Screening and Blue Card Management Procedure

Section 1 - Purpose and Scope

Purpose

(1) This Procedure outlines how The University of Queensland (UQ) fulfils its obligations for the screening and management of prescribed notices (Blue Card / Exemption Card) for staff, students, and volunteers who are engaged in regulated business or regulated employment ('regulated activities') under the Working with Children (Risk Management and Screening) Act 2000 (the Act).

(2) This Procedure should be read in conjunction with the Risk Management Strategy for Working with Children, Working with Children Policy, Volunteers Policy, and other relevant UQ policies and procedures.

Scope

(3) This Procedure supports staff with responsibilities for regulated activities that require effective risk management and screening of staff, students, and volunteers (UQ Person) who will be involved in regulated activities as outlined under the Act. This may include:

a. activities controlled by UQ that involve UQ persons working with children, other than those activities that are part of UQ's core learning and teaching that are exempt under the Act; and
b. activities facilitated by UQ Organisational Units for UQ students undertaking Work Integrated Learning (WIL) or Work Experience (WE) placement that may involve working with children.

(4) As a registered higher education institution under the Tertiary Education Quality and Standards Agency Act 2011 (Cth), UQ's core learning and teaching activity falls under exemption provisions with regard to Working with Children (Risk Management and Screening) Act 2000 (Qld). These core activities of UQ are not considered regulated business, and are outside the scope of this Procedure.

Section 2 - Process and Key Controls

(5) UQ will take reasonable steps to ensure that the process for screening and Blue Card management meets compliance obligations under the Act. Key controls include:

a. Upholding the Queensland Government's 'No Card No Start' policy.
b. Identifying and undertaking risk assessment of regulated activities that are being undertaken under the auspices of UQ and managing those activities in accordance with the Risk Management Strategy.
c. Screening and undertaking identity (ID) checks of staff, students, and volunteers involved in regulated activities and maintaining records in approved Institutional and Blue Card Registers.
d. Effectively managing and administering prescribed notices and notifications from Blue Card Services (BCS) through implementation of BCS Organisation Portal accounts.
e. A requirement for all UQ Persons to immediately notify their Manager or Supervisor of any material change in their circumstances that may impact their eligibility to engage in regulated activities, which may include

negative notices (Blue Card / Exemption Card), or other material change in circumstances. UQ Persons should immediately refrain from engagement in regulated activities until the matter has been resolved and they have been granted express permission to re-commence engagement in regulated activities by their Manager or Supervisor.

(6) The screening and risk management process will ensure that:

a. There is central oversight and support for UQ staff using BCS Organisation Portal Accounts, with UQ Named Contacts, and nominated Portal Administrator / Portal Users in place to effectively support organisational units to manage and process Blue Cards (including linking / delinking of UQ persons engaged in regulated activities).
b. UQ will take immediate steps to prevent or remove a UQ Person from regulated activities, where there are changes in their circumstances that legally restrict or disqualify them from such engagement, or where there are reasonable substantiated grounds or concerns that may require UQ to take such action to protect a child from harm.
c. Information, guidance, and training is made available to UQ staff, students, and volunteers in relation to their regulatory obligations and UQ requirements when engaged in regulated activities involving work with children.
d. Annual monitoring, review and enhancement of screening and Blue Card management processes and checking of Institutional Registers to ensure processes and systems are effective, and records are up to date.

Section 3 - Key Requirements

No Card No Start

(7) The No Card No Start laws:

a. mean staff, students or volunteers must have a Blue Card before they can work with children (from 31 August 2020, a pending application is no longer sufficient); and
b. require organisations to take reasonable steps to ensure the Blue Card belongs to the card holder and link them to their organisation before engaging them in regulated activities involving working with children.

(8) It is an offence under the Act for:

a. a disqualified person to apply for a Blue Card; or
b. a restricted person to start or continue working or volunteering in restricted employment.

Regulated Activities

(9) The Head of Organisational Units that are undertaking regulated activities must ensure compliance with the obligations under the Act and the UQ Risk Management Strategy for Working with Children.

(10) Staff responsible for planning and implementing regulated activities at UQ (including events, projects, ongoing business processes and services) involving work with children will normally be required to hold a Blue Card (or valid exemption).

(11) A record of regulated activities must be maintained and stored securely. The details of all UQ persons involved in regulated activities are recorded in the Institutional Register, and Blue Card / Exemption Card holders are linked/delinked to the relevant Original organisational account (Blue Card Register).

(12) The Institutional Register will be stored with associated risk assessment of the regulated activity, where required, that have been signed off by the relevant Heads of Organisational Units.

Screening

(13) The screening process for UQ persons engaged in regulated activities is undertaken to ensure that there is oversight of the individuals involved and their capacity to follow UQ policies, procedures and other controls, including those established through the UQ Risk Management Strategy for Working with Children, and other Standard Operating Procedures (SOP) that may apply.

(14) Managers and Supervisors with responsibility for a regulated activity must:

a. ensure that all UQ Persons involved in regulated activities are screened prior to their commencement in the activity. This includes:
    i. undertaking identity checks and ensuring Blue Card (or valid exemption) requirements are identified and actioned in accordance with the No Card No Start policy and the UQ Risk Management Strategy for Working with Children.
    ii. checking that the individuals have the requisite capacity and knowledge of the relevant UQ policies and procedures, the UQ Risk Management Strategy for Working with Children, and other related SOP.
b. liaise with the relevant UQ Organisation Portal Administrator (PA), Portal Users (PU), and/or the UQ Named Contact (NC) to ensure that current Blue Card holders and Blue Card applicants are linked (and delinked) to UQ Blue Card Register(s) in the relevant Blue Card Organisational Portal, prior to their engagement in regulated activities.

Frequency Test

(15) Under the Frequency Test, if a person is not engaged in the regulated activity for more than 7 days in a calendar year, they may not need to hold a Blue Card. Refer to the current guidance on the BCS website when applying the Frequency Test.

(16) The Frequency Test cannot be used for:

a. a restricted person; or
b. a business operator.

(17) Where a determination is made that a UQ Person does not need to hold a Blue Card by applying the Frequency Test, this must be recorded in the relevant Institutional Register.

(18) There are particular regulated activities that will require a UQ person to hold a Blue Card, where the Frequency Test cannot be applied. This will be informed by guidance and advice from BCS, and may for example occur where UQ Persons are engaged in regulated activities where third-party policy, or an agreement with UQ, requires a UQ person to hold a Blue Card.

Identity Checks

(19) Managers and Supervisors with responsibility for a regulated activity are required to take reasonable steps to check the identity of all UQ persons engaged in regulated activities.

(20) Portal Administrators and Portal Users will normally use two reference points to confirm a person's identity prior to linking them to an Organisation Portal Account, this may include:

a. sighting of the person's original driver's license, passport, Blue Card, or other Transport and Main Roads (TMR) approved evidence of ID; and
b. confirmation of ID through single sign on access (authenticated by UQ), such as requests submitted through verified UQ email accounts, UQ smart form requests, or requests submitted through authenticated UQ systems

(e.g., SI-net, InPlace, or HCMS); or

c. checking of personal information (Name and DOB) held in UQ's staff or student systems with information held by BCS (Blue Card Reference / Blue Card Account Number).

(21) ID checks are undertaken when linking a Blue Card holder or applicant to the relevant UQ Portal Account, prior to commencement in regulated activities, and at any other time where UQ may have reasonable grounds to conduct an ID check to ensure the safety of children and other UQ stakeholders.

UQ Organisation Portal

(22) UQ uses online Organisation Portal Accounts provided by BCS to manage Blue Card / Exemption Card holders and applicants engaged in regulated activities under the auspices of UQ.

(23) UQ adopts a distributed approach to the management and administration of these Organisation Portal Accounts with centralised monitoring, support and assurance to ensure that operational and regulatory requirements are satisfied. A number of approved Organisation Portal Accounts are held to support UQ's needs, including accounts allocated to:

a. UQ Schools, Centres, Institutes, and Central Organisational Units to manage student Blue Cards (including student placements); and
b. UQ Faculties, Divisions, Institutes, Centres, and Central Divisions to manage staff and volunteer Blue Cards.

> Link: Organisation Portal Account Login

(24) Each Organisation Portal Account has:

a. a Named Contact that may receive direct queries and disclosures from BCS, including notifications of negative notices and other sensitive disclosures in relation to linked records or applicants;
b. a nominated Portal Administrator (PA) that is responsible for day-to-day management of the account including maintaining the Blue Card Register and the Institutional Register, and processing of Blue Cards; and
c. a number of Portal Users (PU) that support the Portal Administrator in the effective administration/processing of Blue Cards and the Blue Card and Institutional Register.

(25) Positive notices from BCS will normally be sent to a common or nominated (Portal Administrator) email account and distributed to stakeholders as needed (linking/delinking of Blue Card and applicants).

(26) BCS issue Portal Account access to individual UQ staff. These account details are confidential and should be stored securely by the individual and not be shared anyone, including login credentials to the BCS Portal Account.

(27) All information accessed through the Portal Account must be managed in accordance with the Privacy Policy and Procedure.

Blue Card Register and Employee Register

(28) UQ is required to hold Institutional Register(s) (referred to as 'Employee Register' under the Act) that contain information of all UQ persons engaged in regulated activities undertaken under the auspices of UQ.

(29) The nominated Portal Administrators are responsible for ensuring that an Institutional Register is maintained, in the approved format, for each Organisation Portal account under their remit. The Institutional Registers will include;

a. information imported from the Blue Card Register(s) in the Organisation Portal Accounts; and

b. additional information, collected from Managers and Supervisors responsible for regulated activities, with details of all others (non-blue card /exemption holders) that are engaged in regulated activities.

(30) The Institutional Registers will be submitted to the Academic Registrar and Chief Human Resources Officer for monitoring and review twice per year, or upon request as may be required from time to time.

Negative Notices and Disqualifications

(31) BCS will normally inform both the individual (applicant) and the UQ Named Contact(s) for the relevant Organisation Portal Account(s) if the outcome of their Blue Card / Exemption Card application is negative. BCS will contact the individual where a change in circumstances leads to disqualification of the individual from working with children.

(32) A UQ Person who receives a negative notice or is disqualified cannot undertake regulated activities working with children. A UQ Person that is disqualified must inform UQ immediately and remove themselves from all engagement in regulated activities.

Staff

(33) The Named Contact and/or staff member that has received disclosure of a negative notice or disqualification must inform the Chief Human Resources Officer. The Chief Human Resources Officer will consider the staff member's suitability in their current role and advise the staff member how this will affect their ongoing employment.

Students

(34) The Named Contact and/or student that has received disclosure of a negative notice or disqualification must inform the relevant UQ Head of School. The Head of School, in consultation with the relevant Faculty, will discuss if there are any alternative study options or alternate pathways with the student that may enable them to complete their studies.

Volunteers

(35) The Named Contact and/or volunteer that has received disclosure of a negative notice or disqualification must inform the relevant Head of Organisational Unit. The Head of Organisational Unit will advise the volunteer how this will affect their volunteering activities and opportunities with UQ.

Blue Card Holders/Applicants

Responsibility

(36) Each individual Blue Card holder/applicant is personally responsible for ensuring that their Blue Card application/renewal is completed to avoid any unnecessary delays to their commencement in regulated activities. This includes timely renewal of Blue Cards and submission of new applications (allowing for a minimum six-week processing timeframe) to avoid a breach of the No Card No Start law.

(37) There are circumstances that may prevent a person from applying and receiving a Blue Card. UQ persons are encouraged to speak with their Manager, Supervisor, or Placement Coordinator at the earliest opportunity, and prior to lodging an application, if there are any concerns about eligibility or status with regard to restricted employment or other possible disqualifying offences.

Applying for a Blue Card and Blue Card Payments

(38) Individuals must submit their Blue Card/Exemption Card application to BCS through the online applicant portal. For further information refer to the BCS Applicant Portal.

Link: Blue Card Services Login

Students and Volunteers

(39) When the applicant has a registered Blue Card account (applicant portal), the account number must be submitted to the nominated UQ receiving officer with a request to be linked to the relevant organisational portal account. UQ will undertake the relevant checks and link the student or volunteer Blue Card applicant so that they can complete their Blue Card application.

(40) There is no fee for Blue Card applications for students and volunteers.

Staff

(41) The applicant can send a request to the nominated UQ receiving officer to be linked to the relevant UQ Portal Account when they have a registered Blue Card account number, or after they have received their positive notice (Blue Card or Exemption Card) and reference number.

(42) UQ will undertake the relevant identity checks and link the staff member to the relevant organisational portal account.

(43) Where UQ is making the payment on behalf of a staff member, the staff member must have set up and verify their online Blue Card account and be linked to the relevant organisational portal account before UQ can process the payment through the organisational portal account.

(44) See summary of the application process in Schedule 1.

Section 4 - Roles, Responsibilities and Accountabilities

Role/Area Responsible	Roles, Responsibilities and Accountabilities
Head of Organisational Unit	• Approval of regulated activities under the Working with Children (Risk Management and Screening) Act 2000 (the Act) undertaken within their organisational unit, including signing off Risk Assessments. • Implementation of the UQ Risk Management Strategy for Working with Children. • Maintain oversight of the Blue Card management of volunteers who engaged in regulated activities with children. • Reporting to Compliance Owners.
Managers, Supervisors, and Coordinators	• Assess and record regulated activities. • Complete Risk Assessments of High Risk regulated activities. • Ensure screening and identity checks is undertaken of all UQ Persons involved in regulated activities. • Identify and resolve training and support needs for UQ persons engaged in related activities.
UQ Named Contacts	• Point of Contact for BCS to receive queries or concerns in relation to linked blue card holder's or applicant's status. • Ensure timely follow up and actioning where any risks have been identified internally or by BCS in relation to a linked Blue Card holder or applicant in liaison with relevant UQ stakeholders. • Liaise with the Portal Administrator to ensure compliant use of Portal Accounts. Note: where appropriate, the Named Contact and Portal Administrator responsibilities may be fulfilled by one person.

Role/Area Responsible	Roles, Responsibilities and Accountabilities
Portal Administrators	• Day-to-day management of the account and overseeing processing (ID Checking and linking/delinking/payment) of Blue Cards as needed. • Oversight and management of Portal Users and the assigned Organisation Portal account(s). • Ensure that Institutional Registers and Blue Card Registers (Organisation Portal) are monitored and kept up to date.
Portal Users	• Support the Portal Administrator in the day-to-day processing (ID Checking and linking/delinking/payment) of Blue Cards as needed. • Support the Portal Administrator to ensure that Institutional Registers and Blue Card Registers (Organisation Portal) are maintained and kept up to date.
Academic Registrar	• Provide assurance and reporting on the implementation and effectiveness of this Procedure. • Maintain oversight of the Blue Card management of students, including on placement, who engage in regulated activities with children. • Approve material changes to Organisation Portal Accounts.
Chief Human Resources Officer	• Provide assurance and reporting on the implementation and effectiveness of this Procedure. • Maintain oversight of the Blue Card management of staff who engage in regulated activities with children. • Approve material changes to Organisation Portal Accounts.
Staff, students and volunteers	• Hold and maintain a current Blue Card / Exemption Card (positive notice) for engagement in regulated activities • Abide by: ♦ UQ Risk Management Strategy for Working With Children ♦ UQ Staff Code of Conduct Policy ♦ Related UQ procedures and SOP for Working With Children ♦ UQ Student Code of Conduct Policy (students) ♦ UQ's Program Requirements (students).

Section 5 - Monitoring, Review and Assurance

(45) The Academic Registrar and Chief Human Resources Officer have central responsibility for oversight, monitoring, reporting, and assurance of regulated activities conducted under the auspices of UQ, including support, guidance, and training to ensure capacity and compliance with relevant obligations.

(46) The Named Contacts and Portal Administrators are responsible for monitoring, reviewing and providing assurance on the effectiveness of this Procedure under the direction of the Chief Human Resources Officer and Academic Registrar.

Section 6 - Recording and Reporting

(47) The Chief Human Resources Officer and Academic Registrar will report annually to the Institutional Champion, and the Vice-Chancellor's Risk and Compliance Committee on the effectiveness of this Procedure.

Section 7 - Appendix

Term	Definition
Act	Working with Children (Risk Management and Screening) Act 2000
Blue Card	Evidence that a positive notice has been issued by Blue Card Services to the cardholder following criminal history screening to determine their eligibility to work with children.

Term	Definition
Blue Card Register	Centrally held Blue Card Register containing details regarding Portal Administrators and Portal Users, as well as details relating to students on placement that require a Blue Card. This is an internal UQ register not linked to the BCS Organisational Portal.
Child	A person under the age of 18.
Institutional Champion	The Deputy Provost is nominated as the UQ champion for working with children to support the enhancement of an institutional wide culture that values, respects, and protects the rights of children.
Institutional Register	Register or registers maintained by UQ with details of all UQ persons (staff, students, volunteers) that are engaged in regulated activities, working with children. The Act refers to the register as an Employee Register
No Card No Start	Queensland Government requirement that a No Card No Start policy be maintained in the organisation for all persons engaged in regulated activities. This means a person cannot commence regulated activities until they hold a current Blue Card/Exemption Card (Positive Notice).
Organisation Portal Account	An account accessible by the organisation on the Blue Card Services Organisation Portal which is an online system that allows organisations to manage their Blue Card obligations and records.
Portal Account	Refers to a Blue Card Services Organisation Account allocated to a UQ Organisational Unit. For details of UQ Portal Accounts Contact UQ Human Resources Division (askhr@uq.edu.au).
Portal Administrator	The primary person within the relevant Organisational Unit (e.g. Faculty/School) who has access to, and responsibility for managing, the Organisation Portal Account. This person can view all information and undertake all tasks within the Organisation Portal, including providing access to other users as needed.
Regulated Activity	Activities undertaken by staff, students or volunteers that are classified as regulated business or regulated employment under the Working with Children (Risk Management and Screening) Act 2000(Qld, 'the Act') and Working with Children (Risk Management and Screening) Regulation 2020 (Qld).
Restricted Employment	Situations or exemptions that allow a person to work with children without a Blue Card. Examples include if the person is: a volunteer parent; a volunteer who is under 18; paid or unpaid staff who work in regulated child-related employment for not more than 7 days in a calendar year; or a consumer at a child-related service outlet where they also carry out work at the outlet.
Restricted Person	A restricted person is a person who either; has, a) been issued a negative notice, b) has a suspended Blue Card, c) is a disqualified person; or d) has been charged with a disqualifying offence that has not been finalised.
Student	Currently enrolled student undertaking study at UQ.
Supervisor/Coordinator	The person who is accountable for the supervision and arrangements of the staff, student or volunteer who is required to hold a current Blue Card. In most cases this will be the Manager or student Coordinator.
UQ Person(s)	Staff, students and volunteers that are engaged in regulated activities undertaken under the auspices of UQ that triggered obligations under the Act.
Volunteer	A person who donates their services in a voluntary capacity to UQ without expectation of remuneration. Volunteers may include those undertaking work on fundraising and community-oriented projects, tertiary students wishing to gain exposure to particular UQ functions, among others. Volunteering is time willingly given for the common good and without financial gain.
Work Experience (WE)	An arrangement undertaken by a student under which an organisation will provide experience to the student as part of the student's education, but not as a mandatory or assessable part of a student's course, shorter form credential or program. Work Experience is regulated under the Education (Work Experience) Act 1996(Qld) and is subject to specific restrictions and conditions. The University of Queensland expects that the work-based learning opportunities will provide greater educational benefit for the student than operational benefit for the Host Organisation. The University of Queensland should authorise the arrangement in advance.

Term	Definition
Work Integrated Learning (WIL)	Learning experiences that explicitly integrate theory with practice within a purposefully designed curriculum to foreground employability. WIL must be either assessable by The University of Queensland (for credit) or otherwise a requirement of an academic course, shorter form credential or program. For Higher Degree by Research (HDR) students, WIL opportunities must be unrelated to the HDR project thesis and authorised as a requirement of the program by the Dean, Graduate Research School.
Work with Children (WWC)	Activity that involves work/working with children and young people, being people under the age of 18.

Section 8 - Schedule

Schedule 1: Summary of the Blue Card Application Process

(48) Register an online Blue Card Account (BCS Applicant Portal):

a. Using QGov account and your Customer Reference Number (CRN) issued by Department of Transport and Main Roads (TMR) to verify your identity.
b. Volunteers and Students do not need to pay for their Blue Card.
c. Staff have to apply for a paid Blue Card.
d. Blue Card Holders have to be linked to UQ (Portal Account) before they can commence working with children (WWC) – No Card No Start Policy in Queensland.

> Notice to Applicants:
>
> It is an offence for a 'disqualified person' to sign and lodge a Blue Card application or a renewal application.
>
> A Restricted Person must not Engage in Restricted Employment.

(49) For Staff:

a. Register Blue Card Account (BCS Applicant Portal).
b. *[Applicant makes payment and submits application]*.
c. Send Blue Card Account No. (or Blue Card Reference No.) to UQ Portal Administrator or Portal User.
d. Portal Administrator/User conducts ID check and links person to UQ Portal Account (using BC Account/Reference No. and DOB).
e. *[UQ make payment through UQ Portal Account and Applicant submits application]*
f. BCS review application (normally processed within 5 working days):
    i. Positive Notice (Blue Card or Exemption Card) – commence engagement WWC;
    ii. Negative Notice – No Card No Start.
g. When person completes engagement WWC UQ Portal Administrator/User delinks them from UQ Portal Account(s).

(50) For Students and Volunteers:

a. Register Blue Card Account (BCS Applicant Portal)
b. Send Blue Card Account No. to UQ Placement Coordinator/Administrator, Portal Administrator, or Portal User.

c. Portal Administrator/User conducts - ID check and links person to UQ Portal Account (using BC Account No and DOB).
d. Applicant completes and submits the application.
e. BCS review application (normally 5 working days):
    i. Positive Notice (Blue Card or Exemption Card) - commence engagement WWC;
    ii. Negative Notice – No Card No Start.
f. When person completes engagement WWC UQ Portal Administrator/User delinks them from UQ Portal Account(s).

Status and Details

Status	Current
Effective Date	10th February 2025
Review Date	20th July 2026
Approval Authority	Director, Governance and Risk
Approval Date	10th February 2025
Expiry Date	Not Applicable
Policy Owner	Phil Vaughan Chief Human Resources Officer
Enquiries Contact	Human Resources Division