

## CHILD SAFETY PROCEDURES

<b>Approving authority</b>	Executive Management Team (EMT)
<b>Purpose</b>	To confirm the Institute's statement of commitment to Child Safety and outlines relevant obligations and guidelines.
<b>Responsible Officer</b>	Executive Director
<b>Next scheduled review</b>	December 2023
<b>Document Location</b>	<a href="http://www.ozford.edu.au/higher-education/policies-and-procedures/">http://www.ozford.edu.au/higher-education/policies-and-procedures/</a>
<b>Associated documents</b>	<ul style="list-style-type: none"> <li>• Child Safe Framework</li> <li>• Child Safety Procedures</li> <li>• Younger Students Policy and Procedures</li> <li>• Student Support &amp; Services Policy &amp; Procedures</li> <li>• Complaints &amp; Appeals Policy and Procedure</li> <li>• Critical Incident Policy and Procedures</li> <li>• Staff Recruitment and Selection Policy and Procedures</li> <li>• Staff Induction Policy and Procedures</li> <li>• Human Resources Policy</li> </ul>

### 1. PRINCIPLES

Ozford Institute of Higher Education (OIHE) is a child safe organisation.

In fulfilling its obligation and commitment as a child safe organisation, this procedure outlines the Institute's Child Safe implementation guidelines and strategies in facilitating a child safe environment including the strategies to prevent or minimise risks to child abuse.

### 2. SCOPE

This policy and procedure applies to all Institute staff. Staff is defined very broadly under the Victorian Child Safe Standards and includes the governing and leadership team members, staff, voluntary position holders, students, and volunteers at all times whilst engaged in the Institute's business or otherwise representing the Institute that may interact with underage students in any manner in online or physical environments. This encompasses visitors, affiliates, contractors and consultants, appointed or engaged by the Institute, to perform functions and/or recognised for their contribution to the Institute and other persons that underage students may interact with on activities organised by the Institute.

### 3. DEFINITIONS

#### *Child*

A child as defined by the Child Wellbeing and Safety Act 2016 is a person who is under the age of 18 years.

#### *Child abuse*

Child abuse includes:

- Any act committed against a child involving a sexual offence or an offence or an offence under section 49M(1) of the Crimes Act 1958; and
- The infliction, on a child, of
  - o physical violent or
  - o serious emotional or psychological harm; and
- The serious neglect of a child

#### *Child connected work*

Work authorised by OIHE and performed by an adult in the OIHE environment where children are likely to be present or engaged.

### *Child safety*

Child safety encompasses matters related to protecting all children from all forms of child abuse, managing the risk of child abuse, providing support to a child at risk of child abuse, and responding to incidents or allegations of child abuse.

### *ESOS National Code*

The ESOS National Code refers to the National Code of Practice for Providers of Education and Training to Overseas Students 2018 established under the Education Services for Overseas Students Act 2000.

### *HES Framework*

Higher Education Standards Framework (Threshold Standards) 2015.

### *Learning Environment*

Learning environments means any physical or virtual place made available by the Institute for use by a child for teaching and learning, including:

- the campus;
- Online learning environments (including email and intranet systems); and
- Other locations provided by the Institute for the purpose of teaching and learning

### *Reportable Conduct*

As listed in the Child Wellbeing and Safety Act 2005, “reportable conduct” include:

- sexual offences (against, with or in the presence of, a child)
- sexual misconduct (against, with or in the presence of, a child)
- physical violence (against, with or in the presence of, a child)
- behaviour that causes significant emotional or psychological harm
- significant neglect.

### *Underage student*

A student under the age of 18 years.

## **4. PROCEDURES**

### **Promotion of Child Safety**

- 4.1 Child Safety policy and procedures is published on the OIHE website.
- 4.2 OIHE’s commitment to zero tolerance of child abuse is promoted on the website and in marketing and other materials supplied to students and their families.
- 4.3 An induction and ongoing training in Child Safe policies, Code of Conduct and Procedures is provided to governing board members, staff, volunteers, contractors, parents/ guardians/ care giver/homestay and any other members of the Institute.

### **Human Resource Practices and Child Safety Code of Conduct**

- 4.4 Human resource practices include child safe screening, supervision, training and other human resources practices that reduce the risk of child abuse by new and existing personnel are detailed in the Human Resource, Staff Recruitment, Selection and Induction policies and procedures.
- 4.5 It is a requirement that all governing board members, staff, volunteers, contractors, parents/ guardians/ care giver/homestay, students over the age of 18 years and any other member of Institute interacting with underage students to formally accept in writing and adhere to this policy, the Child Safety Code of Conduct, and the reporting guidelines.

### **Guidelines to Identify Signs of Child Abuse**

- 4.6 Child abuse can take many forms:

- Physical Child Abuse

Physical child abuse can consist of any non-accidental infliction of physical violence on a child by any person. Examples of physical abuse may include beating, shaking or burning, assault with implements and female genital mutilation.

- Child Sexual Abuse

Child sexual abuse: is when a person uses power or authority over a child to involve them in sexual activity can include a wide range of sexual activity including fondling the child's genitals, oral sex, vaginal or anal penetration by a penis, finger or other object, or exposure of the child to pornography. Child sexual abuse may not always include physical sexual contact and can also include non-contact offences, for example: talking to a child in a sexually explicit way sending sexual messages or emails to a child exposing a sexual body part to a child forcing a child to watch a sexual act (including showing pornography to a child) having a child pose or perform in a sexual manner (including child sexual exploitation). Child sexual abuse does not always involve force. In some circumstances a child may be manipulated into believing that they have brought the abuse on themselves, or that the abuse is an expression of love, through a process of grooming.

- Grooming

Grooming is a criminal offence and occurs when an adult engages in predatory conduct to prepare a child for sexual abuse at a later time. Grooming can include communicating and/or attempting to befriend or establish a relationship or other emotional connection with the child or their parent/carer. Sometimes it is hard to see when someone is being groomed until after they have been sexually abused, because some grooming behaviour can look like "normal" caring behaviour.

- Family Violence

The Family Violence Protection Act 2008 (Vic) defines family violence as behaviour by a person towards a family member where the behaviour: is physically or sexually abusive is emotionally or psychologically abusive is economically abusive is threatening or coercive OR in any other way controls or dominates the family member and causes that family member to feel fear for the safety or wellbeing of that family member or another person. A child can be victim to any of these behaviours. Family violence also includes behaviour that causes a child to hear or witness, or otherwise be exposed to the effects of, any of these behaviours.

- Emotional Child Abuse

Emotional child abuse occurs when a child is repeatedly rejected, isolated or frightened by threats. It also includes hostility, derogatory name-calling and put-downs, and persistent coldness from a person, to the extent that the child suffers, or is likely to suffer, emotional or psychological harm to their physical or developmental health.

- Neglect

Neglect includes a failure to provide the child with an adequate standard of nutrition, medical care, clothing, shelter or supervision.

In some circumstances the neglect of a child:

- can place the child's immediate safety and development at serious risk, or
- may not immediately compromise the safety of the child, but is likely to result in longer term cumulative harm.

- Student sexual offending

Student sexual offending refers to sexual behaviour that is led by a student 10 years and over which may amount to a sexual offence.

- 4.7 Staff must be able to recognise the physical or behavioural signs of child abuse. In many circumstances they may be the only indication that a child is subject to abuse. When identifying child abuse, it is critical to remember that:
- the trauma associated with child abuse can significantly impact upon the wellbeing and development of a child
  - all concerns about the safety and wellbeing of a child must be acted upon as soon as practicable.
- 4.8 All suspicions that a child has been, or may be in danger of being abused must be taken seriously. If there is a reasonable belief that a child has been, or may be at risk of being abused, the adult must act, even if the adult has not directly witnessed the child abuse or student sexual offending.

### **Guidelines for Responding to and Reporting Allegations of Suspected Child Abuse**

- 4.9 The designated child protection officer for the Institute is the Head of Student Support and Administration (HOSSA). As an alternative, all Executive team members are available to support staff.
- 4.10 All adults performing child connected work must act as soon as they witness an incident or form a reasonable belief that a child has been or is at risk of being abused.
- 4.11 If a child's health and safety is in immediate danger, phone emergency services on 000, followed by reporting the incident to the Institute. The designated child protection officer will assist staff in any reporting and liaison with police or other agencies.
- 4.12 As soon as immediate health and safety concerns are addressed all incidents, suspicions and disclosures of child abuse must be reported as soon as possible. It is recommended that persons involved make detailed notes in relation to any concern about or allegation of child abuse and harm and report the concerns or allegation to child protection officer or any other Executive Management Team member.
- 4.13 At all times, a report of suspected criminal activities including child abuse must be made to the police or child protection as soon as possible
- 4.14 A new report must be made to the HOSSA in any circumstance where they become aware of any further incidents, or disclosures, or a form a new suspicion. Every report is critical to protecting a child by building evidence and enabling authorities to gain a clearer understanding of the risks
- 4.15 If the source of suspected abuse comes from within the organisation and constitutes a reportable conduct, the adult must:
- contact Victoria Police via the local police station. It is important that the local police station is contacted and, where appropriate, referred on to the local Sexual Offences and Child Abuse Investigation team.
  - also report internally to the HOSSA who is available to assist the staff member with reporting obligations.
- 4.16 If unsure whether to take action, or what action to take, a discussion with the HOSSA or any other EMT member is recommended.
- 4.17 In the event that the actions of concern are alleged to have been taken by a member of the leadership team, an independent report must also be made confidentially to the Commission for Children and Young People of alleged reportable conduct. Contact details are available on the Commission website : <https://ccyp.vic.gov.au/contact-us/>

### **Guidelines for Incident and Allegation Investigation**

- 4.18 The HOSSA, as the child safety officer, will assist staff in making relevant disclosures and establish if there is need to investigate child safety allegations including notifying the Commission of any reportable conduct.
- 4.19 Students who disclose that they are feeling unsafe or being abused must be heard, must be taken seriously and must be treated with sensitivity and compassion. They and their families and carers should be connected with services that can support them to manage a difficult or traumatic experience.

4.20 An organisation's response to reports of suspected abuse should be the same no matter how the organisation feels about the child's disclosure or the person or persons implicated in their disclosure.

4.21 The HOSSA will:

- Initiate internal processes to ensure the safety of the child
- Clarify the nature of the incident
- Offer support to the child, the parents, the person who reports and the accused staff member or volunteer

4.22 The HOSSA in conjunction with the EMT if required, will:

- 4.22.1 Review, decide, in accordance with legal requirements and duty of care, whether the matter constitutes a "reportable conduct" and/or should/must be reported to the police or Child Protection
- 4.22.2 report matters to the external authorities including police, Child Protection and/or the Commission as soon as possible if required
- 4.22.3 commence an internal review process with the permission of the external authorities if required
- 4.22.4 Notify the relevant individuals involved (with the permission external authorities if required) once an outcome is decided
- 4.22.5 Keep a record of the investigation and outcome
- 4.22.6 Update policies and procedures updated where necessary.

4.23 When investigating and reporting, consider and respect the barriers culturally and/or linguistically diverse backgrounds may face in reporting allegations of abuse. For example, people from some cultures may experience anxiety when talking with police, and communicating in English may be a barrier for some. An interpreter or support person will be available in such circumstances.

4.24 Some children with a disability may experience barriers disclosing an incident. For example, children with hearing or cognitive impairments may need support to help them explain the incident, including through sign language interpreters. Advice on communicating with people with a disability can be found on the Department of Health and Human Services website: [www.dhs.vic.gov.au/for-business-and-community/community-involvement/people-with-a-disability-in-the-community/communicate-and-consult-with-people-with-a-disability/communication-with-people-with-disabilities](http://www.dhs.vic.gov.au/for-business-and-community/community-involvement/people-with-a-disability-in-the-community/communicate-and-consult-with-people-with-a-disability/communication-with-people-with-disabilities)

4.25 Where an incident of suspected child abuse occurs on campus, HOSSA will take action to preserve any items that may amount to evidence of the abuse.

4.26 If a current or previous student discloses an incident of abuse, the HOSSA will:

- Try and separate them from the other students discreetly and listen to them carefully. If a child discloses that they have been, are being, or are in danger of being abused, the disclosure must be treated seriously and immediate action
- Let the student use their own words to explain what has occurred and talk at their own pace.
- not ask questions that are investigative and potentially invasive, but instead, gently ask, 'What happened next?' rather than 'Why?'
- not pressure the student into saying more than they want to and not go over the same information repeatedly
- Reassure the student that what they are saying will be taken seriously, and it is not their fault and that they are doing the right thing.
- restate the student's previous statement, and use non-suggestive words of encouragement, designed to keep the child talking in an open-ended way
- Explain to them that this information may need to be shared others, such as with their parent/carer, specific people in your organisation, or the police.

- Do not make promises such as promising not to tell anyone about the incident, except that the intention to keep them safe.
- Do not leave the student in a distressed state. If they seem at ease in your company, stay with them.
- Provide them with an incident report form to complete, or complete it together, if you think the student is able to do this.
- Ask them what action they would like to take and advise them of what the immediate next steps will be.

4.27 If a parent, legal guardian or a member of the community advises that an underage student has been abused in a or raises a concern, the HOSSA will:

- Explain that the Institute has processes to ensure all abuse allegations are taken very seriously.
- Ask about the wellbeing of the student.
- Allow the person to talk through the incident in their own words.
- Advise the person that notes will be taken during the discussion to capture all details.
- Explain to them the information may need to be reported to authorities or others, such as the organisation’s management, the police or child protection.
- Provide them with an incident report form to complete, or complete it together.
- Ask them what action they would like to take and advise them of what the immediate next steps will be.

4.28 The HOSSA must investigate a new report made in any circumstance where they become aware of any further incidents, or disclosures, or a form a new suspicion. Every report is critical to protecting a child by building evidence and enabling authorities to gain a clearer understanding of the risks. This means that a report must be made to protect a child even if:

- DHHS Child Protection or Victoria Police were previously involved or are already involved with the child and/or their family
- staff are aware that another party, such as a family member, has already raised concerns with the relevant authorities.

4.29 Where there is any suspicion of child safe risks in respect to a student living in a homestay/care giver arrangement, the student will be immediately moved to another arrangement where the student will be safe. Also, the homestay/care giver will no longer be used by the Institute.

### **Guidelines for Reporting to Authorities**

4.30 As soon as immediate health and safety concerns are addressed all incidents, suspicions and disclosures of child abuse must be reported.

4.31 If the source of suspected abuse comes from within the organisation, the HOSSA must:

- contact Victoria Police via the local police station. It is important that the local police station is contacted and, where appropriate they will refer the HOSSA on to the local Sexual Offences and Child Abuse Investigation team.
- Inform EMT to commence an internal review process
- assist the staff member with reporting obligations under “Reportable Conduct Scheme”.

4.32 If the source of suspected abuse comes from within the family or community, the HOSSA must:

- a. Report to DHHS Child Protection if a child is considered to be:
  - in need of protection due to child abuse

- at risk of being, harmed (or has been harmed), and the harm has had, or is likely to have, a serious impact on the child's safety, stability or development.
- b. Report suspected sexual abuse (including grooming) to Victoria Police
- c. Report internally to the EMT (all instances), highlighting:
  - the details of the suspected child abuse or risk of abuse including the name of those involved
  - any immediate actions taken to protect the safety of the child
  - the report or intention to report to DHHS Child Protection, Victoria Police and/or Child FIRST
  - possible steps that can be taken

### **Guidelines for Reportable Conduct Scheme**

- 4.33 The Reportable Conduct Scheme, or RCS, is administered by an independent body, the Commission for Children and Young People (the Commission), to oversee allegation of child abuse and misconduct.
- 4.34 The Institute has a responsibility to report any allegations of 'reportable conduct' raised against adults in child connected work to the Commission for Children and Young People (CCYP) and the alleged victim was under 18 years of age when the alleged conduct occurred.
- 4.35 The Reportable Conduct Scheme requires all allegations of suspected criminal conduct to be reported to Victoria Police as the first priority. The scheme maintains the primacy of an investigation by Victoria Police of any allegations of criminal misconduct.
- 4.36 The Scheme does not replace or interfere with police investigations, it works with Victoria Police to make sure allegations of criminal conduct are dealt with appropriately
- 4.37 The CEO/President has the reporting obligation. However, the HOSSA as their delegate is required to notify the Commission if any person has formed a 'reasonable belief' a staff member, carer, or volunteer has committed reportable conduct.
- 4.38 Reasonable belief is more than suspicion. There must be some objective basis for the belief. However, it is not the same as having proof and does not require certainty. For example, a person is likely to have a reasonable belief if they observed the conduct themselves, heard directly from a child that the conduct occurred, or received information from another credible source (including another witness).<sup>1</sup>
- 4.39 Within three business days of becoming aware of a reportable allegation, HOSSA must notify the Commission that a reportable allegation has been made against one of their workers or volunteers using the online form *Notify and update reportable allegations provided by the Commission*.
- 4.40 The HOSSA will liaise with police to determine whether an investigation will be conducted. An investigation by Victoria Police into criminal or potentially criminal conduct takes priority. If Victoria Police are investigating the allegation, OIHE must not commence an investigation until they have received permission from Victoria Police. Further information on Victoria Police investigations can be found in the Victoria Police Guidelines – Criminal Abuse of Children and Vulnerable People in Organisations: Reporting to Victoria Police (available via [www.police.vic.gov.au](http://www.police.vic.gov.au)).
- 4.41 When an investigation into the reportable allegation is permitted, the investigation may be conducted by an external independent investigator. The EMT will select and appoint an investigator who holds relevant licences to conduct investigations, such as those required under the Private Security Act 2004 (Vic). Selection will be based on their skills and experience in:
- investigating allegations concerning the abuse of children
  - interviewing children, in particular children who may have been traumatised
  - engaging with children with a disability
  - engaging in a culturally sensitive manner.

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<sup>1</sup> See *Allegations of abuse of children in out-of-home care* available on the [Victorian Carer Register website](https://providers.dhhs.vic.gov.au/carer-register) <<https://providers.dhhs.vic.gov.au/carer-register>> and *Information Sheet 2: What is reportable conduct under the Reportable Conduct Scheme* available on the [Commission for Children and Young People's Reportable Conduct Information Sheet website](https://ccyp.vic.gov.au/child-safety/resources/reportable-conduct-scheme-information-sheets) <<https://ccyp.vic.gov.au/child-safety/resources/reportable-conduct-scheme-information-sheets>>.

- 4.42 A reference check will be conducted to confirm that the investigator is an individual with a good knowledge of conducting interviews with children and in a position to answer questions about the outcomes of previous investigations that the investigator before appointment
- 4.43 The HOSSA will inform the Commission of who will conduct the investigation.
- 4.44 The investigation involves gathering and examining information to establish facts and make findings in relation to allegations of child abuse against an employee. The investigation may also make recommendations about what disciplinary or other action should be taken (if any). The investigation will have a systematic approach to assessing and managing an allegation, followed by a sound decision-making framework that enables procedural fairness for all parties in the investigation process.
- 4.45 The key steps in the investigation will include:
- Understanding the issues
  - Planning the investigation
  - Coordinating the investigation
- 4.46 The ‘balance of probabilities’ as the standard of proof steps must be applied. This means that an investigation will consider whether it is more likely than not that reportable conduct has occurred. This may involve comparing conflicting versions of events given by different witnesses in order to decide which version is the more probable. However, investigations do not need to undertake a mathematical or mechanical assessment of probabilities. Rather, the person conducting an investigation and making findings should actually be persuaded, based on the available information that reportable conduct has occurred before making such a finding.
- 4.47 During a reportable conduct investigation, the subject of an allegation may choose, but is not required, to give information or documents that support their version of events. However, the subject of an investigation is not obliged to prove or disprove any fact or issue that is being investigated.
- 4.48 The procedures will be fair and reasonable. This will include ensuring that, before any findings are made or disciplinary action is taken, the subject of an allegation:
- is notified of any adverse information that is credible, relevant and significant
  - has a reasonable opportunity to respond to that information.
- 4.49 Procedural fairness does not require that employees or others must be notified of allegations when the Commission is first notified or that are plainly false. Consideration will also be given to when the subject of the allegation should be first told about an allegation, in order to ensure the investigation is not compromised but remains procedurally fair. The investigator may seek any response or submissions made by the employee in response to allegations or actions, preferably in writing.
- 4.50 Throughout the investigation, other allegations or concerns may be identified. If this occurs, this additional information will be considered in the context of the investigation and may add or change the allegations put to the employee.
- 4.51 The investigation report will document the terms of reference of the investigation, together with how the investigation was undertaken, what evidence and information was obtained, what conclusions were made and, if applicable, any recommendations for consideration. A copy of the final investigation report will be provided to Commission as soon as practicable.
- 4.52 After the investigation has concluded, the EMT will provide CCYP certain information including a copy of the findings and proposed response of the investigation within 30 calendar days.  
Information provided to include:
- Details of the allegation
  - Details of your response to the allegation

- Details about any disciplinary or other action proposed
- Any written response from the worker or volunteer about the allegation and the proposed disciplinary or other action
- Any other requested information.

### **Guidelines for Ongoing Support**

- 4.53 All underage students (including those who are alleged to have perpetrated abuse) will be independently supported in any interviews conducted by Victoria Police or DHHS Child Protection on campus. Where possible and appropriate the student's parent/carer should be present for these interviews. However if this is not appropriate or practicable another staff member from the Institute may be identified as the independent person or support person for the purpose of the interview.
- 4.54 In many cases where it is suspected that a student has been, or is at risk of being abused, it is extremely important that parents/ guardian/ carers of the child are notified as soon as practicable. However there are some circumstances where contacting them may place a child at greater risk.
- 4.55 Before contacting the child's parent, the HOSSA must contact Victoria Police or Department of Health and Human Services (DHHS) Child Protection (depending on who the report has been made to). The Police or DHHS Child Protection will advise about whether it is appropriate to contact parents at this stage.
- 4.56 Generally parents are not to be contacted in circumstances where:
- the parents are alleged to have engaged in the abuse
  - a disclosure to the parent may subject the child to further abuse
  - the child is a mature minor (assessed to be sufficiently mature and intelligent to make such decisions on his or her own behalf) and have requested that their parent/carer not be notified (in these circumstances ideally the child will nominate another responsible adult who can be contacted)
  - the notification is likely to adversely affect the investigation of the incident by the relevant authorities.
- 4.57 Where advised to be appropriate, OIHE will make sensitive and professional contact with parents as soon as possible on the day of the incident, disclosure or suspicion. This enables parents to take steps to:
- prevent or limit their child's exposure to further abuse
  - ensure that their child receives the support that they require.
- 4.58 During this conversation it is important to:
- remain calm, be empathic to feelings and validate concerns
  - provide appropriate details of the incident, disclosure and/or suspicion of child abuse
  - outline the action taken to date and inform them of who the incident, disclosure and/or suspicion has been reported to
  - provide the name and contact phone number of DHHS Child Protection and/or the police officer who is investigating
  - provide information on whether they are likely to be contacted by DHHS Child Protection or Victoria Police (if known)
  - inform them that the investigation may take some time and ask what further information they would like and how the Institute can assist them
  - assure them that support is provided to the child
  - invite the parents/carers to attend a student support group meeting where a student support plan can be prepared to ensure that appropriate support can be provided for their child
- 4.59 Experiences of child abuse can cause trauma and significantly impact on the mental health and wellbeing of children. The HOSSA will ensure that the student is protected and supported throughout any incident involving a child abuse allegation. The HOSSA will:

- establish regular communication between staff and the student's parent/ guardian/carer (if this is appropriate) to discuss a child's progress wellbeing and the effectiveness of planned strategies
- convene a student support group to plan ongoing monitoring, support, and follow-up of the child's health and wellbeing (student support groups usually comprise wellbeing staff, professional counsellors, allied health professionals and where appropriate the student and/or their parent/carer)
- develop and implement a student support plan, which documents the planned support strategies and includes timeframes for review (where possible, these support strategies should be informed by allied health and wellbeing professional with expertise in addressing child abuse and trauma).
- Liaise with any allied health and wellbeing professionals engaged by the student and families
- Provide referral to the wide range of external professional support services, which specialise in providing tailored support and advice for children impacted by abuse including Centres Against Sexual Assault who provide expert support for victims of sexual assault.

4.60 Support will also be provided to staff involved in any incidents, disclosures or suspicions of child abuse.

### **Records of Allegations or Disclosures of Suspected Child Abuse**

4.61 Whenever any disclosure or allegation of suspected child abuse has been made, the details will need to be appropriately recorded. In the first instance, these could take the form of notes on any form of paper available at the time to the respondent.

4.62 As soon as practicable, these should be transferred to the Reporting Record Form, including the details of the disclosure or allegation, the response and actions taken.

4.63 All records relating to a disclosure or allegation must be retained by the Institute in compliance with its records management procedures.

### **Child Safety Risk Management**

4.64 The Executive management team ensures that the Institute develops and implements risk management strategies as detailed in the Risk Management Framework.

4.65 The risk management process includes Child Safe risk identification, assessment, implementation of controls and a monitoring and review process to ensure the currency of the Child Safe risk management approach

4.66 The EMT will identify and analyse child safe risk. Identifying risk involves an assessment of all Institute environments. The process includes review of any previous incident reports.

4.67 The identified risks factors will be analysed and evaluated in terms of the possible consequences and the likelihood of the risk occurring, taking account of the increased level of risk associated with the specific nature of some activities and the vulnerability of particular groups

4.68 The EMT will discuss control and mitigation actions required for each risk factor and allocate appropriate staff with risk oversight and management responsibility.

4.69 The outcomes from the risk management activities will be recorded in the Risk register. The Risk Register records all the risk factors that have been identified along with the associated risks. It records how the Institute controls these risks and who has oversight of and responsibility for risk management activity.

4.70 The risk register is reported to the Executive Management team, the Audit and Risk Committee, the Academic Board and the Governing Board.

4.71 As effective child safe risk management strategies are dynamic and change over time as new risks arise and others may no longer be relevant, the EMT will monitor and review the risk register annually to ensure that it includes all situational child abuse risks and monitoring the effectiveness of the controls as outlined in the policy.

### Participation and Empowerment of Children

4.72 Various strategies are in place to promote the participation and empowerment of children. They include induction session, regular collection of students' feedback, active student participation in student council, the theme of Ethics and Social Responsibility is also comprehensively covered in a first year compulsory core unit.

### 5. QUALITY ASSURANCE

To ensure that policy is fit for purpose and meet the requirements of the HES Threshold Standards the policy will be;

- 5.1 internally endorsed by the Executive Management Team on development or review, prior to approval by Governing Board, or the Academic Board or other delegated authority;
- 5.2 externally reviewed as part of any independent review of the HES Threshold Standards approved by the Governing Board;
- 5.3 internally reviewed by the Responsible Officer every three years from the date of approval (if not earlier);
- 5.4 referenced to the applicable HES threshold Standard and/or other legislation/regulation.

### 6. FEEDBACK

Feedback or comments on this policy is welcomed by the listed Responsible officers of the Institute.

### 7. ACKNOWLEDGEMENT

This policy has initially been developed based on good practice in other higher education providers.

### 8. VERSION CONTROL

Version	Date approved	Description	Approved by
1.0	December 2020	Initial issue	EMT
Related legislation/ regulation/standard	The Child Safe Standards Child Wellbeing and Safety Act 2005 Children, Youth and Families Act 2005 Occupational Health and Safety Act 2004		