Child Protection and Child Safe Framework

Safeguarding our Students

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THE BUSY SCHOOL LTD. T/A THE BUSY SCHOOL

PART A - CHILD PROTECTION AND CHILD SAFE FRAMEWORK (INTRODUCTION)

Purpose

The purpose of this framework is to set a clear standard for how The BUSY School Ltd. t/a The BUSY School (**TBS**) keeps children safe across all settings. This framework brings together our public commitment, conduct expectations, child-safety risk management, statutory reporting duties, information sharing and records, training, and continuous improvement into a combined practical framework.

This framework explains what safe adult behaviour looks like, how risks are prevented and controlled, how concerns are raised and triaged the same day, and how we meet our legal duties to manage and report to external authorities. This framework is designed to be easy to use, is supported by procedures and templates, and evidenced in daily practice.

Scope

This framework applies to every person who engages with TBS students in any capacity, and to every context in which a student may be under the care, direction, or influence of a person connected to TBS, including during school hours, at school-related events, during transport, in online and digital settings, and in any out-of-hours interaction.

Who is bound

- All employees, including casual and temporary staff.
- Board members, the Director, the Executive Principal and all leaders.
- Volunteers, contractors, consultants, external providers, placement hosts and visiting service partners.
- Pre-service teachers, trainees, mentors, coaches and activity supervisors.
- Third parties delivering programs or services on behalf of TBS, on-site or off-site.
- Parents, carers and visitors while interacting with TBS students.
- Students, are expected to follow the Student Code of Conduct, and use the reporting pathways explained in student-friendly materials.

Where and when it applies

- All Queensland campuses and surrounding grounds, before school, during school and after school.
- Off-site activities including excursions, camps, VET and work placements, sport, community events and partner premises.
- Transport arranged or endorsed by TBS, including public, chartered and private transport used for school activities.
- Digital and online environments, including school devices and systems, staff personal devices used for school business, learning platforms, messaging tools, social media, video conferencing, photography and media.
- Any situation where a student has contact with, is supervised by, or may otherwise be affected by the conduct of a person connected to TBS, including interactions on-site, off-site, online, out-of-hours, one-to-one, or in any other context connected with TBS.

What the framework covers

- Our Child Safety Commitment and Child Protection Code of Conduct.
- Safeguarding principles and child-safety risk management for programs, people and environments.
- Clear reporting pathways for immediate safety, mandatory reporting, reportable conduct, Police referral and lawful information exchange.
- Privacy, information sharing and record keeping that support safety and compliance.
- Interfaces with complaints, so child-protection matters are not handled in generic complaint processes.
- Training, communication, public availability, and a live Child-Safe Action Plan with assigned accountable officers and timelines.
- Program assurance, regular reviews and documented improvements.

Everyone covered by this scope must know their responsibilities, act early on concerns, use approved systems and cooperate with external agencies when required.

Status:	Approved	**Supersedes:**	Child Protection Policy v8 Child Risk Management Strategy v8
Authorised by:	TBS QLD Board	**Date of Authorisation:**	June 2026

References:

Queensland legislation

- Child Protection Act 1999 (Qld)
- Child Safe Organisations Act 2024 (Qld)
- Education (General Provisions) Act 2006 (Qld)
- Education (General Provisions) Regulation 2017 (Qld)
- Education (Accreditation of Non-State Schools) Act 2017 (Qld)
- Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)
- Working with Children (Risk Management and Screening) Act 2000 (Qld)
- Working with Children (Risk Management and Screening) Regulation 2020 (Qld)
- Criminal Code Act 1899 (sections 229BB and 229BC)
- Domestic and Family Violence Protection Act 2012 (Qld)
- Work Health and Safety Act 2011 (Qld)
- Work Health and Safety Regulation 2011 (Qld)
- Information Privacy Act 2009 (Qld)
- Hospital and Health Boards Act 2011 (Qld) (confidentiality provisions)
- Ombudsman Act 2001 (Qld)
- Anti-Discrimination Act 1991 (Qld)
- Education (Queensland College of Teachers) Act 2005 (Qld)

- Weapons Act 1990 (Qld)
- Weapons Regulation 2016 (Qld)
- Summary Offences Act 2005 (Qld)
- Public Health Act 2005 (Qld)
- Medicines and Poisons Act 2019 (Qld)
- Medicines and Poisons Regulation 2021 (Qld)
- Invasion of Privacy Act 1971 (Qld)

Commonwealth legislation

- Privacy Act 1988 (Cth) and Australian Privacy Principles
- Online Safety Act 2021 (Cth)
- Work Health and Safety Act 2011 (Cth) - for national duties applying to some providers and venues
- Disability Discrimination Act 1992 (Cth)
- Disability Standards for Education 2005 (Cth)
- Sex Discrimination Act 1984 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Age Discrimination Act 2004 (Cth)
- Australian Human Rights Commission Act 1986 (Cth)
- Corporations Act 2001 (Cth) - whistleblower protections, Part 9.4AAA
- Spam Act 2003 (Cth)
- Copyright Act 1968 (Cth) - use of materials in learning contexts
- Fair Work Act 2009 (Cth) - staff management interface

Queensland compulsory standards, manuals and statutory guidance

- Non-State Schools Accreditation Board (Queensland) guidance and program guidelines (current editions)
- Queensland Child Safe Standards - Queensland Family and Child Commission
- Queensland Reportable Conduct Scheme guidance - Queensland Family and Child Commission
- Queensland Child Protection Guide and related resources - Queensland Department of Child Safety, Seniors and Disability Services
- Queensland Police Service (QPS) guidance for schools on reporting crime and preserving evidence
- Queensland Department of Education and Non-State Schools Accreditation Board guidance on student wellbeing, behaviour, attendance and adjustments

Sector guidelines and codes of practice

- First aid in the workplace guidance - Safe Work Australia and Workplace Health and Safety Queensland
- ASCIA Guidelines for Prevention, Management and Emergency Response in Schools and Children's Services (Anaphylaxis)
- eSafety Commissioner guidance for schools on online safety, image-based abuse and harmful content

- National Principles for Child Safe Organisations (used to inform practice alongside the Queensland Child Safe Standards)
- Office of the Australian Information Commissioner guidance on privacy in education settings
- Reportable Conduct Scheme – Guidelines.

Key documents within this framework

- Child Protection Code of Conduct
- Reportable Conduct Policy and Investigation Procedure
- Mandatory Reporting - Reportable Suspicion Procedure

Internal documents this framework interfaces with

- Feedback, Compliments and Complaints Handling Policy and Procedure
- Information Sharing and Record Keeping
- Cancellation of Enrolment Procedure
- Student Code of Conduct and Staff Code of Conduct
- Administration of Medication Policy
- Substance Management Plan
- Parent Community Code of Conduct
- Critical Incident Management Framework and Emergency Response Procedures
- Whistleblower Policy

Review Date: Annually **Next Review Date:** June 2027

Policy Owner: The BUSY School Ltd – QLD Board of Directors

PART B - Child Safety Statement

TBS keeps children safe, respected and heard in every setting. We have zero tolerance for abuse, neglect, grooming and degrading treatment. This document sets out a clear framework that brings together our conduct expectations, child-safety risk management, statutory reporting duties, lawful information sharing, privacy safeguards, training, and continuous improvement.

Every adult connected to our school addresses concerns early, follows same-day reporting pathways, and records what they did and why. We prohibit corporal punishment. We design environments that are observable and interruptible, make inclusion practical, and provide student-friendly ways to seek help. Where law requires external reporting, we do it immediately.

Where support is needed, we offer it with dignity.

Evidence in practice, not words alone, is our standard.

Principles and context

- **Student first.** Safety, dignity and participation guide every decision. We listen to students, close the loop on concerns, and make reasonable adjustments so every student can take part.
- **One integrated system.** This framework operationalises compulsory Queensland Child Safe requirements and legislation. For Queensland education services, the Queensland Child Safe Standards apply from 1

January 2026, and the reportable conduct scheme applies from 1 July 2026. The framework sits within a single, integrated approach supported by procedures, templates, and an action plan.

- **Clear conduct, safe boundaries.** Adults model professional behaviour in person and online, use approved platforms, keep interactions visible, and avoid private or exclusive relationships with students.
- **Early reporting and lawful pathways.** Concerns are triaged the same day. Mandatory reporting, Police referral, and reportable conduct notifications proceed immediately. Concerns that do not involve risk of harm, abuse, neglect, grooming, or reportable conduct; for example, facility complaints, curriculum feedback, or administrative disputes, are handled in accordance with the Feedback, Compliments and Complaints Handling Policy and Procedure.
- **Inclusion and equity.** We create culturally safe, accessible environments for Aboriginal and Torres Strait Islander students, students with disability, students from culturally and linguistically diverse backgrounds, LGBTQ+ students and those with care experience.
- **Proportionality and procedural fairness.** We take the least intrusive, effective action to keep people safe, apply fair process, and make evidence-based decisions.
- **Risk managed in context.** We design controls for people, programs, places and platforms, and we pause any activity that cannot be controlled to a safe level.
- **Privacy by design.** We collect only what we need, share the minimum necessary on a need-to-know basis, and keep accurate, timely records in approved systems.
- **Capability and supervision.** Everyone completes induction and annual refreshers. Leaders coach teams and ensure that supervision, digital settings, and records meet the standard.
- **Partnership with families and community.** We communicate in plain English, offer interpreters and accessible formats, and provide clear public information on how to get help.
- **Assurance and improvement.** We test our system regularly, fix gaps quickly, and provide proof through decision logs, audits, and a live Child-Safe Action Plan.
- **Scope and settings.** This framework applies to all people who engage with our students and to all activities on-site, off-site and online, including excursions, camps, VET and work placements, transport, and programs delivered by external providers.
- **Interfaces.** Child safety allegations are managed in accordance with this framework. Other complaints are handled in accordance with the Feedback, Compliments and Complaints Handling Policy and Procedure. Information sharing, records, student behaviour and health plans align with the related documents named in our policy suite.

PART C - Definitions

Adult, worker or staff	Any person engaged by the school in paid or unpaid work, including (full-time, part-time, and casual) employees, contractors, volunteers, Board members, pre-service teachers, mentors, coaches and external providers working on-site or off-site. This also includes visitors to the school grounds, whether working or not.
Allegation (child protection)	A concern that a child may have been harmed, is at unacceptable risk of significant harm, or that a worker may have engaged in reportable conduct. Allegations follow the Child Protection response and reporting pathway.
Anonymous report	Information received without the reporter's identity.

	Anonymous reports are accepted and acted on using the available details.
Approved platforms	School-authorised systems for communication and storage, for example, school email, phone, learning platforms, video conferencing, the student information system and approved file storage.
Behaviour of concern	Conduct that may harm a child, breach the Code, or create a serious risk to safety or well-being, in person or online.
Child/student	Any person under 18 years enrolled with the school or participating in a school activity.
Child in need of protection	Per s10 of the Child Protection Act 1999; A child in need of protection is a child who— (a) has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and (b) does not have a parent able and willing to protect the child from the harm.
Child Protection Code of Conduct (the Code)	TBS's rules for safe, professional behaviour with students, including boundaries for communication, physical contact, one-to-one settings, photography and online conduct.
Child Protection Officer (CPO)	A trained staff member who provides same-day intake and triage, confirms legal pathways, supports mandatory reporting and records decisions.
Child Safe Action Plan	The live, evidence-based plan that assigns tasks, owners, dates and proof to embed child safety across people, programs, places, platforms and partners.
Child Safe Standards	(a) Child safety and wellbeing is embedded in the entity's organisational leadership, governance and culture; (b) Children are informed about their rights, participate in decisions affecting them and are taken seriously; (c) Families and communities are informed and involved in promoting child safety and wellbeing; (d) Equity is upheld and diverse needs respected in policy and practice; (e) People working with children are suitable and supported to reflect child safety and wellbeing values in practice; (f) Processes to respond to complaints and concerns are child-focused; (g) Staff and volunteers of the entity are equipped with the knowledge, skills and awareness to keep children safe through ongoing education and training; (h) Physical and online environments promote safety and wellbeing and minimise the opportunity for children to be harmed; (i) Implementation of the child safe standards is regularly reviewed and improved; (j) Policies and procedures document how the entity is safe for children.

Child safety incident	Any event, disclosure or observation that suggests a child has been harmed, is at risk of harm, or that the Code or law may have been breached, including online incidents.
Complaint (service)	A concern about service quality, communication, facilities or a school decision that does not indicate risk of harm or reportable conduct. Service complaints are handled in accordance with the Feedback, Compliments and Complaints Handling Policy and Procedure.
Confidential information	Information about a student or family that is shared on a need-to-know basis to protect safety, deliver education or meet the law. Confidentiality does not prevent lawful reporting.
Corporal punishment	Any act intended to inflict physical pain or discomfort on a student for disciplinary purposes. Corporal punishment is prohibited.
Decision log	A dated record of key child protection decisions, who made them, what information was relied on, and why a pathway was chosen.
External provider	An organisation or individual engaged to deliver services, programs or supervision to students on behalf of the school, including VET hosts and work placement providers.
Family/parent/carer	A person with parental responsibility or day-to-day care for a student, consistent with any court or care orders.
Grooming	Any conduct by an adult in relation to a child, or a person who has care of a child, with intent to (a) facilitate the procurement of the child to engage in a sexual act, either in Queensland or elsewhere; or (b) expose, without legitimate reason, the child to any indecent matter (including indecent film, videotape, audiotape, picture, photograph or printed or written matter), either in Queensland or elsewhere. Conduct may include behaviour that builds trust or control to facilitate abuse, in person or online. This includes secrecy, special treatment, boundary-testing and gradual sexualisation.
Harm	Per s 9 of the *Child Protection Act* 1999, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. 1. It is immaterial how the harm is caused. 2. Harm can be caused by- a) physical, psychological or emotional abuse or neglect; or b) sexual abuse or exploitation. 3. Harm can be caused by- a) a single act, omission or circumstance; or a series or combination of acts, omissions or circumstances.
Head of Relevant Entity (the Director)	The Director of The Busy School Ltd ('**the Director**'), who is the accountable officer for reportable conduct notifications, impartial investigations and outcomes.
Health information	Information about a person's health or disability, treatment or care. Health information is handled with heightened protections and shared only with those who need it to keep the student safe or deliver support.
Information sharing	Providing the minimum necessary information to another authorised person or body to protect a child, meet reporting duties or support education. Sharing is recorded in the decision log.

Mandatory reporter	A staff member who is a mandatory reporter under Queensland law must make a report when they form a reportable suspicion. For sexual abuse or likely sexual abuse, reports must be given to the Campus Principal immediately, and the Campus Principal must report to Queensland Police Service immediately (EGPA s.366 and s.366A). For all other reportable suspicions (significant harm caused by physical or sexual abuse where a parent may not be able and willing to protect the child), mandatory reporters must report to Child Safety as soon as reasonably practicable, the same day (CPA s.13E). Mandatory reporters make or support the report, with support from a Child Protection Officer.
Observable and interruptible	A supervision standard where interactions are visible to others and can be interrupted at any time. It applies to in-person and online settings.
Online environment	Digital tools and spaces used for school purposes, for example, learning platforms, messaging, video meetings, email, websites, social media, and storage of images and recordings.
Personal Emergency Evacuation Plan (PEEP)	A plan that sets how a specific student will evacuate or shelter in an emergency from identified rooms and floors.
Personal information	Information or an opinion about an identifiable person, recorded or not. Access is restricted, and use is limited to legitimate school purposes.
Prescribed body	An agency authorised to receive or exchange information to promote the safety, welfare or well-being of children. Sharing is limited to what is necessary and recorded.
Procedural fairness	A fair process where a person knows the nature of a concern, has a genuine chance to respond, and an impartial decision maker decides on relevant information.
Professional boundaries	Clear limits that preserve safe, respectful relationships between adults and students, including limits on contact, gifts, personal disclosure and social media.
Reasonable adjustment	A practical change that enables a student to participate safely and on the same basis as peers without lowering academic standards or creating unjustifiable hardship.
Reportable allegation	An allegation or other information that leads a person to form a reasonable belief that a worker of a reporting entity has committed – (k) reportable conduct; or (l) misconduct that may involve reportable conduct. It is irrelevant whether or not the conduct or misconduct is alleged to have occurred in the course of the worker performing work for the reporting entity.
Reportable conduct	Per section 26 of the *Child Safe Organisations Act 2024* (Qld), means: (a) a child sexual offence (a child sexual offence under the *Criminal Code, s 207A*; an offence of a sexual nature committed in the presence of a child; includes an act or omission committed outside Queensland that would be a child sexual offence if it were committed in Queensland);

(b) sexual misconduct committed in relation to, or in the presence of, a child (e.g. inappropriate touching, voyeurism, use of sexual language without legitimate reason);

(c) ill-treatment of a child (conduct that is unreasonable and seriously inappropriate, improper, inhumane or cruel – e.g. making excessive or degrading demands, a pattern of hostile or degrading comments or behaviour, using inappropriate forms of behaviour management);

(d) significant neglect of a child (a failure to meet the basic needs of the child that is deliberate or reckless)

(e) physical violence committed in relation to, or in the presence of, a child (intentional or reckless application of physical force to a person without lawful justification or excuse; or an act that intentionally or recklessly causes a person to anticipate immediate and unlawful violence to the person; does not include the application of trivial, negligible or insignificant physical force to a person)

(f) behaviour that causes significant emotional or psychological harm to a child (detrimental to the emotional or psychological wellbeing or development of a child)

Conduct may be *reportable conduct* whether or not a criminal proceeding in relation to the conduct has commenced or concluded.

Conduct may be a single act or omission or a series of acts or omissions, even if each act or omission does not, of itself, amount to reportable conduct.

Reportable conduct does not include conduct that is reasonable for the discipline, management or care of a child having regard to –

(a) the characteristics of the child, including the age, developmental stage and health of the child; and
(b) any code of conduct or professional standard applying to the conduct.

It is irrelevant whether the reportable conduct occurred during the course of the worker performing work for the entity (and may include online conduct).

From the commencement of the Queensland reportable conduct scheme for education services, reportable conduct matters must be notified and managed in accordance with the scheme's requirements.

Reportable conviction

Of a worker of a reporting entity, is a conviction for an offence committed by the worker against a law of a State or the Commonwealth that may involve reportable conduct.

It is irrelevant whether or not the offence or conduct is alleged to have occurred in the course of the worker performing work for the reporting entity.

Reportable suspicion

A *reportable suspicion* about a child is a reasonable suspicion that the child –

	(a) has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and (b) may not have a parent able and willing to protect the child from harm.
	Under the Child Protection Act 1999, s.13E(1), relevant persons who are mandatory reporters in a school context include doctors, registered nurses, teachers (as defined under the Education (Queensland College of Teachers) Act 2005) and early childhood education and care professionals (see CPA s.13E(1) for the full list of relevant persons). A mandatory reporter must make a report when they form a reportable suspicion. At TBS, all staff are required to report concerns internally the same day; mandatory reporters have additional personal statutory obligations to report to Child Safety. Mandatory reporters must report to Child Safety as soon as reasonably practicable, the same day, and record the decision path. Where the reportable suspicion involves sexual abuse, the EGPA pathway also applies, and the report must be given to the Campus Principal immediately for reporting to Queensland Police Service immediately (see Reporting sexual abuse at a non-state school).
Support plan	A short plan that sets agreed supports and roles in response to a safety or well-being need, for example, a Student Safety and Support Plan for a student returning from a period of suspension, or a Medical Health Care Plan.
Third party	Any person or organisation not employed by the school but who interacts with students on school grounds, at school-related events, or in any context connected to TBS, for example, contractors, visitors, guest speakers, partner agencies, family members and members of the public present at school-supervised locations.
Victimisation	Unfair treatment of a person because of the person's involvement in a complaint or their attempt to exercise their rights. Can be a one-off incident or a pattern of behaviour (can be obvious or subtle – what matters is the unfair treatment happens because of the person's involvement in a complaint or their attempt to exercise their rights).
Blue Card	A Working with Children Check for Queensland. A current Blue Card (or exemption card, where applicable) must be verified and recorded before engagement in child-related work, and monitored throughout engagement in accordance with the school's risk management strategy.

PART D - Roles and Responsibilities

- **Board:**
    - Set the tone for child safety and ensure this Framework is current and the school is adequately resourced with trained personnel, systems and processes to meet its child safety and child protection obligations.
    - Receive de-identified assurance reports and challenge performance against the Child Safe Standards.
    - Confirm that lessons from incidents lead to changes in systems, training and design.

- Lead and support a culture of continuous improvement in child safe practices, ensuring ongoing refinement of systems, processes and behaviours.

- **Director of The Busy School Ltd**
  - Providing strategic leadership to embed a strong child safe culture aligned with legislative and regulatory requirements
  - Ensuring robust policies, frameworks and systems are in place and effectively implemented across all campuses
  - Maintaining oversight of compliance, risks and emerging issues, and providing assurance to the Board
  - Overseeing the management of serious incidents, including reportable conduct matters, and ensuring appropriate reporting to external authorities
  - Ensuring capability across the organisation through appropriate training, guidance and support structures
  - Driving continuous improvement in child safe practices, informed by data, audits and sector developments
  - Ensure the entity has in place:
    - A system for preventing the commission of Reportable conduct by a worker of the entity in the course of performing work for the entity;
    - A system for enabling any person, including a worker of the entity, to notify the head of the entity of a reportable allegation or reportable conviction relating to a worker of the entity of which the person becomes aware;
    - A system for enabling any person, including a worker of the entity, to notify the commission of a reportable allegation or reportable conviction involving the head of the entity of which the person becomes aware; and
    - A system for investigating and responding to Reportable allegation or Reportable conviction relating to a worker of the entity.
  - In Consultation with the Executive Principal and relevant Campus Principal (and delegated as required):
    - Ensure immediate safety is addressed, appoint an impartial investigator where required, and put interim measures in place;
    - Ensure Police are notified when criminal conduct is suspected and support mandatory reporters;
    - Decide outcomes, communicate with families as permitted by law, and ensure records are complete and secure.
  - Comply with obligations as *head of the relevant entity* for the purposes of the Reportable Conduct Scheme including with respect to:
    - Notifying the Queensland Family and Child Commission of reportable allegations or reportable convictions about a worker
      - initial report within 3 business days of becoming aware of the allegation or conviction;

        - interim report within 30 businss days after becoming aware of the allegation or conviction;
        - final report as soon as practicable after the investigation is completed.
    - Complying with further requests for information and other directions of the Commission.

- **Campus Principal:**
    - Ensures any reportable conduct allegations or reportable convictions are made to the Director;
    - Lead local implementation, visibility and access to reporting pathways.
    - Make spaces observable and interruptible, set supervision routines, and check contractor and volunteer compliance.
    - Ensure names and contacts for CPOs are displayed, and that after-hours coverage is clear.
    - Certify each term that training, registers and site controls are current.
    - Provide practical coaching to staff on boundaries, reporting and documentation.

- **Child Protection Officers (CPOs):**
    - Act as the first point of contact for staff, students and families.
    - Triage concerns the same day, confirm the legal pathway, and record the decision and rationale.
    - Support mandatory reporters to make reports to the Queensland Department of Child Safety, Seniors and Disability Services, where a reportable suspicion is formed.
    - Coordinate information sharing with prescribed bodies, keep confidential records, and brief the Campus Principal on emerging risks.
- **Executive Principals:**
    - Delegate tasks where appropriate, retain overall accountability, and manage conflicts of interest.
    - Providing leadership to embed a strong child safe culture aligned with TBS policies and legislative requirements
    - Ensuring consistent implementation and monitoring of child protection practices across campuses
    - Undertaking compliance oversight, including audits and reviews, and escalating risks or systemic issues to the Director
    - Supporting Campus Principals in managing complex matters and building capability
    - Overseeing the management of significant incidents, including reportable conduct matters, ensuring appropriate reporting and follow-up
    - Contributing to continuous improvement, including policy development and system-wide enhancements
- **Head of School Administration:**
    - Maintain this Framework, procedures, templates and decision logs.
    - Monitor incident trends, complete targeted audits, and provide dashboards to the Executive Principal and Board.
    - Quality assure investigations, timeframes and records, and coordinate improvement actions.

- **Head of School Administration (Privacy):**
    - Advise on lawful collection, use and sharing of information.
    - Ensure records are accurate, secure and retained for the required periods.
    - Lead the response to any privacy or data breach that intersects with child safety.
- **Lead People and Culture Business Partner:**
    - Verify Working With Children Checks and identity, keep live registers, and stop any engagement that does not meet screening requirements.
    - To conduct investigations where appointed as an internal investigator by the Director;
    - To assist with ongoing risk management including any lawful and reasonable directions to staff during the course of an investigation (including up to suspension – in accordance with any applicable Award or Enterprise Agreement).
    - Embed child safety expectations in role descriptions, induction and performance.
- **Chief Information Officer:**
    - Approve and secure digital platforms, enforce access controls, and retain system logs that support investigations.
    - Provide safe settings for messaging, video and content sharing, and support take-down of harmful material.
- **Teachers, trainers and support staff:**
    - Model the Code of Conduct and professional boundaries in every interaction.
    - Know which students are at risk and the controls in your setting.
    - Act immediately on concerns, tell a CPO or the Executive Principal the same day, and keep brief, factual notes.
    - Use only approved platforms for contact and store records in school systems.
- **Volunteers and contractors:**
    - Complete induction, agree to the Code and provide Blue Card evidence where required.
    - Follow staff directions, report concerns at once, and never work outside the agreed scope.
- **Students:**
    - Treat others with respect, follow the Student Code of Conduct, and use help-seeking and reporting options when something feels unsafe.
- **Parents and carers:**
    - Partner with us on safety, share relevant information promptly, and raise concerns early using the published pathways.
- **External providers and host employers:**
    - Meet our screening, supervision and child-safety requirements before delivery starts.
    - Ensure your staff understand our rules, report concerns the same day, and provide records back to our systems.

Delegations and decision rights

- **Immediate danger:** any adult calls 000 and protects the student.
- **Same-day triage:** CPO confirms pathway and documents the decision.
- **Mandatory reporting:** the staff member who forms a reasonable belief makes the report, through the Campus Principal.
- **Reportable conduct:** the Director of The Busy School (Ltd)notifies the Queensland Family and Child Commission and manages the process to closure.
- **Police referral:** the campus principal, supported by the Executive Principal or delegate notifies Queensland Police Service (QPS) when a crime may have occurred.
- **Sexual abuse and likely sexual abuse at a non-state school**: the worker provides a written report to the Campus Principal (or the Executive Principal, Board Chair or nominated Director if the Campus Principal is the subject), and the Campus Principal must immediately provide a copy of that report to Queensland Police Service.
- **Investigation lead:** appointed by the Director of The Busy School (Ltd), free from conflict, internal or external as required.
- **Interim risk controls:** Campus Principals implement and monitor, Executive Principal approves high-impact measures.

Business continuity and availability

- Publish current CPO and Executive Principal contacts on campus noticeboards and the website.
- Nominate deputies for periods of leave and after-hours coverage.
- Keep a simple on-call process for urgent matters outside school hours.

Records and confidentiality

- Use approved systems for all notes, decision logs and evidence.
- Share on a need-to-know basis, protect identities, and retain records in line with school schedules.
- Never delay urgent reporting because of record-keeping tasks. Do the right thing first, then document.

Capability and culture

- All adults complete induction and annual refreshers on child protection, boundaries and online safety.
- CPOs and investigators complete advanced training.
- Leaders coach teams routinely and correct practice early.

Everyone's five non-negotiables

1. Put student safety first.
2. Follow the Code of Conduct and professional boundaries.
3. Report concerns the same day to a CPO or the Executive Principal.
4. Keep information confidential and use approved systems.
5. Cooperate with external agencies and school processes until matters are resolved.

PART E - CHILD SAFETY COMMITMENT STATEMENT

At TBS, child safety is non-negotiable. We place the safety, rights and well-being of every student at the centre of our decisions. We have zero tolerance for child abuse, neglect, grooming or degrading treatment. We expect every adult connected to our school to act early on concerns, follow clear rules for safe behaviour and use the reporting pathways set out in our policies.

Leadership and culture	Our leaders set the tone. The Director of The Busy School (Ltd) , Executive Principal and Board oversee our child-safe culture, resource it properly, and ensure that what we say is what we do. Every adult who works with us accepts personal responsibility for child safety. Speaking up is expected. Retaliation or victimisation against anyone who raises a concern is prohibited.
Safe adults & clear conduct	We maintain a Child Protection Code of Conduct and professional boundaries, so expectations are clear before problems arise. We verify Working With Children Checks, confirm identity and suitability, and train people before they start. Our recruitment processes, including advertising and interviews, emphasise child safety as a core value. We keep skills current through annual refreshers covering reporting duties, online safety, and respectful behaviours.
Safe environments and risk controls	We design risk out of environments and programs whenever possible. We plan supervision, make spaces observable and interruptible, manage digital platforms carefully, and risk-assess higher-risk settings such as excursions, work placements, changerooms, and one-to-one support. We check that external providers meet our child-safety requirements before they work with students.
Listening to students and families	Student voice matters. We invite feedback in ways students trust, provide simple help-seeking options and respond with care. Students can access age-appropriate protective behaviours education and sexual abuse prevention information as part of our student wellbeing program. Families are partners in safety, so we communicate clearly, make materials accessible and close the loop after concerns are raised.
Inclusive and culturally safe practice	We create environments where Aboriginal and Torres Strait Islander students, students with disability, students from culturally and linguistically diverse backgrounds, LGBTQI+ students and those with care experience feel respected, included and safe. We remove barriers, make reasonable adjustments, and ensure our decisions uphold dignity and fairness.
Simple, safe reporting and support	If a student is at immediate risk, we call 000. Concerns are triaged the same day by trained Child Protection Officers. We report to Queensland Police Service (QPS) where a crime may have occurred, including where we become aware of, or reasonably suspect, sexual abuse or likely sexual abuse of a student under 18 at a non-State school.

	Where a mandatory reporter forms a reportable suspicion, we make a report to the Queensland Department of Child Safety, Seniors and Disability Services (Child Safety) as soon as practicable and record the decision path using the Queensland Child Protection Guide. From 1 July 2026, we will also notify and manage reportable conduct matters in line with the Queensland reportable conduct scheme administered by the Queensland Family and Child Commission. We keep those involved informed as the law allows and connect them with support.
Privacy, information sharing and records	We protect privacy and share only what is necessary to keep children safe or to comply with the law. We use secure systems, maintain clear decision logs, and share information with Child Safety, Queensland Police Service (QPS), and other prescribed entities where authorised or required under Queensland law, including relevant information-sharing provisions.
Continuous improvement	We learn from incidents, feedback and audits. We maintain a Child-Safe Action Plan with owners and timelines, test our controls, and publish key materials so our community knows what to expect. We review this framework and our practice regularly to keep pace with standards and community expectations.

This statement applies to every person connected with our school, in every setting where school activities occur, on-site, off-site and online. It is our promise to students and families that safety is visible in our conduct, our systems and our everyday practice.

PART F - CHILD SAFEGUARDING PRINCIPLES AND SCOPE

This Framework operationalises our child-safe approach across leadership, people, environments and practice, ensuring that every decision at TBS prioritises student safety. It translates our public commitment into day-to-day standards that guide conduct, reduce risk, enable early reporting, and drive continuous improvement.

Our safeguarding principles

Student first	Safety, dignity and participation guide every decision. We listen to students, act early on concerns and make reasonable adjustments so that every student can take part. We recognise the importance of friendships and peer support in helping students feel safe, connected and less isolated.
Clear conduct and safe boundaries	Adults model respectful behaviour, maintain professional boundaries and use approved platforms for all contact, including online and after hours.
Risk managed in context.	We identify risks in programs, spaces and roles, then design controls that are visible and practical. This includes observable, interruptible supervision, careful planning for high-risk settings, and vetting of people and providers.
Inclusion and cultural safety	We meet our statutory duties, share only what is necessary to protect children, and keep clear records that show what we did and why.
Lawful reporting and information sharing	Same-day triage of concerns, external reporting where required, contemporaneous decision logs, secure storage, and controlled information sharing.

Capability and accountability	Everyone understands their role, completes training and follows simple procedures. Leaders check that standards are working and respond quickly when they are not.
Transparency and improvement	We encourage speaking up, prohibit retaliation and victimisation, learn from incidents and feedback, and update controls and training accordingly.

Scope of people

This framework binds every person who engages with TBS students, whether paid or unpaid, on-site or off-site, online or in person:

- Employees, including casual and temporary staff
- Executive Principal, leaders, the Director and Board members
- Volunteers, contractors, consultants, external providers and visiting service partners
- Pre-service teachers, trainees, mentors, coaches and activity supervisors
- Host employers and supervisors for work placements and VET delivery
- Parents, carers and visitors while on school grounds, at school-related events, or interacting with TBS students in any context connected to the school
- Students, who are expected to follow the Student Code of Conduct and use help-seeking and reporting pathways.

Scope of settings and activities

This framework applies wherever school activities occur, including:

- all Queensland campuses, classrooms, workshops, kitchens, laboratories, studios, libraries and outdoor areas
- bathrooms and changerooms, first aid rooms and well-being spaces
- excursions, camps, sport, community events, work placements and partner premises
- transport arranged or endorsed by TBS
- digital environments used for school purposes, for example, learning platforms, messaging tools, video conferencing, email, websites, photography and media
- out-of-hours communications that relate to school matters or involve school platforms or devices.

Scope of safeguards and controls

This framework covers the full suite of safeguards needed to keep children safe:

People controls	Working With Children Check verification, role-based screening, induction, annual refreshers and clear decision rights for child protection officers and leaders.
Practice controls	Professional boundaries, supervision design, one-to-one contact rules, safe physical contact guidance, online safety settings, image consent and storage rules.
Program and place controls	Risk assessments for higher risk activities and spaces, for example, changerooms, one-to-one support, excursions, camps and work placements, with specific controls for visibility, ratios and emergency response.

Third-party controls	Due diligence, child-safety clauses, identity and Blue Card checks, orientation to school rules, and monitoring of deliveries by external providers and hosts.
Reporting and records	Same-day triage of concerns, external reporting where required, contemporaneous decision logs, secure storage, and controlled information sharing.
Assurance and improvement	Term checks, targeted audits, incident reviews, student and family feedback, and a live action plan with owners and timelines.

Non-negotiables

We have zero tolerance for abuse, neglect, grooming or degrading treatment. Corporal punishment is prohibited. Retaliation and victimisation against anyone who raises a concern is not permitted. Everyone covered by this framework must know how to raise a concern, act early and use approved systems, so child safety is evident in everyday practice.

PART G - CHILD PROTECTION CODE OF CONDUCT

This Code sets the standard for safe, respectful adult behaviour with students at TBS. It applies to every adult who engages with our students, on-site, off-site, and online. Follow these rules in full. If you are unsure, choose the safer option and seek advice immediately.

Foundations of safe conduct

- Put student safety, dignity and participation first in every decision.
- Keep interactions observable and interruptible, in person and online.
- Use only approved school platforms for communication and keep clear records.
- Share information on a need-to-know basis and protect privacy.
- Act early on concerns and report the same day using the published pathways.

Communication and online behaviour

Always

- Use school email, phone systems, learning platforms and messaging tools.
- Communicate during reasonable hours and in a professional tone.
- Keep group communication wherever possible and copy a colleague when it is not.

Never

- Use personal email, personal social media, gaming chats or private messaging with students.
- Friend, follow or direct message students from personal accounts.
- Delete or conceal messages related to school matters.

Good practice

- Keep messages brief, factual and related to learning, safety or well-being.
- Record important decisions or directions in the student record the same day.

Physical contact

Permitted

- Contact that is necessary for instruction, safety, first aid or disability support, with explanation and consent where possible.

	• Brief, non-intimate gestures in context, led by the student, for example, a congratulatory handshake.
Not permitted	• Intimate, aggressive, coercive or prolonged contact. • Tickling, lap-sitting, massage, playful wrestling, or any contact used as punishment or control.
Good practice	• State your intention before any necessary contact. • Use alternatives such as demonstrations or verbal prompts when feasible. • Record unusual situations and inform your leader.

One-to-one settings and meetings

Standards	• Use open rooms or spaces with clear visibility, or keep doors ajar. • Schedule within school hours where possible. • Tell a colleague where you are and record time, purpose and outcome in the student record.
Transport and off-site contact	• Avoid transporting students in private vehicles. • If transport is unavoidable due to immediate safety or emergency, seek prior approval where practicable, ensure another adult is present where feasible, inform the office and record details. • On excursions, VET and work placements, follow supervision plans and venue briefings, and avoid isolated one-to-one contact.
Gifts, money and personal favours	• Avoid gifts to or from students. If a small token is culturally expected, declare it and, where possible, gift it to a group rather than an individual. • Do not lend or borrow money, purchase personal items or provide meals outside approved programs. • Do not ask students to run personal errands, and do not run personal errands for students.
Social relationships and conflicts of interest	• Do not form private social relationships with students or their families. • Disclose any pre-existing community connections to your leader and agree on a simple management plan. • Romantic or sexualised conduct with a current student is prohibited. • Romantic or sexualised conduct with a former student under 18 is prohibited. • Romantic or sexualised conduct with a recent former student is not permitted within 24 months of their leaving school and never where a power imbalance remains.
Tutoring, coaching and external contact	• Do not privately tutor or coach a current TBS student outside school unless approved in writing by the Campus Principal, with clear records, locations and boundaries. • All external roles that may intersect with students must be declared and managed to avoid conflicts.
Photography, video and media	• Check consent settings before capturing, publishing or tagging student images. • Use school devices where possible and store media on school systems. • Do not keep student images on personal devices or publish them on personal accounts.

Language and conduct standards	• Use respectful, plain language. Never ridicule, shame or use demeaning nicknames. • Do not discuss your private relationships, adult topics or personal problems with students. • Do not consume alcohol or drugs before or during any activity involving students. Do not encourage or permit student access to alcohol, vapes or other substances.
Privacy, information sharing and records	• Keep accurate, dated notes of significant contacts, decisions and incidents in approved systems. • Share only the minimum information necessary to keep students safe or meet the law. • Do not access or disclose student information without a legitimate school purpose.
Prohibited conduct	• Any form of child abuse, neglect, grooming or degrading treatment. • Corporal punishment and any threat of physical punishment. • Sexualised behaviour, comments, jokes, materials or messaging. • Secret or exclusive relationships, special favours or gifts that create dependence or confusion. • Viewing, creating or distributing illegal or inappropriate content.

Decision test

Before you act, ask three questions:

1. **Purpose:** Is this necessary for learning, safety or well-being?
2. **Transparency:** Would I be comfortable if a parent, carer or leader observed this?
3. **Proportion:** Is there a safer, less personal way to achieve the same outcome?
   If any answer is no, stop and seek advice.

Reporting and seeking advice

- If a student is in immediate danger, call 000.
- Report concerns the same day to a Child Protection Officer or the Executive Principal.
- If you are unsure, ask for advice before acting. Good-faith reports are protected. Retaliation and victimisation is prohibited.

Breaches and consequences

Breaches of this Code are child-safety incidents. TBS will act quickly and fairly. Responses may include coaching, formal direction, changes to duties, disciplinary action, or termination of engagement, and may consist of notifications to external authorities where required.

Acknowledgement

All employees, volunteers and contractors must read this Code, ask questions if unsure, and confirm in writing that they will follow it in every setting where school activities occur.

PART H - CHILD-SAFETY RISK MANAGEMENT

We design safety into people, programs, places and platforms so risks are reduced before harm can occur. Our tolerance for child-safety risk is low. If a risk cannot be controlled to a safe level, the activity is not permitted to proceed.

Our approach

Five-step cycle

1. Identify risks.
2. Assess likelihood and impact.
3. Select practical controls.
4. Implement and record.
5. Monitor and improve.

Clear decision rights

The Director (or delegate) approves any activity with a High or Extreme residual risk. Executive Principals approve routine moderate risks and ensure controls are in place. Staff lead and document classroom and activity-level risks.

Same-day visibility

Concerns that affect safety are escalated the same day to a Campus Principal or the Executive Principal, then recorded in the risk or incident system.

What we assess

People risks

Recruitment and screening, Working With Children Checks, induction quality, supervision capability, volunteers and contractors, conflicts of interest, and one-to-one settings.

Program and activity risks

Practical classrooms and workshops, changerooms, first aid rooms, excursions, camps, sport, VET and work placements, tutoring and mentoring, student leadership roles, and after-hours activities.

Place risks

Line of sight and visibility; secluded or low-traffic areas; lighting; access control; visitor flows; transport pick-up and drop-off; and emergency egress.

Digital and media risks

Platform security, messaging and video settings, image consent and storage, social media use, BYOD interactions, online tutoring, and recording rules.

Cohort risks

Needs of Aboriginal and Torres Strait Islander students, students with disability, culturally and linguistically diverse students, LGBTQ+ students, students with care experience, and students with specific medical risks.

Minimum controls all staff apply

- Observable and interruptible supervision in all interactions, including online.
- Approved platforms only for communication, with records captured in school systems.
- Two-adult preference for high-risk tasks and meetings where practicable.
- Clear boundaries using the Child Protection Code of Conduct and professional boundaries guidance.
- Rapid reporting of concerns the same day, with privacy protected on a need-to-know basis.

Control library for common scenarios

TBS maintains a control library that sets specific, practical controls for common school scenarios including classrooms and workshops, bathrooms and changerooms, first aid and well-being spaces, one-to-one support, excursions, camps and overnight stays, VET and work placements, transport, external providers and visitors, and digital learning and media. The control library is reviewed termly and updated after incidents or changes to settings.

The detailed control library is maintained in Appendix C (Internal Assurance and Operational Detail).

Planning requirements and triggers

- Complete a brief classroom risk check at the start of each term or when room layouts change.

- Complete an activity risk assessment for excursions, sport, camps, VET, high-risk curriculum and events with external providers.
- Review risks after any incident or near miss, and when student needs, venues, staffing or technology changes.

Supervision standards

- Ratios match activity risk and student needs. Campus Principals approve ratios for higher-risk activities.
- Duty rosters cover hotspots and blind spots, with visible staff presence at breaks, transitions and transport zones.
- Student leaders do not supervise peers without a named adult supervisor and clear boundaries.

Technology and online safety

- Use only approved platforms with school identities.
- Configure waiting rooms, lobby features and screen-sharing rules.
- Keep logs and recordings where approved, and never store student images or data on personal devices.

Records and evidence

- Keep risk assessments, control checks, attendance and supervision rosters, contractor and visitor logs, host verifications, image consent records, and post-incident reviews in approved systems.
- Link risk records to related incidents and improvements so we can see cause and effect.

Assurance and improvement

- **Monthly:** spot checks of supervision, room visibility and platform settings.
- **Termly:** audit of excursion and placement packs, volunteer and contractor compliance, and completion of classroom risk checks.
- **Annually:** review of the risk register, controls testing, and updates to the Child-Safe Action Plan.
- Dashboards track leading indicators, for example, training currency, Blue Card status, overdue risk reviews and time to triage concerns.

Escalation and risk acceptance

- If residual risk remains High after controls, the activity is paused and escalated to the Director.
- Only the Director can accept residual risk, and reasons must be documented with extra monitoring in place.
- Anyone can halt an activity immediately if they believe safety is compromised. Safety first, documentation next.

By applying these standards every day, we make child safety visible in our classrooms, programs, places, and online.

PART I - CHILD PROTECTION RESPONSE AND REPORTING OBLIGATIONS

We act fast, follow the law and keep clear records. If you are unsure, choose the safer option and seek advice from a Child Protection Officer the same day.

Immediate safety first

- **Separate and support the student.** Move to a safe space and arrange first aid or medical care.

- **Call 000** if there is imminent danger, serious injury, a weapon, a missing child or an immediate crime.
- **Preserve the scene and any devices or materials.** Do not ask leading questions. Do not promise secrecy.

Same-day intake and triage

- Tell a Child Protection Officer or the Executive Principal as soon as practicable, the same day..
- The Child Protection Officer confirms the legal pathway, checks conflicts of interest and starts the decision log.
- Record only factual observations and the student's words in plain English, with dates and times.

Choose the correct pathway.

Use the matrix below to determine what happens next. More than one pathway can apply.

Situation	External pathway	Internal pathway	Key notes
Reportable suspicion about significant harm	Report to Child Safety where mandatory reporting thresholds are met (CPA s.13E). Where the significant harm and parent tests are not both met, the Campus Principal may refer to Family and Child Connect (FaCC) with or without consent under the Child Protection Act. Options available to the Campus Principal under Chapter 5A of the Child Protection Act 1999 are: (a) offer support at the school level; (b) seek parental consent to refer to Family and Child Connect and then make the referral; or (c) refer a family to Family and Child Connect without consent (a principal-only power).	The Campus Principal and Executive Principal coordinate support	Mandatory reporters report as soon as reasonably practicable, the same day. If sexual abuse is also involved, see the EGPA pathway below - report to QPS immediately.
Suspected criminal offence	Queensland Police Service (QPS)	The Director of The Busy School Ltd (or delegate), in consultation with the Campus Principal, implements interim controls	Do not interview in a way that could prejudice police action
Allegation of reportable conduct by a worker of the school	Notify the Queensland Family and Child Commission (QFCC), where applicable	The Director of The Busy School Ltd (or delegate) manages or appoints an impartial investigator	Provide the QFCC notice immediately (within 3 business days) and progress updates within the required timeframes
Immediate life or health risk	000 emergency services	The Director of The Busy School Ltd (or	Prioritise safety over internal processes

		delegate)support the response	
Information needed by, or to be shared with, another agency to protect a child	relevant information sharing provisions, Information Exchange	Campus Principal, in consultations with the Child Protection Officer documents the decision and what was shared	Share the minimum necessary and record why
Allegation of harm caused by a teacher	Notify the Queensland College of Teachers (QCT) as soon as practicable after the investigation starts (Education (Queensland College of Teachers) Act 2005 ss.76-77).	Campus Principal, in consultation with the Executive Principal and the Director The Busy School Ltd, gives the required notice, including the teacher's name, the allegation, and the day the investigation started.	Maximum penalty 40 penalty units for failure to notify.
Online harm or harmful material	Queensland Police Service (QPS), if criminal, consider eSafety reporting where relevant.	ITS secures systems and preserves logs	Remove or restrict access quickly and keep evidence
Historical abuse disclosure	Queensland Police Service (QPS) and Child Safety, where required	Campus Principal ensures well-being supports	Treat with the same seriousness as current risk

Reporting sexual abuse at a non-state school

Section 366 of the Education (General Provisions) Act 2006 states that if a staff member becomes aware, or reasonably suspects, in the course of their employment at the school, that any of the following has been sexually abused by another person:

a) a student under 18 years attending the school;

b) a kindergarten aged child registered in a kindergarten learning program at the school;

c) a person with a disability who:

i. under section 420(2) of the Education (General Provisions) Act 2006 is being provided with special education at the school; and

ii. is not enrolled in the preparatory year at the school.

Where any worker becomes aware, or reasonably suspects, in the course of their engagement with TBS that a student under 18 has been sexually abused in connection with a TBS education setting or activity, the worker must act immediately and follow the statutory reporting pathway.

Internal step: the worker prepares a written report as soon as practicable, the same day, and provides it to the Campus Principal. If the allegation concerns the Campus Principal or involves a conflict of interest, the report is provided to the Executive Principal, Board Chair or a Director nominated by the Board.

External step: the Campus Principal (or the Executive Principal, Board Chair, or nominated Director where the Campus Principal is the subject) must provide a copy of the written report to Queensland Police Service immediately and to the Director of The Busy School Ltd. Where the Campus Principal is the first person to become aware of, or reasonably suspect, the sexual abuse, the Campus Principal must also give the Board a copy of the report immediately (EGPA s.366(2B)).

Failure by a staff member to give a written report about sexual abuse under section 366 carries a maximum penalty of 20 penalty units. Failure by a principal or director to report to the Queensland Police Service carries the same maximum penalty. There is no penalty for failure to report likely sexual abuse under section 366A.

Minimum particulars for the written report:

- name of the person making the report
- student's name and sex descriptor
- basis for the worker becoming aware, or reasonably suspecting, that the student has been sexually abused
- details of the abuse or suspected abuse, including when and where the concern arose and any immediate safety actions taken
- if known, the student's age
- if known, the identity of the person who has abused, or is suspected to have abused, the student
- if known, the identity of any other person who may have relevant information about the abuse or suspected abuse

The Campus Principal records the pathway decision, the time of reporting, and the Queensland Police Service reference number in the approved case management system (Folio).

Reporting likely sexual abuse at a non-state school

> *Section 366A of the Education (General Provisions) Act 2006 states that if a staff member reasonably suspects in the course of their employment at the school, that any of the following is likely to be sexually abused by another person:*
>
> *a) a student under 18 years attending the school;*
> *b) a kindergarten aged child registered in a kindergarten learning program at the school;*
> *c) a person with a disability who:*
>
> *i. under section 420(2) of the Education (General Provisions) Act 2006 is being provided with special education at the school; and*
>
> *ii. is not enrolled in the preparatory year at the school.*

Where any worker reasonably suspects, in the course of their engagement with TBS, that a student under 18 is likely to be sexually abused in connection with a TBS education setting or activity, the worker must act immediately and follow the statutory reporting pathway.

Internal step: the worker prepares a written report as soon as practicable, the same day, and provides it to the Campus Principal. If the allegation concerns the Campus Principal or a conflict of interest exists, the report is provided to the Executive Principal, Board Chair or a Director nominated by the Board.

External step: the Campus Principal (or the Executive Principal, Board Chair or nominated Director where the Campus Principal is the subject) must provide a copy of the written report to Queensland Police Service immediately.

Under Section 13E(3) of the *Child Protection Act 1999*, if a doctor, a registered nurse, a teacher or an early childhood education and care professional forms a 'reportable suspicion' about a child "in the course of their engagement in their profession", they must make a written report.

A **reportable suspicion** about a child is a reasonable suspicion that the child:

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

The doctor, nurse, teacher or early childhood education and care professional must give a written report to the Chief Executive (Queensland Department of Child Safety, Seniors and Disability Services) (or another department

administering the *Child Protection Act 1999*). The doctor, nurse, teacher or early childhood education and care professional should give a copy of the report to the principal.

Minimum particulars for the written report

a) name of the person making the report
b) the basis on which the person has formed the reportable suspicion
c) the child's name, age and sex descriptor
d) details of how to contact the child
e) details of the harm to which the reportable suspicion relates
f) particulars of the identity of the person suspected of causing the child to have suffered, suffer, or be at risk of suffering, the harm to which the reportable suspicion relates
g) particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates (See *Child Protection Regulation 2023 (Qld) s.4 "Information to be included in reports)*

The Campus Principal records the pathway decision, the time of reporting, and the Queensland Police Service reference number in the approved case management system (Folio).

Regional Report Contacts (Business Hours)	Phone
Brisbane and Moreton Bay	1300 682 254
Sunshine Coast and Central Queensland	1300 703 762
Far North Queensland	1300 684 062
South West (West Moreton): Ipswich	1800 316 855
North Coast	1300 703 921
North Queensland	1300 706 147
South East	1300 679 849
South West (Darling Downs) Toowoomba	1300 683 390
Child Safety After Hours Service Centre	1800 177 135

Mandatory reporting

- Teachers and other staff who meet the definition of a mandatory reporter under the Child Protection Act 1999 must report to the Queensland Department of Child Safety, Seniors and Disability Services (Child Safety) if they form a reportable suspicion about a child. This is done as soon as reasonably practicable, the same day. Where the reportable suspicion involves sexual abuse, the report must also be given to the Campus Principal immediately for reporting to Queensland Police Service immediately under the EGPA. The decision path is recorded for all reports.
- When applying the significant harm test and parent test to determine if a reportable suspicion exists, use the online Queensland Child Protection Guide in consultation with the Campus Principal.
- At The BUSY School, we require all staff to escalate concerns the same day. Mandatory reporters make the report, with support from a Child Protection Officer, through the Campus Principal.
- Record the reference number, the date and time of the report and the key points provided.

Criminal Code duties

The *Criminal Code Act 1899* includes two offences that pertain to the failure to report a child sexual offence and the failure to protect a child against a child sexual offence. A child sexual offence is an offence of a sexual nature by an adult against a child under 16 years or a person with an impairment of the mind.

Failure to Report

Under section 229BC of the Code, all adults must report to police, as soon as reasonably practicable, a belief that a child sexual offence is being or has been committed against a child who is under 16 years or a person with an impairment of the mind by another adult. Failure to make a report, without a reasonable excuse, is a criminal offence. This offence applies to all adults, including students 18 years or older, as well as parents/guardians and

volunteers at the school. A reasonable excuse not to make a report under the *Criminal Code Act 1899* includes that a report has already been made under the *Education (General Provisions) Act 2006* (reporting sexual abuse or likely sexual abuse) and the *Child Protection Act 1999* (reporting significant harm or risk of significant harm) as per this framework.

Failure to Protect

Under section 229BB of the Code, all adults in positions of power or responsibility within institutions to reduce or remove the risk of child sexual offences being committed must take reasonable steps to protect children in their care from a child sexual offence. A failure to protect is an offence.

Reporting tools and approved systems

All child safety concerns, disclosures and allegations must be recorded in approved school systems. Staff must not keep child protection notes, images or evidence on personal devices or in unapproved applications.

Every report or disclosure record must include date and time, who received it, what was said or observed (factual), immediate safety actions taken, pathway decision, external report details and reference numbers, and any interim controls applied.

The specific approved systems, form names, and evidence folder structures are maintained in Appendix C (Internal Assurance and Operational Detail).

Reporting inappropriate behaviour by a staff member

Under section 16 of the Education (Accreditation of Non-State Schools) Regulation 2017, the school must provide a process for students to report behaviour by a staff member that the student considers inappropriate. If a student considers that a staff member has behaved inappropriately, the student may report the behaviour to any of the following:

- a Child Protection Officer (CPO); or
- the Campus Principal.

A staff member who receives a student's report of inappropriate behaviour by another staff member must complete the school's reporting form, discuss the report with the Campus Principal, and keep appropriate records. If the inappropriate behaviour meets the threshold for any of the harm or abuse categories described in this framework, the relevant statutory reporting pathway applies as the priority.

The Campus Principal will interview the student, the staff member named in the report, and any other person who may have relevant information, and will take appropriate action. Records of the investigation and outcome are maintained in approved systems.

Reportable conduct notifications

- From 1 July 2026, the Queensland reportable conduct scheme as established by Chapter 3 of the *Child Safe Organisations Act 2024* (Qld) applies to The Busy School Ltd.
- For the purposes of the reportable conduct scheme, the *head of an entity* is the Director of The Busy School Ltd ('**the Director**').
- The Director must notify the Queensland Family and Child Commission about a reportable allegation about a worker of a reporting entity or a reportable conviction of a worker of a reporting entity. For the purposes of the Reportable Conduct Scheme, a *worker* includes a former worker of the entity if:
    - for a reportable allegation – the alleged conduct the subject of the allegation was engaged in during the period when the worker was performing work for the entity (even where the subject employee is no longer employed); or
    - for a reportable conviction – the worker was convicted during a period when the worker was performing work for the entity (even where the subject employee is no longer employed);.

- The Director must further provide progress updates in accordance with the scheme requirements and prescribed timeframes. These reports are as follows:
    - initial report within 3 business days of becoming aware of the allegation or conviction;
    - interim report within 30 business days after becoming aware of the allegation or conviction;
- final report as soon as practicable after the investigation is completed. The Director must facilitate an investigation into the reportable allegation or reportable conviction (Chapter 3, Division 3 of the Act) unless it is not reasonably able to investigate. In which case, the Director must notify the commission of the allegation or conviction and give the commission reasons why the Director can not reasonably investigate. This may be, for example, where the worker is no longer employed.
- The Director, or their delegate, appoints an impartial investigator who has no conflict of interest and the right skills. This investigator may be either an external investigator or internal investigator.
- Where Police or Child Safety are involved, the school coordinates sequencing so internal steps do not prejudice external inquiries.

Interim risk controls

- Put immediate controls in place to keep people safe. Examples include supervision changes, temporary duties, restricted access, contact conditions, communication protocols and suspension of employment (in accordance with any requirements under any applicable Award or Enterprise Agreement).
- Risk assessments regarding controls will be documented where deemed appropriate. The Queensland Family and Child Commission may provide input, assistance and guidance on appropriate risk controls in the circumstances of the case. Confirm controls in writing, set review dates and keep them proportionate to risk.

Trauma-informed engagement

- Where allegations involve a current student, it is important to give the student a calm, private and predictable space.
- Use open prompts such as “Tell me what happened” and allow the student to stop at any time.
- Offer support options and explain next steps in plain language.
- Use interpreters, support persons or cultural brokers where this will help the student feel safe.

Procedural Fairness & Natural Justice

- Workers who have an allegation against them (‘**Persons subject of an allegation**’) are entitled to procedural fairness and natural justice (including in accordance with any requirements under the relevant award or Enterprise Agreement). No adverse findings are to be made against a Person Subject of an Allegation until they have been given a proper opportunity to respond to the allegation.
- Persons subject of an allegation are to be given a letter setting out the allegations in advance of any interview with the investigator.
- Persons subject of an allegation are entitled to have a support person attend any interview or meeting related to the allegation (provided that the support person is not otherwise involved or connected with the matter, agrees to keep confidentiality and agrees to comply with any other reasonable requirement of the employer as directed from time to time).
- Persons subject of an allegation are entitled to respond to the allegations in writing.

Family communication

- Inform parents or carers of the subject child as soon as practicable, unless doing so increases risk or is not permitted by the Police or Child Safety.
- Share only what is necessary. Avoid details that could prejudice investigations.
- Offer a contact person and outline the support available.

Evidence handling and confidentiality

- Keep a contemporaneous decision log that records who decided what and why.
- Preserve digital evidence by securing devices, screenshots and system logs. Do not search a student's personal device.
- Store all records in approved systems with restricted access. Share information on a need-to-know basis only.
- Disclose information only in accordance with the obligations of the reporting entity pursuant to Chapter 4 of the *Child Safe Organisations Act 2024* (Qld).

Investigations

- The Director, or delegate, confirms scope, terms of reference and timelines.
- An investigator (either internal or external) is appointed. The investigator gathers documents, prepares letters of allegations where necessary, interviews relevant parties, assesses credibility and makes findings with reasons.
- The Person subject of the Allegation is to be given procedural fairness as set out in this framework.
- The Investigator is to prepare a report which:
    - sets out the factual findings. The standard of proof is the civil standard of balance of probabilities having regard to the principles in *Briginshaw* where allegations are of a serious nature. The *Briginshaw* principle does not create a new standard of proof but sets precedent for the proposition that the strength of evidence necessary to establish facts on the balance of probabilities may depend on the serious nature of what is sought to be proven (i.e. more serious allegations require stronger evidence).
- Sets out – based on the factual findings - whether the person subject of an allegation has engaged in *reportable conduct*. The investigator may make recommendations regarding any further action as a result of the findings – including disciplinary action or further training.
- The Director must prepare, and give to the commission, as soon as practicable after an investigation is completed, a report to the Queensland Family and Child Commission in accordance the *Child Safe Organisations Act 2024* (Qld).
- The Director decides outcomes, which may include disciplinary action, contract or control changes, referrals to regulators and system improvements. The Director, or delegate, may give the Person subject of an allegation an opportunity to respond to any proposed disciplinary action.
- The investigations must produce clear, well-reasoned findings for each allegation which are supported by evidence. For the purposes of the Reportable Conduct Scheme, there are four different findings that can be made:
    - Substantiated: There is sufficient evidence to find,on the balance of probabilities, the reportable conduct occurred (it is more likely than not);

- Unsubstantiated: The evidence suggests it is more likely than not that the alleged conduct did not occur.
- No outcome: In exceptional circumstances, it may not be possible to determine whether the reportable conduct was substantiated or unsubstantiated. Exceptional circumstances may include if the allegation is historical, and despite the investigator's best efforts, there is not enough evidence available or able to be collected to properly assess the allegation.
- Conduct outside the scheme: This finding should be used when the decision maker has investigated the conduct and, although the conduct occurred, the conduct does not meet the definition of reportable conduct under the Act.

- Regardless of the investigation's findings, a final risk assessment must be undertaken. This assessment, will inform any actions take or that are proposed ot be taken by the head of the reporting entity (See: The Queensland Government Reportable Conduct Scheme Guidelines).
- Where the allegation involves a registered teacher, the Director ensures any required notifications to the Queensland College of Teachers are made in accordance with applicable requirements, and records the notification details in the decision log.

Supports for students and others affected

- Offer timely supports such as counselling, safety planning, learning adjustments and communication arrangements.
- Put measures in place to prevent victimisation or retaliation.
- Review supports after key milestones, for example, after an interview, a return to class or a decision.

Closure, reporting and learning

- Close the matter when external requirements are met and internal actions are complete.
- From 1 July 2026, issue final reports for reportable conduct matters to the Queensland Family and Child Commission and any other regulator, as required by law.
- Debrief, capture lessons learned and update controls, training and templates.
- The Director provides de-identified assurance to the Board in line with governance reporting.

Time expectations

- **Same day:** triage, mandatory reports, Police contact where required, interim controls and decision log start.
- **Prompt regulator notifications:** where applicable, make notifications to Queensland Police Service (QPS), Child Safety and, from 1 July 2026, the Queensland Family and Child Commission, within required timeframes.
- **Regular updates:** keep affected parties informed as law permits until matters conclude.

Protections for people who speak up

- Good faith reporters are protected. Retaliation or victimisation is prohibited and may lead to disciplinary action.
- Concerns about detriment are managed quickly with practical remedies, for example, duty changes, communication protocols or restorative steps.
- Any eligible whistleblower will further be subject to the protections outlined in The Whistleblower Policy;

Quick checklist for all staff

1. Protect the student and call 000 if needed.
2. Tell a Child Protection Officer, Campus Principal or the Executive Principal the same day.
3. Write brief, factual notes with dates and times.
4. Follow direction on external reporting and do not investigate on your own.
5. Keep information confidential and store records in approved systems.

PART J - INFORMATION SHARING, PRIVACY AND RECORDS

The *Child Safe Organisations Act 2023* (Qld), Chapter 4, provides the legislative framework for the disclosure of information and confidentiality. In accordance with this Chapter, The Busy School Ltd may disclose confidential information to another prescribed entity (including the Queensland Family & Child Commission and/or another child safe entity as defined in section 46 of the Act) for any of the following purposes:

(a) To respond to a concern about a failure to implement or comply with the child safe standards or universal principle;

(b) To assist the commission in performing a function or exercising a power under chapter 2 of the Act (Child Safe Standards);

(c) To assist the commission in performing a function or exercising a power under chapter 3 of the Act (Reportable Conduct Scheme) by providing information about compliance with a requirement under chapter 2 by a reporting entity.

The *Child Safe Organisations Act 2023* (Qld), Chapter 4, Part 3, provides the legislative framework for the disclosure of information regarding the investigation (including the findings of the investigation) to relevant persons including (a) a child who is the subject of conduct that forms the basis of an investigation or reportable conviction or (b) a parent, person with parental responsibility or guardian of the child. The entity will always have regard to this legislation, as amended from time to time, when considering its disclosure obligations.

The *Child Safe Organisations Act 2023* (Qld), Chapter 5, provides the legislative framework for the confidentiality and protection of information, among other things, obtained through the administration of this Act. Penalties may apply to persons who unlawfully discloses confidential information obtained through involvement in the administration of the Act.

We handle information with care and purpose. We collect only what is needed, share only what is necessary to protect children or deliver education, and keep accurate records that show what happened, when, and why. We use approved systems, protect confidentiality, and cooperate with lawful requests from authorities. Our guiding rules

- **Student first:** Share information to protect safety and well-being, not for convenience.
- **Minimum necessary:** Provide only the details required for the purpose having regard to any "*permitted use"* for the making of a record, or disclosure, of confidential information (see *Child Safe Organisations Act 2023* (Qld), s 56(5).
- **Need to know:** Limit access to people who must act, supervise or decide.
- **Timely and accurate:** Record facts on the day, in plain English, with dates and times.
- **Secure by design:** Use approved platforms, strong access controls and secure storage.
- **Transparency:** Provide clear collection notices and, where appropriate, explain to students and families how information will be used.
- **Accountability:** Keep a decision log whenever information is shared externally or a report is made.

When we share information

Share information immediately when it is necessary to:

- protect a child or another person from risk of harm
- meet mandatory reporting duties or cooperate with the Police or the child protection authority
- respond to an allegation that may be reportable conduct
- support a student's safe learning, for example, health plans, supervision or reasonable adjustments
- comply with a court order, subpoena or other lawful requirement
- support a student's transition between schools or services.

Where consent is practicable and safe, obtain it. If seeking consent could delay urgent action or increase risk, share without consent using the minimum necessary and record why.

Who we may share with

- A child protection authority or the Police where risk or crime is suspected
- The children's guardian or other regulators when a reportable matter is being managed
- Health providers, well-being services or other schools to support a student's safety and learning
- Prescribed bodies under lawful information exchange frameworks
- Parents or carers, consistent with any court orders and safety plans or legislative frameworks;

What we do not share

- Unnecessary details or opinions unrelated to the safety or educational purpose
- Information about other students or family members who are not part of the decision
- Draft notes or messages stored on personal devices or in unapproved apps.

Handling sensitive and health information

- Mark health and other sensitive records as confidential and store them in restricted areas of the approved system.
- Share health plans and emergency actions with staff who need them to keep the student safe, for example, teachers, first aiders and excursion leads.
- Do not keep student images, videos or medical documents on personal devices.

Digital evidence and online safety

- Preserve relevant messages, screenshots, logs and files in the approved evidence folder.
- Do not search a student's personal device. If a device may contain evidence of a serious offence or child-safety risk, secure it and seek advice from the Executive Principal.
- Use school identities for video meetings and turn off private chat unless needed for accessibility, then keep logs.

Records we must keep

- Concern and incident notes, including the student's words where relevant
- Decision logs that show the pathway chosen, who decided, and why

- Copies of external reports or reference numbers
- Risk assessments, supervision plans and interim control decisions
- Communications with families and agencies
- Outcomes, supports provided and review points.

Record on the day, or as soon as practicable. Keep entries factual, respectful and free from unnecessary speculation.

Access, retention and disposal

- Access is role-based and reviewed regularly.
- Retention follows the school records schedule and applicable Queensland recordkeeping requirements, including education and child protection retention obligations under the Education (Accreditation of Non-State Schools) Regulations 2017 (Qld) and the Child Protection Regulations 2023 (Qld). We retain enrolment, attendance, health, safety and child protection records in approved systems.
- Disposal is secure and authorised. Keep a disposal log that identifies what was destroyed, when and by whom.

Working with separated families and court orders

- Check the student's record for current orders before sharing.
- Provide information in line with the orders and with the student's safety in mind.
- Escalate unclear situations to the Campus Principal or Head of School Administration (Privacy).
- Check the parties to the enrolment contract (i.e., who signed the enrolment contract on behalf of the student).

Third parties and external providers

- Use only approved platforms and providers.
- Ensure contracts include confidentiality, child-safety and record-return requirements.
- Verify identity and, where required, Working With Children Checks.
- Require external providers to return or upload all records to school systems and not retain student data beyond the contract purpose.

Data breach response

- Contain the issue, preserve evidence and notify the Head of School Administration (Privacy) and ITS Service Desk immediately.
- Record what happened, who is affected and the steps taken.
- Where required, inform affected individuals and relevant authorities and implement corrective actions.

Practical checklists

Before sharing

1. What is the safety or education purpose?
2. What is the minimum information needed?
3. Who specifically needs it?

4. Is consent appropriate and safe to seek now?
5. How will it be sent securely?
6. Have I started the decision log?

After sharing

1. Have I recorded what, when, with whom and why?
2. Do any controls, supports, or plans need updating?
3. Do parents or carers need an update that does not prejudice investigations?

By following these standards every day, we protect students' safety and dignity, meet our legal duties, and keep records that demonstrate sound decision-making and strong practice.

PART K - INTERFACE WITH COMPLAINTS AND ALLEGATIONS AND STUDENT CODE OF CONDUCT

This section routes concerns to the right place and ensures statutory child protection steps are never delayed. It creates a clear bridge between this framework and The BUSY School's accepted Feedback, Compliments and Complaints Handling Policy and Procedure as well as the Student Code of Conduct.

No wrong door, safety first

If anyone raises a concern with any staff member, we thank them, ensure the student is safe, and move the concern to the appropriate pathway the same day. If there is any indication of abuse, grooming, serious neglect, a crime, or staff reportable conduct, we immediately follow the Child Protection response and reporting obligations. General service issues, communication problems or decision reviews follow the Feedback, Compliments and Complaints Handling Policy and Procedure.

When the Feedback, Compliments and Complaints Handling Policy and Procedure apply

Use the Feedback, Compliments and Complaints Handling pathway for concerns about service quality, communication, facilities, administrative decisions, or day-to-day conduct that does not indicate risk of harm or reportable conduct. These matters are received, acknowledged, triaged, and resolved in accordance with the accepted Feedback, Compliments and Complaints Handling Policy and Procedure published by The BUSY School.

When the Child Protection pathway applies

Use the Child Protection pathway for any concern suggesting a child may be at unacceptable risk of significant harm, that a crime may have occurred, or that a worker of the school may have engaged in reportable conduct. Mandatory reporting, Police referral, and reportable conduct notifications take precedence. The complaints process pauses or is limited to issues that do not prejudice statutory processes. Records note the change of pathway and the reason.

How the pathways work together

- Parallel issues: One matter can raise both child safety and service concerns. Child Protection steps run first. The Complaints process resumes later for any remaining service issues.
- Single contact point: For non-safety matters, the Complaints Officer (Head of School Administration) is the contact. For child safety matters, the Child Protection Officer, Campus Principal or the Executive Principal is the point of contact. Handover is documented, so people do not need to repeat their story.
- Anonymous and third-party reports: We accept them. We act on the information available and, where possible, provide a safe contact channel for updates.

Service standards and expectations

- We acknowledge complaints as soon as practicable, explain next steps and indicative timeframes, and aim to provide outcomes within standard timeframes for most matters. Where statutory child protection processes apply, we follow those timelines first and keep parties updated as permitted by law.
- We apply procedural fairness, provide access supports such as interpreters, and prohibit retaliation or victimisation against anyone who speaks up.

Records, privacy and evidence

- Child protection matters: start a decision log immediately, capture external report references, store in the restricted child protection area, and limit access to those who need to act.
- Complaints matters: record intake, triage, plan, evidence considered, outcome letter, actions, and any review in the secure complaints register, coded for trend analysis.
- For both pathways, share the minimum necessary information, protect identities, and keep all records in approved systems.

How to access the Feedback, Compliments and Complaints Handling Policy and Procedure

The Feedback, Compliments and Complaints Handling Policy and Procedure are available on the school website and at reception. They set out how to lodge a complaint, expected timeframes, review options and any external avenues, including contact points for regulatory queries. This Child Protection and Child Safe Framework directs all non-safety issues to those documents and fills the gap on when and how child safety allegations are handled first.

The Student Code of Conduct - Unsafe Behaviour from Students

The Busy School Ltd Student Code of Conduct serves to provide a safe, respectful and disciplined learning environment for students and staff, where students have opportunities to engage in quality learning experiences, acquire values supportive of their lifelong wellbeing and establish a pathway to future employment and/or training.

The Student Code of Conduct is designed to facilitate high standards of expectations and behaviours of students – to ensure all students feel safe and well cared for. As set out in the Student Code of Conduct, major behaviours of concern (including, for example, major violent physical assault or sexual assaults) may result in suspension/withdrawal from the school including exclusion. Each case is managed individually and may not lead to the same outcomes for students – in some cases outcomes will be restorative. To ensure the safety of the TBS community, serious incidences that occur outside of school hours may also impact a student's enrolment.

The Campus Principal, or delegate, will ensure that Risk Assessments document the Risks of further unsafe behaviour from students who have been involved in substantiated allegations of Major Behaviours as per the Student Code of Conduct.

Where appropriate, and in accordance with any Risk Assessment, the Campus Principal will report major unsafe behaviours to the Queensland Police Service. It is noted separately that the 'failure to report' provisions in section 229BC of the *Criminal Code* apply to any sexual offence committed by an *adult* (including a student over 18 years of age) to a child under 16 years of age (or a child with an impairment).

PART L - PROGRAM COMPLIANCE, REVIEW AND IMPROVEMENT

We check that our child safety system works in practice, not just on paper. TBS follows a predictable assurance cycle, closes gaps quickly, and demonstrates outcomes with clear evidence.

Compliance anchors

All reviews and actions under this section align with:

- Non-State Schools Accreditation Board (Queensland) guidance and program guidelines

- Education (Accreditation of Non-State Schools) Act 2017 (Qld)
- Education (General Provisions) Act 2006 (Qld)
- Child Safe Organisations Act 2024 (Qld)
- Family and Child Commission Act 2014 (Qld)
- Working with Children (Risk Management and Screening) Act 2000 (Qld)
- Child Protection Act 1999 (Qld)
- Criminal Code Act 1899 (Qld)
- Work Health and Safety Act 2011 (Qld)
- Privacy Act 1988 (Cth) and Australian Privacy Principles
- Information Privacy Act 2009 (Qld)
- Privacy Act 1988 (Cth)
- Hospital and Health Boards Act 2011 (Qld) (confidentiality provisions)
- Online Safety Act 2021 (Cth)
- Anti-Discrimination Act 1991 (Qld)
- Disability Discrimination Act 1992 (Cth)
- Disability Standards for Education 2005 (Cth)
- Education (Queensland College of Teachers) Act 2005 (Qld)
- Reportable Conduct Scheme – Guidelines.

Roles and decision rights

- Director sponsors the assurance program, approves the annual plan, accepts any residual High risks and confirms regulator notifications are on time.
- Head of School Administration designs the assurance plan, completes or commissions audits, issues dashboards and tracks corrective actions to closure.
- Campus Principals own findings for their site, fix issues on time and certify monthly status.
- Child Protection Officers, People and Culture, ITS, Facilities and Head of Teaching, Training and Learning provide evidence, complete control tests and support improvements.
- Board receives de-identified reports twice yearly and challenges progress.

Assurance activities

TBS conducts a structured program of assurance activities across monthly, termly, and annual cycles. These include campus compliance checks, targeted file audits, controls testing, training assurance, thematic reviews, and an annual management review. We track a small set of leading indicators including training currency, Blue Card status, triage timeliness, regulator notification compliance, and decision log quality. When performance drops below target, corrective actions are logged and monitored to closure.

We classify findings, assign owners and due dates, verify closure, and sample again the following term. After-action reviews follow significant incidents, and student, family, and staff voice feeds the Action Plan.

The detailed assurance cadence, metrics, thresholds, findings classifications, and evidence specifications are maintained in Appendix C (Internal Assurance and Operational Detail), which is available to regulators on request.

External readiness

- We keep current evidence for the Non-State Schools Accreditation Board, Independent Schools Queensland guidance (where relevant), Queensland Police Service (QPS), Child Safety and, from commencement, the Queensland Family and Child Commission.
- We respond promptly to any regulator inquiry and use feedback to strengthen practice.

Continuous improvement loop

1. Plan, publish and resource the assurance program.
2. Test controls, check files and listen to students, families and staff.
3. Fix what we find, verify the fix and update guidance and training.
4. Report progress to the Director and the Board.
5. Reset priorities in the Child-Safe Action Plan.

By regularly testing our system, acting on evidence, and closing the loop, we ensure that child safety is not only promised but proven in everyday practice.

PART M - TRAINING, COMMUNICATION AND PUBLIC AVAILABILITY

We build capability, keep messages clear and make our child safety standards visible. Everyone at TBS knows what to do, where to look and how to get help.

Compliance anchors

This section is delivered in line with:

- Non-State Schools Accreditation Board (Queensland) guidance and program guidelines,
- Reportable Conduct Scheme – Guidelines;
- Education (Accreditation of Non-State Schools) Act 2017 (Qld); Education (General Provisions) Act 2006 (Qld),
- Child Safe Organisations Act 2024 (Qld); Family and Child Commission Act 2014 (Qld),
- Working with Children (Risk Management and Screening) Act 2000 (Qld),
- Child Protection Act 1999 (Qld),
- Criminal Code Act 1899 (Qld),
- Work Health and Safety Act 2011 (Qld),
- Privacy Act 1988 (Cth) and Australian Privacy Principles,
- Information Privacy Act 2009 (Qld),
- Hospital and Health Boards Act 2011 (Qld) (confidentiality provisions),
- Online Safety Act 2021 (Cth),
- Anti-Discrimination Act 1991 (Qld),
- Disability Discrimination Act 1992 (Cth),
- Disability Standards for Education 2005 (Cth),
- Education (Queensland College of Teachers) Act 2005 (Qld), and
- Spam Act 2003 (Cth).

Who we train and how often

All employees, including casuals and temporary staff, complete child protection training at onboarding and annually. This covers the Child Protection Code of Conduct, boundaries, same-day reporting, mandatory reporting, reportable conduct, online safety, records and privacy, and student voice. Volunteers, contractors and external

providers complete induction before engagement and refresh annually for regular roles. Leaders, Child Protection Officers, and investigators complete role-specific advanced training on appointment and annually. Students receive age-appropriate information at the start of each year and at orientation. Parents and carers are informed at enrolment and after key updates.

The detailed training matrix, minimum content requirements, evidence standards, and completion tracking are maintained in Appendix C (Internal Assurance and Operational Detail).

What good training looks like

- Short, plain English modules that use real scenarios from classrooms, excursions, VET and online settings.
- Clear do and do not lists that staff can apply the same day.
- Role-specific simulations for leaders, CPOs and investigators.
- Micro refreshers during the year, for example, five-minute prompts at staff meetings.
- Recorded webinars and quick reference guides stored on the intranet.

Records and assurance

- We record completion in the learning system the same day.
- Campus Principals verify 100 per cent completion each term for campus-based roles.
- The Head of School Administration issues a dashboard each term that shows completion, quiz pass rates and any overdue people.
- Staff who miss training are removed from child-facing duties until they complete it.

Communication standards

- We publish clear contact points for Child Protection Officers and the Executive Principal on noticeboards and the website.
- We use school platforms for messages, respect privacy, and provide translations or interpreters when needed.
- We provide student-friendly versions of key messages, using accessible formats and plain language.
- We close the loop on significant updates with a summary of what changed and what staff, students or families need to do.

Public availability

- The Child Protection and Child Safe Framework, the Child Safety Commitment Statement and the Child Protection Code of Conduct are published on the website, are available at reception and can be provided in accessible formats on request.
- We keep current versions online with version numbers and dates, and we remove superseded copies from public pages.
- We provide a simple online reporting option for students and families, with an anonymous channel.
- We display posters that show help-seeking pathways in student spaces and staff rooms.

Accessibility and inclusion

- We design materials that students can understand, including options with captioning, large print and screen reader-friendly formats.

- We provide culturally safe communications, and we adjust training for staff working with students who have disability or high-risk medical needs.
- All materials are reviewed for inclusive language and practical relevance.

After training, what changes in practice

- Staff can explain the Code and the reporting steps without prompts.
- Concerns are triaged the same day and logged correctly.
- Supervision, online settings and records match the standards in this framework.
- Students and families know how to get help and see that speaking up leads to action.

Continuous improvement

- We update training and public materials after incidents, audits or law changes.
- We test understanding with spot checks and scenario discussions.
- Feedback from students, families, and staff informs the next release of materials.

Version	Date effective	Approved by	Changes
1.0	June 2026	TBS QLD Board of Directors	• Consolidated Child Protection Policy, Child Risk Management Strategy, and Reporting Concerns of Harm and Abuse Policy into a single, unified framework • integrated child safety risk management strategy requirements and strengthened alignment of screening, reporting, escalation and recordkeeping controls • minor editorial refinements for clarity, consistency and audit-readiness.

APPENDIX A: CHILD-SAFE ACTION PLAN

TBS maintains a live Child-Safe Action Plan that converts compulsory Queensland Child Safe requirements and legislation into practical, time-bound actions. The Director holds overall accountability for the plan, which assigns clear owners, due dates, success metrics, and evidence requirements to every action. Implementation is supported by the Executive Principals, operationally owned by the Head of School Administration, and led at a campus level by each Campus Principal.

The plan covers eight streams aligned to the Queensland Child Safe Standards: leadership, culture and child-friendly information; people screening, capability and supervision; participation and empowerment of children and families; complaints, concerns and statutory reporting; physical and online environments; programs, excursions, VET, work placements and camps; third-party providers, contractors, volunteers and visitors; and records, information sharing and privacy.

TBS keeps one master plan and a campus plan for each site. We update it after audits, incidents, feedback or law changes. The plan is reviewed at monthly campus check-ins, termly prioritisation meetings, and twice-yearly Board reports.

The detailed Action Plan, including compliance anchors by stream, year-one priority actions, evidence library specifications, metrics dashboard, and campus alignment templates, is maintained in Appendix C (Internal Assurance and Operational Detail) and is available to regulators upon request.

APPENDIX B: QUICK GUIDE FOR STAFF

This is the practical, take-action summary for everyone at TBS. If in doubt, act for safety first, then seek advice.

Your first 10 minutes

1. **Protect the student.** Move to a safe space, and arrange for first aid or medical help if needed.
2. **Call 000** for imminent danger, serious injury, a weapon, a missing child or an immediate crime.
3. **Listen and note.** Use plain, open prompts such as “Tell me what happened.” Do not probe for detail. Do not promise secrecy.
4. **Inform** a Child Protection Officer or the Executive Principal as soon as practicable, the same day.
5. **Record** brief, factual notes with dates, times, names and the student’s words where relevant in the approved system.

Who to contact

- **Child Protection Officer (CPO):** same-day intake and triage.
- **Director of The Busy School Ltd:** reportable conduct decisions, Police and regulator notifications.
- **After-hours:** use the published on-call number. If not immediately available and the risk is urgent, call 000 and leave a message for the Executive Principal or Director of the Queensland School.

Pathway in one glance

- **Reportable suspicion about significant harm?** Make or support a mandatory report the same day.
- **Possible crime?** Contact the Police immediately.
- **Allegation about a staff member, contractor or volunteer?** Notify the Campus Principal of reportable conduct management (the Campus Principal will notify the Director).

- **Service issue with no safety risk?** Use the Feedback, Compliments and Complaints Handling Policy and Procedure.

Do and do not

Do

- Act quickly, stay calm and use child-friendly language.
- Keep interactions observable and interruptible.
- Share on a need-to-know basis only.
- Start a decision log if you make or support a report.

Do not

- Investigate on your own or interview witnesses.
- Search a student's person or personal device.
- Delay external reporting while you gather more information.
- Promise outcomes or confidentiality you cannot give.

Working with the student

- Thank them for speaking up. Explain what will happen next in plain English.
- Offer a support person and a quiet space.
- Stop the conversation if they are distressed and seek help from a CPO.

Communicating with families

- The Executive Principal will advise who contacts parents or carers and when.
- Do not share details that could increase risk or prejudice Police or statutory processes.
- Keep notes of what you told them and any support offered.

Handling evidence and digital material

- Preserve relevant messages, screenshots, emails and logs in the approved evidence folder.
- Do not copy student images or files to personal devices.
- If a device may contain evidence of a serious offence, secure it and seek direction from the Executive Principal. Do not explore the contents.

Interim safety controls

- Follow directions on supervision changes, contact conditions, timetable adjustments or restricted access.
- Keep controls proportionate and review them as the situation changes.

Records you must create the same day

- Brief incident note with date, time, place, who was involved and what you observed or were told.
- Any external report reference numbers and who made the report.
- Any immediate controls put in place and by whom.
- Any communications with the student, family or agencies.

If the allegation is about you

- Step away from any direct contact with the student.
- Tell the Campus Principal immediately and follow directions.
- Do not contact the student or family about the matter.

Common scenarios and the next step

Scenario	Your next step	Why
Student discloses abuse at home.	Contact Campus Principal the same day and support a mandatory report	Protect the student and meet legal duties
Harmful online threat involving a student	Inform Campus Principal, preserve screenshots, and consider the Police	Safety and evidence preservation
Allegation that a staff member groomed or harmed a student	Tell the Campus Principal immediately	Reportable conduct pathway applies
Severe bullying with self-harm risk	Contact Campus Principal now, document, and consider a mandatory report	Reportable suspicion may be present
Parent unhappy with a decision, no safety risk	Use Feedback, Compliments and Complaints Handling Policy and Procedure	Service issue to be resolved fairly

If you are unsure

Choose the safer pathway, contact Campus Principal or the Executive Principal the same day and document what you did and why.

Five non-negotiables to remember

1. Safety first, then documentation.
2. Same-day reporting to a Campus Principal or the Executive Principal.
3. No solo investigations.
4. Need-to-know information sharing only.
5. Keep clear, dated records in the approved system.