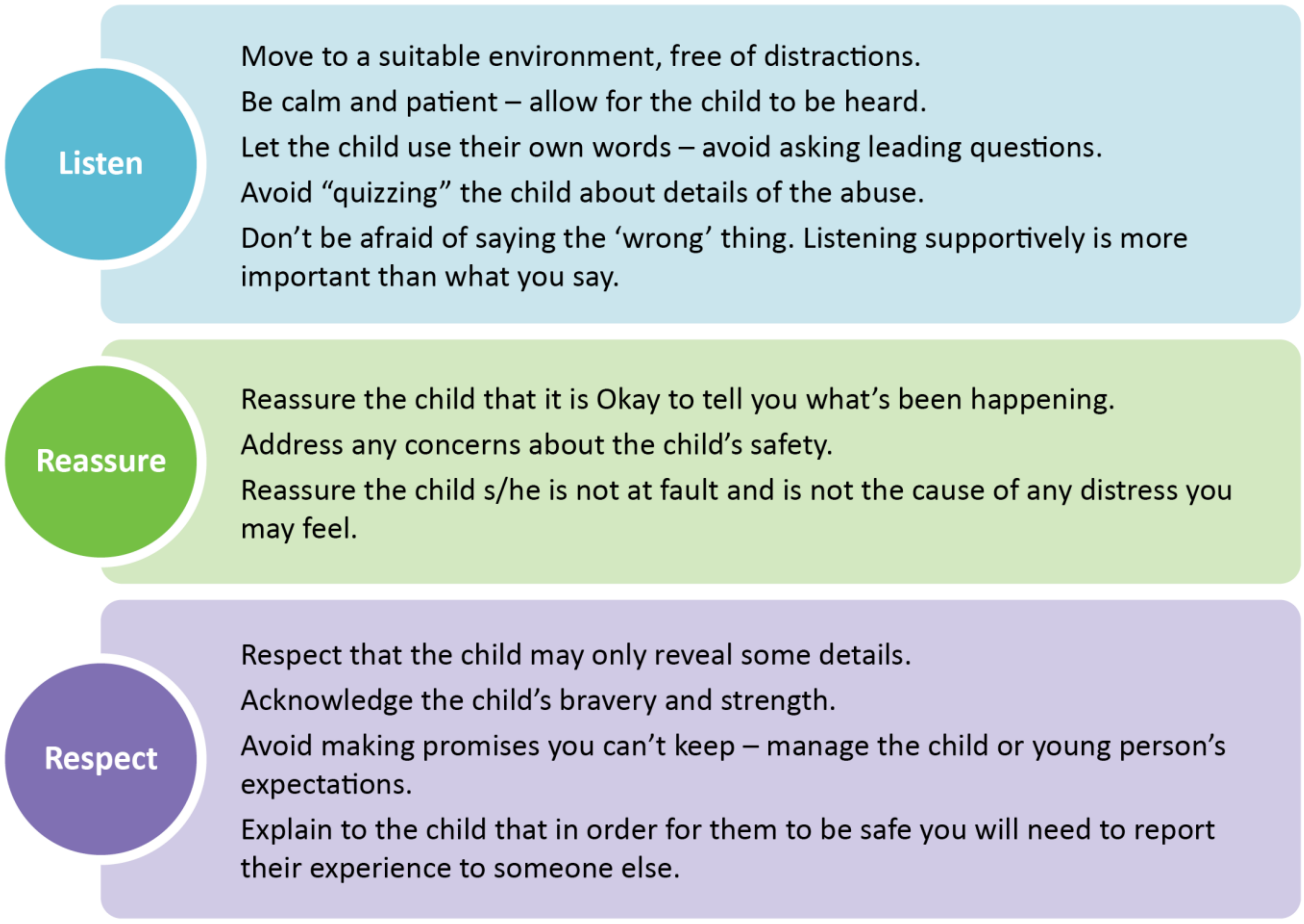
If the information received by the staff member suggests inappropriate behaviour by a staff member towards a student, then the staff member must follow the relevant reporting requirements described in the [*Student Protection Processes for Queensland Catholic Schools*].

NOTE: Staff members must not photograph student injuries or audio/video record the discussion with the student – this is the role of Police.

Details about how the information came to the staff member's attention should be included in any report made under these processes.

5.1 Responding to a disclosure

Staff members in schools are often the first people a student may tell when they are feeling unsafe, therefore it is important for staff members to be aware of how children/young people disclose and how to respond in the most appropriate manner. If a student tells a staff member about being abused or harmed:



Adapted from an AIFS infographic: Responding to children and young people's disclosure of abuse

Remember – it is not a school staff member's role to investigate a suspicion of an unacceptable risk of abuse/harm from any source, rather to report a reasonable suspicion of abuse or harm in accordance with the student protection processes. It is the role of officers of Queensland Police Service and qualified officers of the Department responsible for Child Safety to investigate and collect evidence in the required circumstances, such as conducting interviews with students.

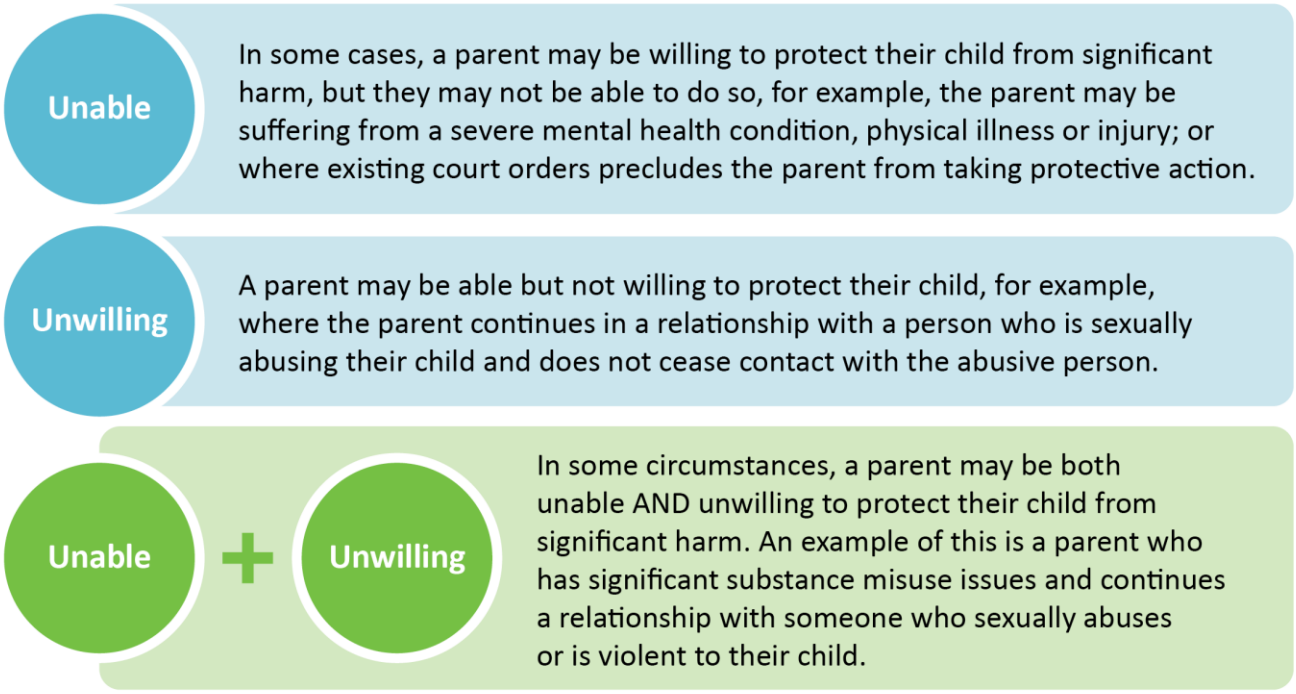
Only ask enough questions to help you decide whether you have honest and reasonable grounds to form a suspicion of harm/abuse or an unacceptable risk of harm/abuse. Be aware that any questioning beyond this could cause distress and confusion and could interfere with the integrity of any subsequent investigation undertaken by relevant authorities.
As soon as possible after the disclosure, make detailed relevant notes about any signs, disclosures, injuries, and behaviours that caused you to be concerned for the student's safety or wellbeing.

Any response must be focussed on the best interests of the student. As such, the immediate support needs of a student are the priority and staff members must act promptly to raise the concerns with the Principal.

6. Considering whether there is a parent able and willing to protect a student

Where there is no parent able and willing to protect a child from significant harm, then the Department responsible for Child Safety intervenes to ensure the safety of the child. This is therefore an important consideration when determining if a matter should be reported to the Department responsible for Child Safety.

A parent must be able AND willing to protect the child from significant harm.



In some cases, parents will seek to minimise or reduce the significance of harm suffered by a child (or that the child is at risk of suffering) and this may indicate the parent may not be able and willing to protect the child from harm. For example, this includes a parent minimising serious self-harming behaviours exhibited by their child or failing to recognise the serious and/or long-term impacts of a child's medical needs or significant developmental delays.

Forming a reasonable suspicion around whether a parent may be able and willing is based on a number of factors, including:
The observations and knowledge the Principal and staff members may have of the family circumstances;
Disclosures made by a child;
Information provided by another person.

A staff member is not expected to conduct an investigation to ascertain if a parent is able and willing to act protectively, rather must act on the information available to them. Staff members may confer with colleagues to assist in their decision making.

NOTE: If a reasonable suspicion of sexual abuse or likely sexual abuse is formed a report to the Queensland Police Service is to be made even if there is a parent able and willing to protect the child from harm.

7. Responsibilities Under the *Criminal Code Act 1899*

Under section 229BC of the *Criminal Code Act 1899*, an adult who gains information that causes the adult to believe on reasonable grounds, or ought reasonably to cause the adult to believe, that a child sexual offence is being or has been committed against a child by another adult and at the relevant time the child is or was under 16 years or a person with an impairment of the mind, must report the matter to the Queensland Police Service.

Non-abusive sexual relationships in the following circumstances may fall outside of the mandatory responsibilities of teachers to report sexual abuse under the *Child Protection Act 1999* and staff members to report sexual abuse under the *Education (General Provisions) Act 2006*, but must be reported under the Criminal Code.

Student (18 years or older) commits a child sexual offence against a student under the age of 16 years that does not meet the threshold of 'sexual abuse'

Peer (18 years or older) commits a child sexual offence against a student under the age of 16 years that does not meet the threshold of 'sexual abuse'

Student (18 years or older) commits a child sexual offence against a peer under the age of 16 years that does not meet the threshold of 'sexual abuse'

An allegation against any adult who commits a child sexual offence (where the information is obtained outside the course of employment).

Matters which may be encountered include:

carnal knowledge with or of children under the age of 16

distributing intimate images or prohibited visual recordings

maintaining a sexual relationship with a child.

Without a reasonable excuse (see Legislative References at section 4 of the Student Protection Processes), an adult who fails to disclose the information to a police officer as soon as reasonably practicable after the belief is, or ought reasonably to have been formed, commits a misdemeanour with a maximum penalty of three years imprisonment.

An adult who, in good faith, discloses information about a child sexual offence to a police officer is not liable civilly, criminally or under an administrative process for making the disclosure.

8. Confidentiality, Record Keeping and Information Sharing

It is essential that student protection processes are managed in a confidential manner that both preserves the dignity and privacy of all affected parties and ensures that any investigative process is not impaired.

The management of any student protection concern should be well-documented, with clear records of any disclosures made by a student and any actions taken by the school. All information relating to a student protection concerns, including notes, reports and other documents must be stored securely and confidentially.

Footnote: In this context, 'peer' means a young person of a similar age who is not a student of the school.

8.1 Will a student's family know I have made a report?

A person who notifies the Department responsible for Child Safety around a suspicion that a child has been or is likely to be harmed (known as the "notifier") cannot be identified unless certain exceptions apply. Where a student protection report results in a criminal court proceeding, the report may form part of the prosecution's evidence, therefore the staff member who made the report may be required to give evidence. Consequently, student protection reports must be completed in an impartial, accurate and factual manner.

8.2 Information Sharing

Within the school, information should not be shared around student protection matters with other staff members unless for a specific purpose under these processes, for example conferring with the Principal to determine whether a matter constitutes a reasonable suspicion of abuse or harm. Information may also be provided to staff members as part of ongoing support or risk management processes for a student.

There are a number of circumstances where a School Principal may be asked to share information, or be required to do so in order to support a student and their family:

- Under Part 4 of the *Child Protection Act 1999*, the Department responsible for Child Safety may request information around a student who may be in need of protection. Such requests should be in writing, and clearly specify what information is requested. The Principal should keep clear records around what information was provided in response and ensure that any information is accurate and factual.
- A Principal, as a 'particular prescribed entity' under the *Child Protection Act 1999* may share information with certain service providers in order to obtain support for a student and their family. As best practice, any referral for support should be with the knowledge and consent of a student's parents or care-providers, however a Principal may refer to service providers such as **Family and Child Connect** or **Intensive Family Support Services** without the prior consent of a parent or care-provider. These services will then seek the consent of the parent to engage them in providing support.
- Police may seek information from a Principal in relation to a law enforcement activity, for example in the investigation of a criminal offence, or in attempting to locate a missing child. Again, the Principal should keep clear records around what information was provided in response and ensure that any information is accurate and factual.

9. Support and Referral Services

When students and families receive support services early, it can avoid the escalation of concerns towards statutory intervention by the Department responsible for Child Safety or Police. Where a concern is identified that does not meet the threshold for a report to Department responsible for Child Safety or Police, or indeed where the outcome of a report is that no intervention by the authorities will occur, the Principal should consider any referral to appropriate support services:

9.1 Family and Child Connect

Community-based intake and referral services, known as 'Family and Child Connect' have been established across Queensland to provide an additional pathway for referring concerns about children and their families. Family and Child Connect provides information and advice to people seeking assistance for children and families where there are concerns about their wellbeing and can connect families to local services. Families can also contact Family and Child Connect themselves for advice and help.

9.2 Intensive Family Support Services

In addition to Family and Child Connect, Intensive family support services are funded services that provide family support delivered under a lead case management model to address multiple and/or complex needs and assist families to build their capacity to care for and protect their children.

Intensive family support services include:
Intensive Family Support;
Referral for Active Intervention;
Aboriginal and Torres Strait Islander Family Support Services;
Fostering Families.

Information around making a referral to these services can be found via the Department responsible for Child Safety website. Particular information around information sharing provisions for Principals are detailed in section 9.

9.3 Other referral options

In some cases, it may be desirable to refer a family to a specific local service in the community, particularly where the family's needs are clearly identified. For example, a family may be in need of financial or housing support. The Queensland Family and Child Commission's One Place website provides useful information about local services.

9.4 School based supports

There are a number of options to support students at risk within the school environment that can be implemented in addition to any external referral, including:
Referral to the school counsellor;
Engaging specific educational services to meet a student's needs;
Consideration of academic demands and providing flexible alternatives;
Identifying other school support staff, including pastoral care options and peer support;
Implementing risk management plans, particularly involving situations between students;
Providing protective behaviours education to students, including safety planning.

10. Understanding behaviour by a staff member a student considers to be inappropriate

For the purposes of these processes, staff inappropriate behaviour includes (though is not limited to) any behaviour, including words, towards a student that is contrary to what is required of staff members under the [Catholic School Authority] Code of Conduct.

Inappropriate behaviour by a staff member towards a student can be described in terms of *violations of professional boundaries*. These boundaries can be described as follows:

Physical Boundaries	Exist to protect the body. Physical boundaries define appropriate physical contact between staff members and students in appropriate circumstances whilst respecting and responding to the physical needs of students.
Emotional Boundaries	Exist to protect feelings. Emotional boundaries determine the nature of appropriate professional relationships between staff members and students in the context of respecting the emotional needs and wellbeing of students.
Behavioural Boundaries	Exist to protect actions. Behavioural boundaries determine the appropriate behaviours expected of a staff member towards students, including respecting the rules of the Catholic School Authority or School.

Examples of boundary violations appear on the following page.

10.1 Examples of boundary violations*

*See also The *Professional Boundaries: A Guideline for Queensland Teachers* as published by the QCT.

Physical Boundary Violations

Pushing

Pulling

Grabbing

Hitting

Poking shoving

Shaking

Throwing

Kicking

Pinching

Punching

Using physical force to ensure a child cooperates

Holding or restraining a child (unless in imminent danger of harm)

Using an object (ruler, book, whiteboard marker) to manage a student

Refusing biological necessities

Applying painful or noxious conditions to a student

Inappropriately touching or massaging a student

Unnecessary or unwanted physical contact

Emotional Boundary Violations

Making inappropriate comments about a student and/or a student's family by:

- Shaming
- Embarrassing, humiliating
- Using sarcasm
- Making derogatory remarks belittling
- Teasing
- Unprofessional criticism

Exerting power over a student through the use of:

- Intimidating behaviour
- Fear
- Threats
- Moral pressure

Shouting at a student

Behavioural Boundary Violations

Having inappropriate interactions with a student through:

Inappropriate use of social media in relation to a student

Phone calls emails or texts to the student's personal email or phone

Gift giving or showing special favours

Sharing secrets with a student

Disclosing inappropriate personal information to a student

Inappropriate questioning of a student about personal and private matters

Engaging in social activities with students (with whom there is not a declared personal relationship) outside school

Driving students without appropriate authority

Visiting students at home without appropriate authority

Using unprofessional language:

Swearing at or in the presence of a student

Making otherwise inappropriate comments to or in the presence of a student

Failing to follow a school's behaviour support policy and procedures:

Unreasonable, unfair and/or unjust disciplinary measures

The imposition of manifestly unreasonable expectations or excessive demands on a student

Using inappropriate locations or social isolation outside of the school's behaviour support guidelines as punishment

Using a personal device or private email address to make contact with a student (with whom there is not a declared personal relationship or appropriate authority)

Photographing a student other than for an appropriate professional reason. Supplying substances to a student (e.g. unauthorised medication, tobacco, alcohol, illicit drugs)

Exposing students to material that contains adult content or themes that is offensive or inappropriate to the age and/or maturity of the student

11. National Response Protocol

The Catholic Church has established a *National Response Protocol* to provide a framework for Church entities to offer a consistent response to children and adults who have been subjected to child abuse by Church personnel. Church personnel include clerics and religious, employees and volunteers currently or previously associated with a Church Authority or entity.

Queensland specific mandatory reporting requirements, as set out in the *Student Protection Processes for Queensland Catholic School Authorities*, will apply to Catholic School Authorities prior to the *National Response Protocol*.

If an individual seeks information concerning the *National Response Protocol,* a referral should be made to the Queensland Catholic Church Professional Standards Office at:

Phone: (07) 3324 3070

Toll Free: 1800 337 928

Email: psoqld@catholic.net.au

PO Box 3264, Brisbane QLD 4001.

12. Historical Allegations

When a staff member receives information that a former student has been sexually abused, or has suffered significant harm, by a staff member at the school, the staff member must follow the relevant Catholic School Authority processes.

If the allegation is against a current staff member, then [insert additional Catholic School Authority processes for dealing with allegations against staff members]

If the allegation is against a former staff member, then [insert additional Catholic School Authority processes for dealing with historical allegations against former staff member]