



Townsville Independent School Association Inc.
Enkindle Village School

Student Protection Processes

Processes about the conduct of staff and students and responses to harm, under section 16 of the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)

Version	1	Adopted	20 July 2026
Status	Issued	Document owner	The Board

Document control

Policy Domain	Child Safety — Statutory Compliance
Document Title	Student Protection Processes
Purpose	To record the school's written processes about how the school responds to harm, or allegations of harm, to students under 18 years, and about the appropriate conduct of the school's staff and students, as required by section 16 of the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld).
Scope	All students of Enkindle Village School, and all staff of the school and TISAI, including paid employees (full-time, part-time, permanent, fixed-term and casual), contractors, volunteers, and persons undertaking work experience or vocational placements.
Supersedes	Child Protection Policy (Version 5, July 2025) and Student Protection Reporting Procedure. This document consolidates and replaces both.
Authorised by	TISAI Board Chair
Operational Owner	Principal
References	Education (Accreditation of Non-State Schools) Regulation 2017 (Qld), section 16; Education (General Provisions) Act 2006 (Qld), sections 364, 366 and 366A; Education (General Provisions) Regulation 2017 (Qld), sections 68 and 69; Child Protection Act 1999 (Qld), sections 8, 9, 10, 13E and 13G; Child Protection Regulation 2023 (Qld), section 4; Criminal Code Act 1899 (Qld), sections 229BB and 229BC; Child Safe Organisations Act 2024 (Qld); Education (Queensland College of Teachers) Act 2005 (Qld), section 76; Working with Children Check Act 2000 (Qld).
Related documents	Child Safe Standards Compliance Statement; Reportable Conduct Scheme — School System and Process; Child and Youth Risk Management Strategy; Complaints Handling Policy and Procedure; Information Management Policy; Child Safety at Our School — A Guide for Families and the School Community.

Review Date	Annually, and on any material change to the legislation referenced above or to the school's operations
Next Review Date	20 July 2027
Policy Owner	TISAI Board

1. Purpose

This document records the school's written processes about:

- how the school will respond to harm, or allegations of harm, to students under 18 years; and
- the appropriate conduct of the school's staff and students,

as required by section 16(1) of the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) (the Accreditation Regulation).

It consolidates and replaces the school's Child Protection Policy (Version 5, July 2025) and Student Protection Reporting Procedure. It is read with the Child Safe Standards Compliance Statement and the Reportable Conduct Scheme — School System and Process, which the Board adopted on 15 June 2026, and with the Child and Youth Risk Management Strategy made under the Working with Children Check Act 2000 (Qld).

2. Application

This document applies to all students of the school, and to all staff, defined for this document to include paid employees (full-time, part-time, permanent, fixed-term and casual), contractors, volunteers, and persons undertaking work experience or vocational placements. It applies to all premises and activities under the school's supervision.

3. Definitions

Child. Under section 8 of the Child Protection Act 1999 (Qld), a child is an individual under 18 years.

Harm. Under section 9 of the Child Protection Act 1999 (Qld), harm to a child is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect, or by sexual abuse or exploitation, and can be caused by a single act, omission or circumstance, or by a series or combination of acts, omissions or circumstances. Section 16(7) of the Accreditation Regulation adopts this meaning.

Child in need of protection. Under section 10 of the Child Protection Act 1999 (Qld), a child who has suffered harm, is suffering harm, or is at unacceptable risk of suffering harm, and who does not have a parent able and willing to protect the child from the harm.

Sexual abuse. Under section 364 of the Education (General Provisions) Act 2006 (Qld), in relation to a relevant person, includes sexual behaviour involving the relevant person and another person where the other person bribes, coerces, exploits, threatens or is violent toward the relevant person; where the relevant person has less power than the other person; or where there is a significant disparity between them in intellectual capacity or maturity.

Reportable suspicion. Under section 13E of the Child Protection Act 1999 (Qld), a reasonable suspicion that a child has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse, and may not have a parent able and willing to protect the child from the harm.

Harm other than physical or sexual abuse. Harm within the meaning of section 9 arising other than from physical or sexual abuse — including psychological or emotional abuse and neglect. Section 8 of this document sets out how the school responds to harm of this kind.

4. Conduct of staff and students

All staff must ensure that their behaviour towards, and relationships with, students reflect proper standards of care for students. Staff must not cause harm to students. Students are expected to treat other students and staff with respect and must not cause harm to another student.

The standards of conduct expected of staff are set out in the school's Code of Conduct and in the Child Safe Standards Compliance Statement. Conduct by a staff member that may amount to reportable conduct under Chapter 3 of the Child Safe Organisations Act 2024 (Qld) is dealt with under the Reportable Conduct Scheme — School System and Process, in addition to the processes in this document.

5. Reporting inappropriate conduct of a staff member

5.1 Who a student may report to

A student who considers the behaviour of a staff member to be inappropriate may report that behaviour to any of the following:

- **Chris Pulling, Principal**
- **Jessica Hay, Forest School Leader** — Student Protection Contact
- the Townsville Independent School Association Inc, the school's governing body, at committee@tisai.com.au

Each of the staff members named above is a current employee of the school. The names are confirmed at each annual review of this document and whenever a named person ceases to hold the role, and are displayed for students on the Child Safety Officers poster in the school's common areas.

A student may make a report in person, in writing, or through a parent, carer or another staff member. No particular form is required, and a student is not required to put a report in writing.

5.2 How a report is dealt with

A staff member who receives a report of inappropriate conduct must:

- listen to the student respectfully, and not question the student beyond what is necessary to understand the concern;
- ensure the student is safe and supported before taking any other step;
- record the report in writing on the day it is received, in the student's words so far as practicable; and

- give the record to the Principal immediately. Where the report concerns the Principal, the record is given immediately to a director of the governing body.

The Principal, or the director where the report concerns the Principal, determines what further action is required, which may include action under the Reportable Conduct Scheme, the school's Complaints Handling Policy and Procedure, a report under section 6 or section 7 of this document, or the response in section 8. The student and, where appropriate, the student's parent or carer are told what action has been taken, to the extent that telling them does not prejudice an investigation or place any person at risk.

6. Reporting sexual abuse and likely sexual abuse

6.1 Sexual abuse — section 366

Under section 366 of the Education (General Provisions) Act 2006 (Qld), if a staff member becomes aware, or reasonably suspects, in the course of their employment at the school, that a student under 18 years attending the school, a kindergarten aged child registered in a kindergarten learning program at the school, or a person with a disability who under section 420(2) of that Act is being provided with special education at the school and is not enrolled in the preparatory year, has been sexually abused by another person, the staff member must give a written report about the abuse or suspected abuse to the Principal or to a director of the governing body immediately. The Principal or director must immediately give a copy of the report to a police officer.

Where the first person to become aware or to reasonably suspect is the Principal, the Principal must give a written report to a police officer immediately and must also give a copy to a director of the governing body immediately.

6.2 Likely sexual abuse — section 366A

Under section 366A of the Education (General Provisions) Act 2006 (Qld), if a staff member reasonably suspects in the course of their employment at the school that any of the persons described in section 6.1 is likely to be sexually abused by another person, the staff member must give a written report about the suspicion to the Principal or to a director of the governing body immediately, and the Principal or director must immediately give a copy to a police officer. Where the first person to form the suspicion is the Principal, the Principal must report to a police officer immediately and give a copy to a director of the governing body.

6.3 Particulars required

A report under section 6.1 must include the name of the person giving the report, the student's name and sex, the basis for becoming aware or reasonably suspecting, details of the abuse or suspected abuse, and, where known, the student's age, the identity of the person who has abused or is suspected of abusing the student, and the identity of anyone else who may have information (Education (General Provisions) Regulation 2017 (Qld), section 68). A report under section 6.2 must include the equivalent particulars for a suspicion of likely abuse (section 69 of that Regulation).

Reporting under this section is immediate. Immediate means without delay, and does not permit waiting for a convenient time, for corroboration, or for the Principal to become available — where the Principal is not available, the report is made to a director of the governing body.

7. Reporting a reportable suspicion

Under section 13E of the Child Protection Act 1999 (Qld), a doctor, a registered nurse, a teacher or an early childhood education and care professional who forms a reportable suspicion about a child in the course of their engagement in their profession must give a written report to the chief executive of the department administering that Act. A copy of the report is given to the Principal.

The report must include the basis on which the reportable suspicion was formed; the child's name, age and sex descriptor; details of how to contact the child; details of the harm to which the suspicion relates; particulars of the identity of the person suspected of causing the harm; and particulars of the identity of any other person who may be able to give information about the harm (Child Protection Act 1999 (Qld), section 13G(2)(a); Child Protection Regulation 2023 (Qld), section 4).

8. Responding to harm other than physical or sexual abuse

This section applies to information alleging harm, or a risk of harm, to a student under 18 years that does not arise from physical or sexual abuse — including psychological or emotional abuse and neglect, whether caused by a single act, omission or circumstance or by a series of them. Harm arising from physical or sexual abuse is dealt with under sections 6 and 7. The school deals with information of this kind compassionately and fairly, so as to minimise any likely harm to the extent it reasonably can.

8.1 Receiving the information. A staff member who receives information of this kind, or who forms a concern of this kind, records it in writing on the day the concern arises and gives it to the Principal. Where the concern relates to the Principal, it is given to a director of the governing body. A parent, carer, student or member of the community may raise a concern of this kind directly with the Principal or with a Student Protection Contact named in section 5.1.

8.2 Immediate welfare of the student. Before any other step, the staff member ensures the student is safe and supported, and arranges first aid, a safe space or other immediate assistance where it is needed. Emergency services are contacted on 000 where the student is in immediate danger.

8.3 Assessment by the Principal. Within two school days of receiving the information, the Principal assesses and records: whether the information indicates harm within the meaning of section 9 of the Child Protection Act 1999 (Qld); whether the student may be a child in need of protection within the meaning of section 10 of that Act; whether a report to Child Safety is required or appropriate; whether the conduct of a staff member is involved, in which case sections 4 and 5 and the Reportable Conduct Scheme also apply; whether any other reporting obligation in section 10 of this document is triggered; and what support the student requires.

8.4 Reporting to Child Safety. Where the Principal reasonably suspects that the student has suffered, is suffering, or is at unacceptable risk of suffering significant harm, and may not have a parent able and willing to protect the student from the harm, a report is made to Child Safety Regional Intake Services using the contacts in section 11. A report about harm of any kind may be made to Child Safety whether or not a mandatory reporting obligation applies, and any person may make such a report directly at any time. Nothing in this document prevents or delays a person from doing so.

8.5 Support for the student. The school puts in place the support identified in the assessment, which may include adjustments to the student's school day, contact with the parent or carer unless doing so would place the student at risk, referral to wellbeing or counselling services, and a date on which the adequacy of the support is reviewed.

8.6 Records and reporting to the Board. The information received, the assessment, the decisions made and the reasons for them, any report made to Child Safety, and the support provided are

recorded and held in accordance with the school's Information Management Policy. The Principal reports each matter to the governing body, de-identified where appropriate.

8.7 Where a concern is not substantiated. The school records the outcome and the reasons for it, advises the person who raised the concern that the matter has been dealt with, and continues to monitor the student's wellbeing.

9. Support for students

A student who makes a report, and a student who is the subject of a report, is supported throughout. Support may include a nominated staff member as a point of contact, adjustments to the student's day, referral to wellbeing or counselling services, and contact with the parent or carer unless doing so would place the student at risk. No student is disadvantaged for having made a report in good faith.

10. Interaction with other obligations

A report under one obligation does not satisfy another. The Principal assesses each matter against the following and acts on each as required:

- **Reportable Conduct Scheme.** Where the matter involves conduct of a worker that may be reportable conduct, the Reportable Conduct Scheme — School System and Process applies, including notification to the Queensland Family and Child Commission.
- **Queensland College of Teachers.** Under section 76 of the Education (Queensland College of Teachers) Act 2005 (Qld), the Principal reports to the College any investigation into an allegation of harm caused, or likely to be caused, to a student by the conduct of a relevant teacher at the school.
- **Failure to report — section 229BC, Criminal Code.** All adults must report a belief that a child sexual offence has been committed against a child by an adult to police as soon as reasonably practicable. A report already made under sections 6 or 7 of this document is a reasonable excuse.
- **Failure to protect — section 229BB, Criminal Code.** Adults in a position of responsibility within the school must take reasonable steps to protect children in their care from a child sexual offence.
- **Blue Card Services.** Where a matter affects a person's eligibility to hold a working with children clearance, it is reported to Blue Card Services, and the person is dealt with under the Child and Youth Risk Management Strategy and the Working with Children Check Act 2000 (Qld).
- **NSSAB.** Where a matter affects the school's accreditation status, these processes, or any other condition of accreditation, it is reported to the Non-State Schools Accreditation Board.

11. Contacts

- Emergency — 000
- Queensland Police Service (non-urgent) — Policelink 131 444
- Child Safety After Hours Service Centre — 1800 177 135
- Child Safety Services Enquiries Unit — 1800 811 810
- Townsville Investigation and Assessment Child Safety Service Centre — 71–77 Patrick Street, Aitkenvale QLD 4814 — (07) 4796 6400
- Townsville North and Hinchinbrook Child Safety Service Centre — Level 8, 445 Flinders Street, Townsville QLD 4810 — (07) 4796 6502
- Townsville South and Burdekin Child Safety Service Centre — Level 2, 187–209 Stanley Street, Townsville QLD 4810 — (07) 4796 6200
- Townsville West and Charters Towers Child Safety Service Centre — 39 Blackhawk Boulevard, Thuringowa Central QLD 4817 — (07) 4796 6300
- Queensland Family and Child Commission — reportable conduct notifications

12. Awareness, accessibility and training

The school informs staff, students and parents of these processes, and publishes them on the school website (section 16(4)(a) of the Accreditation Regulation). Awareness is maintained through the school website, newsletters, announcements in the school management system, staff induction, student whole circles, enrolment material, and on request from the school administration.

These processes are accessible on the school website and available on request from the school administration (section 16(4)(b)).

The school trains staff in these processes on induction and refreshes that training annually (section 16(4)(c)). Training currency is recorded for each person on the school's People Register, which flags an overdue or approaching due date daily and escalates it until it is cleared. Training records include attendance registers, staff meeting records and induction records.

13. Implementation and audit

The school audits its compliance with these processes annually (section 16(4)(d)). The audit covers whether reports were recorded and dealt with as required, whether reporting obligations were met and within time, whether the named contacts in section 5.1 remain current, whether staff training is current, and whether the published copies on the school website match the current version. The Principal reports the outcome to the Board, and the Board records its consideration in the minutes.

14. Complaints about non-compliance

A person may allege that the school has not complied with these processes. Such an allegation is dealt with as a complaint under the school's Complaints Handling Policy and Procedure (sections 16(5) and 16(6) of the Accreditation Regulation). A complaint may be made to the Principal or, where it concerns the Principal, to the governing body at committee@tisai.com.au.

15. Records

Records made under this document are confidential and are held in accordance with the school's Information Management Policy. Access is limited to those who need it to discharge a function under this document or another statutory obligation. Records are retained for the period required by law and are not destroyed while a matter remains open or while a regulator has an active interest in it.

16. Authority and status

This document is issued by, and may only be amended by, the TISAI Board. It takes effect from the date of authorisation recorded in the metadata above and remains in force until superseded by a subsequent Board resolution.

Printed copies of this document are uncontrolled. Currency can only be assured at the time of printing. The current version is held by the Secretary of TISAI and the Principal, and published on the school website.

17. Revision history

Version 1.0 — adopted 20 July 2026. Initial issue. Consolidates and replaces the Child Protection Policy (Version 5, July 2025) and the Student Protection Reporting Procedure.