

## **Child Safe Risk Management Policy and Procedure**

### **1. Rationale**

This Oxford English Language Centre (Oxford) policy has been developed to meet the Victorian Child Safe Standards.

This policy has been developed to ensure Oxford has appropriate child safe risk management practices. Oxford's child safety risk management strategy is a formal and structured approach to managing risks associated with child safety.

Oxford's process includes risk assessment, implementation of controls and a monitoring and review process to ensure the currency of the risk management approach.

### **2. Scope**

This policy applies to persons that undertake child connected work in Oxford school environments.

It applies to all staff. Staff is defined very broadly under the Victorian Child Safe Standards to include any person engaged in child connected work in any Oxford environment. Child connected work means all work authorised by the Executive Management team and performed by an adult while children are present or reasonably expected to be present. This will include all persons engaged by Oxford or representing Oxford that may interact with younger students in any manner in Oxford's environments.

All Executive Management team and leadership members, staff, volunteers, students over the age of 18 years, contractors including student advocates and homestay hosts are responsible for building and maintaining our child safe culture, taking steps to prevent child abuse and operating in a manner consistent with this policy and procedure.

This policy applies to all Oxford school environments. School environments means any physical or virtual place made available or authorized by Oxford for use by a child during or outside school hours, including:

- A campus of the school;
- Online learning environments (including email and intranet systems); and
- Other locations provided by the school for a child's use including, without limitation, locations used for homestay services, student support services, school camps, sporting events, excursions, competitions, and other events.

### **3. Definitions**

Please refer to the Child Safety Policy and procedure for the definitions applicable to this policy and procedure.

### **4. Policy**

- 4.1 Oxford has zero tolerance to child abuse and is committed to the protection and wellbeing of all children in its school environments. Oxford is committed to provide a

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child safe environment where children and young people are safe and feel safe, and their voices are heard about decisions that affect their lives.

4.2 Ozford 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.

4.3 Ozford 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.

4.4 The risk management processes will enable staff 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.

4.5 Where the Executive Management team, identifies risks of child abuse occurring in the school environment, Ozford 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).

4.6 As part of the risk management strategy and practices, the Executive Management team monitor and review the risks related to child safety and wellbeing annually, including evaluating the effectiveness of the implementation of the identified risk controls.

4.7 The child safe risks identified by Ozford will be recorded on the Child Safe risk register in Appendix 1.

4.8 The Child Safe risk register will be reviewed by the Executive 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.

4.9 This policy is reviewed after any significant child safety incident, or at least every two years, and improved where applicable.

4.10 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 Oxford College policy and procedure
- Consideration of feedback from staff, students and their families collected through surveys.

## **5. PROCEDURE**

5.1 The risk management process has the following components:

- education of the Executive Management team and staff in child safety and the child safe risks in Oxford environments.
- child safe risk reviews to confirm the currency of the risk profile and identify any new or emerging child safe risks.
- Assess the identified child safe risks to establish the risk likelihood and consequence ratings and an overall risk rating.
- development and implementation of controls to manage the risks; and
- monitoring and review process to ensure the currency of the Child Safe risk management approach.

5.2 All Executive Management team 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
- guidance on their information sharing and recordkeeping obligations
- child safety and wellbeing risks in the school environment
- the Oxford child safety policies, procedures and practices

5.3 The Executive 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 CCYP.

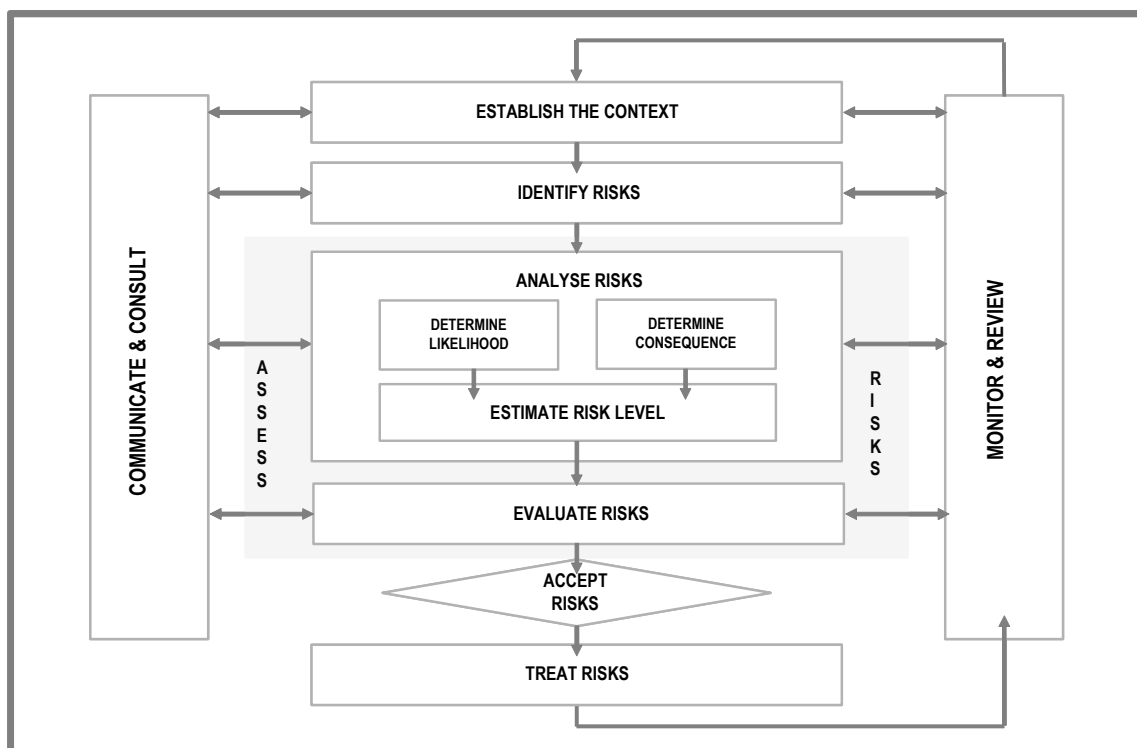
- 5.4 The outcome of the risk assessment will be an updated lists of child safe risks. The identified risks will be analysed and evaluated in terms of the possible consequences and the likelihood of the risk occurring to establish an overall risk rating.
- 5.5 In consultation with staff, the Executive Management team will establish or review the control and mitigation actions for each risk and allocate appropriate staff with risk oversight and management responsibility.
- 5.6 The outcomes from the risk assessment will be recorded in the Child Safe Risk register, how Ozford plans to control these risks and who has oversight of and responsibility for risk management activity.
- 5.7 The Executive 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.
- 5.8 The Executive Management team monitor the effectiveness of the controls annually as part of the risk assessment process and after any significant child safety incident.

## **6. Feedback**

Feedback or comments on this policy and procedure is welcomed by the Executive Management Team.

## 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 Executive Management team; 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 Ozford and has both a strategic and operational context encompassing the secondary school operations.

### Strategic Context

Strategic risk identification involves the relationship between Ozford 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 Oxford'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 Oxford. 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 Executive Management team 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.

Oxford 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 Oxford. Further improvements are based on internal reviews and changes in the legislative and regulatory environment in which Oxford 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.

In Oxford'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 Oxford. If the risk assessment outcome is:

- low - risk is tolerated and dealt with through normal processes;
- medium - risks are tolerated but are monitored by managers;
- high - risk is to be monitored by Executive management team; 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;
- 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 Oxford 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 Executive Management team.

### 7. 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	EMT	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	EMT	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	EMT	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. 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	EMT	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	EMT	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	WHS Compliance	EMT	Major	Unlikely	Moderate	Effective screening, monitoring and training of all accommodation providers.	Major	Rare	Moderate

Risk Factor & Description	Risk Category - Consequence	Owner	Inherent risk assessment			Mitigating action	Residual risk assessment		
inappropriate welfare and living arrangements. Not adequately monitoring the suitability of welfare and living arrangements.	Reputation					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.			
<b>7. Communication, Engagement and training</b> Not creating a culturally safe environment and adequately empowering students, staff or the community to speak up about child abuse.	Compliance Reputation	EMT	Moderate	Unlikely	Moderate	Staff and student induction, training and guidance to ensure staff are made aware of policies, 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.	Moderate	Rare	Low
<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	EMT	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