

## CHILD SAFE RISK MANAGEMENT POLICY AND PROCEDURE

<b>Approving authority</b>	School Council
<b>Purpose</b>	This Policy and Procedure has been developed to ensure that Ozford College appropriately identifies and mitigates the risks of child abuse in all school environments and to meet the Victorian Child Safe Standards and Ministerial Order 1359 Managing The Risk Of Child Abuse In Schools And School Boarding Premises.
<b>Responsible Officer</b>	Principal and Academic Director
<b>Associated documents</b>	Child Safety Policy and Procedure Child Safety Code of Conduct Policy and Procedure Contractor and Consultant Policy and Procedure Critical Incident Policy and Procedure Diversity, Cultural safety and Equity Policy and Procedure Human Resources Policy and Procedure Mandatory Reporting Policy and Procedure Responding to and Reporting Allegations of Suspected Child Abuse Policy and Procedure Student Support and Services Policy and Procedure Student Complaints and Appeals Policy and Procedure Younger Students and Homestay Policy and Procedure Record Management Policy and Procedure

### 1. RATIONALE

This Policy and Procedure has been developed to ensure Ozford has appropriate child safe risk management strategies that:

- focus on preventing, identifying and mitigating risks related to child safety and wellbeing in the school environment; and
- take into account the nature of the school environment, the activities expected to be conducted in those environments (including the provision of services by contractors or outside organisations), and the characteristics and needs of all children and students expected to be present in those environments.

Ozford's child safety risk management strategies have been developed and implemented using a formal and structured approach to the effective management of the risks associated with child safety.

This policy should be read in conjunction with the College Risk Management Policy and Procedure.

### 2. SCOPE

This Policy and Procedure applies to:

- the governing body members, the School Council
- staff directly engaged or employed
- contracted staff ie. contracted service provider whether or not a body corporate or any other person is an intermediary) engaged to perform child-related work
- volunteers
- parents
- students; and
- the wider community.

This Policy and Procedure applies to all Ozford school environments. School environments means any of the following physical, online or virtual places, used during or outside school hours:

- A campus of the school;
- Online or virtual school environments made available or authorised by the school governing authority for use by a child or student (including email, intranet systems, software applications, collaboration tools, and online services); and
- Other locations provided by the school or through a third-party provider for a child or student to use including, but not limited to, locations used for:
  - camps;
  - approved homestay accommodation;
  - delivery of education and training such as registered training organisations, TAFEs, non-school senior secondary providers or another school; or
  - sporting events, excursions, competitions or other events.

### 3. POLICY

- 3.1 The College has zero tolerance to child abuse and is committed to the protection and wellbeing of all children in its school environments. Ozford is committed to provide a child safe environment where children and young people are safe and feel safe, and their voices are heard about decisions that affect their lives.
- 3.2 The College develops and implements risk management strategies that:
- focus on preventing, identifying and mitigating risks related to child safety and wellbeing in the school environment; and
  - take into account the nature of the school environment, the activities expected to be conducted in those environments (including the provision of services by contractors or outside organisations), and the characteristics and needs of all children and students expected to be present in those environments.
- 3.3 The College acknowledges that risk is the effect of uncertainty on objectives :
- An effect is a deviation from the expected - positive and/or negative.
  - Objectives can have different aspects (such as financial, health and safety, and environmental goals) and can apply at different levels (such as strategic, organisation-wide, project, product and process).
  - Risk is often characterised by reference to potential events and consequences or a combination of these.
  - Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated likelihood of occurrence.
- 3.4 The College's risk management processes will enable school staff and volunteers to identify and mitigate risks in school environments without compromising a child or student's right to privacy, access to information, social connections and learning opportunities. Staff are specifically responsible for identifying and for managing risk within their areas of responsibility.
- 3.5 Where the **Senior Management Team**, identifies risks of child abuse occurring in the school environment, the College makes a record of those risks and the actions that are taken or will be taken to reduce or remove the risks (risk controls and risk treatments).

- 3.6 As part of the risk management strategy and practices, the **School Council** monitor and review the risks related to child safety and wellbeing annually, including evaluating the effectiveness of the implementation of the identified risk controls.
- 3.7 The child safe risks identified by the College will be recorded on the Child Safe Risk Register.
- 3.8 The Child Safe Risk Register will be reviewed by the **Senior Management Team** annually. The purpose of the review will be to identify any new or emerging risks, gauge the effectiveness of risk management as a whole and of specific controls for critical activities and risks. The Risk Register and any proposed changes will then be reviewed by the **School Council**.
- 3.9 As required by Ministerial Order 1359 Managing The Risk Of Child Abuse In Schools And School Boarding Premises, this policy is reviewed after any significant child safety incident, or at least every two years, and improved where applicable.
- 3.10 This policy has been based on:
- AS/NZS ISO 31000-2009 Risk management - Principles and guidelines
  - the Victorian Department of Education and Training (DET) Guidance materials and website resources;
  - the Commission for Children and Young People (CCYP) website resources
  - the Victorian Regulation and Qualifications Authority (VRQA) website resources;
  - the Victorian Department of Children, Youth and Families website resources; and
  - the Victorian Department of Justice and Community safety fact sheets and website information.
  - The Ozford Institute of Higher Education policies and procedures
  - Consideration of feedback from staff, students and their families collected through surveys.

#### 4. **PROCEDURE**

- 4.1 The College risk management process has the following components:
- The **School Council** members are trained in child safety and made aware of the child safe risks in the College environments.
  - Child Safe Risk Reviews to confirm the currency of the risk profile and identify any new or emerging child safe risks.
  - The identified child safe risks are assessed to establish the risk likelihood and consequence ratings and an overall risk rating.
  - Responsible staff identify, develop and implement internal controls to manage the risks; and
  - The College monitors and reviews the process to ensure the currency of the Child Safe Risk Management approach.
- 4.2 All **School Council** members and staff are trained in their responsibilities and obligations. The guidance and training covers:
- individual and collective obligations and responsibilities for managing the risk of child abuse including:

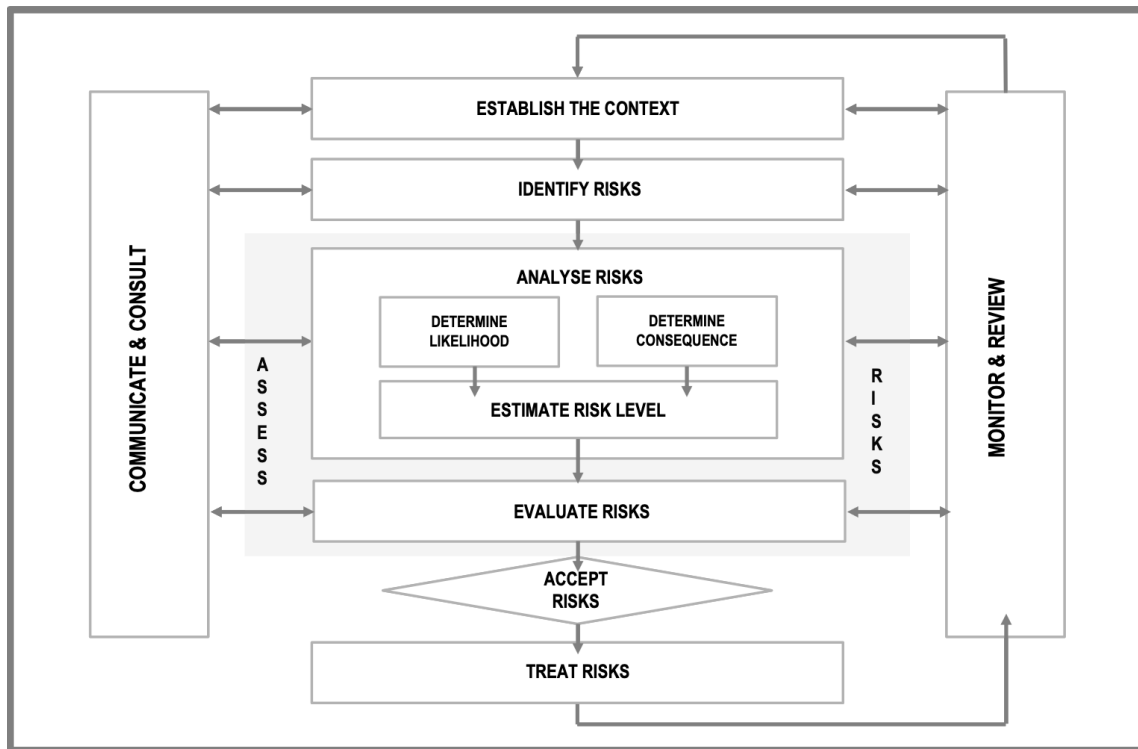
- the school's strategy and approach to implementation of the child safe standards
    - guidance on responding effectively to issues of child safety and wellbeing and supporting colleagues who disclose harm
    - guidance on how to build culturally safe environments for children and students
    - guidance on their information sharing and recordkeeping obligations
  - child safety and wellbeing risks in the school environment including:
    - guidance on how to identify and mitigate child safety and wellbeing risks in the school environment without compromising a child or student's right to privacy, access to information, social connections and learning opportunities
    - guidance on recognising indicators of child harm including harm caused by other children and students
  - the College's child safety policies, procedures and practices
- 4.3 The **Senior Management team** annually conducts a risk assessment that is consistent with its risk management framework as set out in Appendix 1 and includes:
- reviewing the existing child safe risk register for currency
  - consulting with staff to compile a list of new and arising child safe risks
  - reviewing any child safe incidents for any new risks
  - considering child safe incidents in the school sector more broadly identified through networks or media
  - considering child safe information and resources made available by the VRQA and CCYP.
- 4.4 The outcome of the risk assessment will be an updated lists of child safe risks. The identified risks will be analysed and evaluated in terms of the possible consequences and the likelihood of the risk occurring to establish an overall risk rating.
- 4.5 In consultation with staff, the **Senior Management Team** will establish or review the control and mitigation actions for each risk and allocate appropriate staff with risk oversight and management responsibility.
- 4.6 The outcomes from the risk assessment will be recorded in the Child Safe Risk register, how the College plans to control these risks and who has oversight of and responsibility for risk management activity.
- 4.7 The **Senior Management Team** will annually review the risk register to ensure that it includes all child abuse risks, ie. the risk assessment process set out in this section will be followed.
- 4.8 The **School Council** will monitor the effectiveness of the controls annually as part of the risk assessment process and after any significant child safety incident.

## 5. FEEDBACK

Feedback or comments on this Policy and Procedure is welcomed by the listed responsible officer.

## APPENDIX 1 RISK MANAGEMENT FRAMEWORK

The Risk Management Process is based upon an internationally accepted standard: ISO 31000:2018, Risk management – Guidelines, as shown below:



The above illustration is detailed within the key steps of the Risk Management framework below:

### Communicate and consult

Ongoing communication and consultation with all involved parties to ensure understanding of the process and its intended outcomes are performed by senior management. This involves collating reports for presentation to the School Council; facilitating ongoing operational reviews of risk registers, coordinating risk assessments for specific projects and ongoing advice and support to ensure compliance with this Risk Management Framework.

### Establish context

Risk management takes place within the strategic objectives of the College and has both a strategic and operational context encompassing the secondary school operations.

### Strategic Context

Strategic risk identification involves the relationship between the College and the broad external environment/community. A range of issues is considered in examining the strategic content, including:

- opportunities and threats associated with the local, regional, state and global economic, social, political, cultural, environmental, regulatory and competitive environments;
- key thrusts of stakeholder strategies; and,
- strengths and weaknesses of the Institute in attaining corporate objectives.

## Operational Context

Operational risk identification involves gaining an understanding of the College's capabilities, goals, objectives, strengths and weaknesses by considering:

- organisational structure and culture;
- geographics/demographics;
- the identity and nature of interaction with key stakeholders;
- the existence of any operational constraints;
- objectives and key performance indicators;
- business resilience vulnerabilities;
- relevant issues relating to recent change management risk, performance or audit reviews;
- relevant stakeholder community concerns or requirements;
- regulatory and contractual requirements and constraints; and,
- business management systems.

## Risk identification

Identifying risk involves compiling a list of risks which may impact on the College. Activities include:

- reviewing previous incident reports;
- undertaking internal audits and inspections to determine potential exposure;
- discussing activities at planning meetings; and,
- keeping accurate and complete records.

## Analyse Risk

Analysing risk in terms of the possible consequences and the likelihood of the risk occurring. Activities include:

- using a risk register and action plan to assist in this process;
- establishing the level of consequence of the risk occurring;
- establishing the likelihood of the risk occurring; and,
- seeking expert advice if required.

The Risk Assessment Matrix provides guidance for analysing risks:

Consequence	Likelihood				
	Almost Certain	Likely	Possible	Unlikely	Rare
Extreme	Extreme	Extreme	Extreme	High	Moderate
Major	Extreme	Extreme	High	Moderate	Moderate
Moderate	High	High	Moderate	Moderate	Low
Minor	High	Moderate	Moderate	Low	Low
Insignificant	Moderate	Moderate	Low	Low	Low

## Evaluate Risks

Assessing the level of the risk and determining whether it is within acceptable parameters. Activities include:

- using a risk register and action plan to assist in this process;
- establishing priority levels;
- determining the frequency and potential severity of potential losses; and,

- discussing with management teams.

## **Treat Risk**

The process of responding to risk involves developing an action plan for the treatment of risks assessed as non-acceptable, determining the person/area of responsibility with the task of implementing the action and the implementation itself.

Actions include:

Risk Treatment Options	
<b>Avoid the risk.</b>	Remove the risk source. Change of process or procedure. Don't start or continue with the activity/program.
<b>Accept the risk.</b>	Consider the risk appetite and determine the impact of the risk and whether it is acceptable to the Institute.
<b>Take a risk.</b>	Evaluate the risk vs reward in pursuing an opportunity.
<b>Change the likelihood.</b>	Reduce the probability of the risk occurring.
<b>Change the consequence.</b>	Reduce the severity of the impact that the risk may create.
<b>Share the risk</b>	Involve other stakeholders or ensure that Insurance covers negative outcomes (Never use Insurance as your only control).

In most instances risks will not be reduced by one single action that has an immediate effect. The risk may require a plan to treat the activity over time and in line with available resources/budget. This approach does not apply to extreme risks or high risks that pose an immediate threat to employees, contractors, public or assets.

Once a treatment plan has been determined it must be entered on the Risk Register. A timeline is agreed and a Management Action Plan or Corrective Action Request is entered onto the Risk register.

The risk register is reported to the School Council who monitor that material risks are being managed and mitigated effectively.

## **Monitor and Review**

Risk management is an integral part of organisational processes and not isolated from the management systems. The assessment process is used to maximise opportunities in conjunction with managing threats.

The College recognises that risk management activities are not concluded when risk controls are introduced. The operating environment is always subject to change and risk controls are regularly monitored and reviewed annually to make sure they continue to be effective. Any changes required may then be implemented as part of the annual review of risk management.

The process of monitoring involves ensuring completing the action plan and measuring its achievement, particularly in relation to risks assessed as high and very high. Activities include:

- undertaking regular audits/inspections; and,
- recommending changes where necessary.



This framework is part of the continual improvement process undertaken by the College. Further improvements are based on internal reviews and changes in the legislative and regulatory environment in which the College operates and cultural changes.

## RISK APPETITE

Risk appetite is defined as the amount and type of risk that an organisation is prepared to pursue, retain or accept in the pursuit of strategic objectives, and the internal and external capabilities available to manage such risks.

Defining risk appetite is difficult due to the number and types of business activities and their diversity. It is important to clearly articulate the context of the risk being assessed and detail what controls will be implemented.

The following provides an overview of this important part of the framework.

In the College's operation, it is recognised that some risks are inherent and whilst controls may be applied there is a residual risk that will need to be tolerated/accepted.

The risk appetite is linked to the outcome of the risk assessment process which will assist in applying a consistent approach across the College. If the risk assessment outcome is:

- low - risk is tolerated and dealt with through normal processes;
- medium - risks are tolerated but are monitored by the **Senior Management Team**;
- high - risk is to be monitored by the **School Council**; and,
- extreme - there is zero tolerance to these risks.

There is no risk appetite in the following circumstances:

- non-compliance with legal, professional and regulatory requirements **including child safety**;
- compromising staff/contractor/public safety and welfare; and,
- decisions that have a significant negative impact on long term financial sustainability.

There is considerable appetite for the following activities:

- improvements to higher education services;
- improved efficiency of operations;
- when the cost of mitigating risk is higher than potential loss (unintended consequences must be investigated, and senior management approval sought); and,
- when short term resistance may be experienced but long-term gains are proven.



## APPENDIX 2 RISK REGISTER

The Risk Register records all the risk factors that have been identified in the operating environment, along with the associated risks. It records how the College controls these risks and who has oversight of and responsibility for risk management activity. Nominated Managers are required to develop risk treatment plans which are subject to review by the Management team. The Risk Register is reviewed at least annually by the School Council.

### Impact Rating: Consequence

Risk Categories / (Context)	Consequence Categories				
	Insignificant	Minor	Moderate	Major	Extreme
Reputation (Strategic)	Negligible adverse publicity in social media.	Some adverse publicity in social media and local press.	Adverse publicity in social media and local press, which require key stakeholder management.	Extended adverse publicity in social media and local press, with requires a wider scope of key stakeholder management.	Extended adverse publicity in social media, local, national and international press, which requires a major communication plan for all stakeholders (including VRQA, VCAA etc)
Compliance (Strategic)	Omission or inaccuracy in a reporting activity that is readily corrected.	Minor non-compliance to relevant legislation. Breaches by an individual staff member.	Non-compliance with legislation which is self-reported to VRQA.	Non-compliance with legislation affecting potential loss of VRQA school registration and VCAA course accreditation.	Non-compliance with legislation affecting potential loss of VRQA school registration and VCAA course accreditation.
Operations (Operational)	No interruption to service. Inconvenience to localised operations.	Some disruption manageable by altered operational routine. Reduction in operational routine.	Disruption to a number of operational areas/campus. Closure of an operational area/campus for up to one day.	Several key operational areas closed. Disruption to teaching / course schedules or key business activities for up to one week.	Disruption to services causing the campus to completely close or no ability to operate for more than one week.
Academic (Operational)	Insignificant academic event or incident due to error	Minor academic / misconduct event or incident	Moderate academic fraud / misconduct event or incident.	Major academic fraud / misconduct event or incident	Significant academic fraud / misconduct event or incident
Financial (Strategic)	Less than \$15,000	\$15,000 to \$40,000.	\$40,000 to \$75,000	\$75,000 to \$100,000	Greater than \$100,000
WHS (Operational)	Incident with no injury.	Incident with minor injury requiring first aid.	Incident with compensable injury with medical treatment required.	Casualty or serious injury requiring hospitalisation.	Several casualties due to major incident.

### Impact Rating – Likelihood

Description	Likelihood of Occurrence
Rare	Highly unlikely, but it may occur in exceptional circumstances.
Unlikely	Not expected, but there is a slight possibility it may occur at some time.
Possible	The event might occur at some time as there is a history of casual occurrence.
Likely	There is a strong possibility the event will occur as there is a history of frequent occurrence.
Almost Certain	Very likely. The event is expected to occur in most circumstances as there is a history of regular occurrence.

### Child Safe Risk Register

Risk Factor & Description	Risk Category - Consequence	Owner	Inherent risk assessment			Mitigating action	Residual risk assessment		
			Consequence	Likelihood	Risk Rating		Consequence	Likelihood	Risk Rating
<b>1.Staffing (including volunteers, contractors etc)</b> Failure to recruit, and monitor staff suitability for child connected work	Compliance Reputation	Senior Management Team	Moderate	Unlikely	Moderate	Implement, review and monitor the effectiveness of staff screening, recruitment, induction and monitoring process. Pre-employment reference checks that include checking for child safety, identification and confirming currency.	Moderate	Rare	Low
<b>2.Inappropriate interaction between adults and underage students</b> Risk of inappropriate conduct between an adult and an underage student	Reputation Operations WHS	Senior Management Team	Major	Possible	High	Effective staff and student induction and guidance on acceptable conduct to ensure staff and students (over the age of 18) are made aware of policies, procedures, systems and processes in place in maintaining a Child Safe environment. All visitors are required to sign in providing personal details (name, phone number and company name) and supervised by a staff when on campus.	Major	Unlikely	Moderate
<b>3.Learning Environment –Physical</b> Occurrence of child abuse incidence on campus	Reputation Operations WHS	Senior Management Team	Major	Unlikely	Moderate	All classrooms are fitted with clear windows in walls to enable visibility of occupants and Student Common areas are visible to staff. Library is staffed during opening hours. There is assessment of new or changed physical environments for child safety risks.	Major	Rare	Moderate
<b>4.Learning Environment – Online</b> Occurrence of child abuse incidence on online	Reputation Operations WHS	Senior Management Team	Moderate	Unlikely	Moderate	Effective staff and student induction and guidance on acceptable conduct. Students and staff are required to abide by the ICT acceptable use policy. The ICT environment is maintained, monitored, reviewed and updated accordingly.	Moderate	Rare	Low
<b>5.Learning Environment –activities conducted at external venue</b> Placing underage students at inappropriate facilities & failure to supervise underage students adequately	Reputation Operations WHS	Senior Management Team	Moderate	Unlikely	Moderate	All staff are required to seek permission before an activity involving underage student is organised offsite. All use of external facilities will be assessed and reviewed before approval is granted with appropriate supervision in place. This includes screening, induction and training of any third party education staff.	Moderate	Rare	Low
<b>6.Welfare and living arrangement</b> Placing underage students in inappropriate welfare and living arrangements. Not adequately monitoring the suitability of welfare and living arrangements.	WHS Compliance Reputation	Senior Management Team	Major	Unlikely	Moderate	Effective screening, monitoring and training of all accommodation providers. Staff emphasise importance of establishing a child safe environment at every scheduled homestay check. Expectations and procedure for reporting any child safety risks or child abuse are discussed with homestay hosts.	Major	Rare	Moderate
<b>7. Communication, Engagement and training</b>	Compliance Reputation	School Council	Moderate	Unlikely	Moderate	Staff and student induction, training and guidance to ensure staff are made aware of policies,	Moderate	Rare	Low

Risk Factor & Description	Risk Category - Consequence	Owner	Inherent risk assessment			Mitigating action	Residual risk assessment		
			Consequence	Likelihood	Risk Rating		Consequence	Likelihood	Risk Rating
Not creating a culturally safe environment and adequately empowering students, staff or the community to speak up about child abuse.						procedures, systems and processes in place for reporting child abuse. Engagement of staff, students and their families in the development of school policies through surveys.			
<b>8. Inadequate response to a child abuse incident</b> Not adequately responding to a child abuse incident including supporting students or meeting reporting obligations	WHS Compliance Reputation	Senior Management Team	Extreme	Unlikely	High	EMT and staff induction, training and guidance to ensure staff are made aware of policies, procedures, systems and processes in place for reporting child abuse.	Extreme	Rare	Moderate

## Inherent Risk Rating matrix

Consequence	Likelihood				
	Almost Certain	Likely	Possible	Unlikely	Rare
Extreme				8	
Major			2	3, 6	
Moderate				1, 4, 5	
Minor					
Insignificant					

## Residual Risk Rating matrix

Consequence	Likelihood				
	Almost Certain	Likely	Possible	Unlikely	Rare
Extreme					8
Major				2	3, 6
Moderate					1, 4, 5
Minor					
Insignificant					

## Key to matrices

	Extreme
	High
	Moderate
	Low