CHILD SAFETY STANDARD 6: Child safety risk management strategies

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Introduction

Registered schools have an important responsibility for keeping children safe. Schools already take steps to protect children from abuse. More can be done, however, particularly in respect to ensuring that a school's risk management strategies meet all the child safety requirements set out in Ministerial Order No. 870.

Child safety standard six (clause 12 of the Ministerial Order) requires the school governing authority to develop, implement, monitor and evaluate risk management strategies to ensure child safety in school environments.

This information sheet sets out the five specific requirements of child safety standard six, questions that will assist in assessing the existing compliance of a school and identifying areas for further work, an example risk assessment template and a risk rating matrix.

Please note that the Ministerial Order defines some terms broadly. Some examples are included at the end of this information sheet. A full list of definitions is available at www.vrqa.vic.gov.au/childsafe.

What is a child safety risk management strategy?

A child safety risk management strategy is a formal and structured approach to managing risks associated with child safety. The strategy outlines how risk is managed, including who is responsible for the process (the school governing authority), and a description of the process itself. The process includes risk assessment, implementation of controls, and a monitoring and review process to ensure the currency of the risk management approach.

Managing risk typically involves the following steps and considerations.

1. Identify the school's child safety risks.
   - What are the areas of concern or hot spots?
   - What could go wrong?

2. Identify any existing risk mitigation measures or internal controls.
   - What strategies, practices, or procedures are in place to control the risk?
   - Have they been fully implemented?
   - Are staff, contractors, volunteers, parents and students aware of them?
   - How effective are they?

3. Assess and rate the school's child safety risks given the existing controls in place, taking into account the likelihood of risk, and the likely consequence of the risk.
   - What are the consequences?
   - What is the likelihood of those consequences?

4. If the risk rating is more than the *'acceptable level'*, identify further risk management strategies through additional controls or other prevention, detection or mitigation strategies and then re-assess the risk.
   - What is the '*acceptable level'* of risk? For child safety, there should be little or no tolerance of risk.
   - What strategies, practices, or procedures could be put in place to control or manage the risk?

The risk management process should be documented, recorded and reviewed periodically. Effective risk management strategies are dynamic and change over time as new risks arise and others may no longer be relevant

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Child Safety Standard 6

Requirement 1: The school governing authority must develop and implement risk management strategies regarding child safety in school environments.

Risk questions	Yes	No

Does the school have a structured and documented approach to identifying child safety risks?

Does the risk assessment process involve appropriate, knowledgeable people? eg registered teachers, support staff, students, parents.

Has the risk assessment process considered issues related to students of different age groups and the diversity of the student group, including but not limited to children with a disability, Aboriginal and Torres Strait Islander children and children from culturally and linguistically diverse backgrounds?

Has the school established risk rating criteria including appropriate ratings for the likelihood and consequence of risks?

Has a risk assessment already been carried out with respect to child safety risks?

Has the school established existing internal controls to manage child safety risks and has their effectiveness been considered?

Has the school identified new controls/management actions to mitigate child safety risks?

Do the risk management strategies challenge the potential to overestimate the effectiveness of the school's existing controls?

Do the risk management strategies encompass predatory, opportunistic and situational environment risks:

- predatory risks[1] (persons who may become adept at creating opportunities to sexually abuse and avoid detection)
- opportunistic risks[2] (persons who may sexually abuse in low-risk, low-effort situations)
- situational risks[3] (persons who may sexually abuse in a specific set of circumstances)
- environment risks (environments that create child safety risks).

Has the risk management strategy been endorsed by the school's leadership team/principal class officers?

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[1] Predatory – Persistent; calculating; unambiguous sexual interest in children; prepared to invest effort, but only if necessary; may become adept at creating opportunities and avoiding detection.

[2] Opportunistic – General propensity to exploit opportunities for personal gain at the expense of others, but unlikely to invest significant effort in creating opportunities; no special/unusual sexual interest in children; may sexually abuse in low-risk, low-effort situations.

[3] Situational – Conventional social values; usually adequate self-control, and sensitive to informal social controls; may sexually abuse in a specific set of circumstances.

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Risk questions	Yes	No
Has the risk management strategy been endorsed by the school's governing authority?		

Requirement 2: The school's risk management strategies regarding child safety must identify and mitigate the risk(s) of child abuse in school environments by taking into account the nature of each school environment, the activities expected to be conducted in that environment (including the provision of services by contractors or outside organisations), and the characteristics and needs of all children expected to be present in that environment.

Risk Questions	Yes	No
Does the risk management process consider 'hot spots' and 'hot times' of student-staff and student-student interactions with respect to child safety?		
Does the school have a process that ensures child safety risks of any new or changed physical environments on and off campus are reviewed?		
Does the school perform screening as part of its staff recruitment process, including for volunteers and contractors? eg WWCC's[4], criminal background checks, reference checks, psychometric testing etc.*		
Does the school monitor who is on the premises? eg visitor and contractor sign-in process, perimeter control.		

Does the risk management process consider child safety risks that may exist in the school environment before, during and after hours, as appropriate? Have you considered your:

- classrooms and learning environments
- specialist facilities such as libraries, kitchens and computer, music and art rooms
- vocational education and training (VET) facilities on campus or off-site
- recreation areas, playgrounds, sporting facilities on campus and off-site
- staff workplaces and offices
- student change rooms and locker areas
- transport facilities and locations eg buses, bus stops (excluding public transport)
- excursion or camp locations
- any other school specific environments.

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[4] Please refer to the *Working With Children Act 2005* which establishes a process to screen persons engaging or intending to engage in child-related work through a working with children check, and also sets out exemptions from that requirement for volunteers, parents and others.

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Risk Questions	Yes	No

Does the risk management process consider child safety risks in the online environment and through media including:

- email
- Facebook, Instagram, Twitter and other social media
- YouTube
- mobile phone SMS messages and other mobile messaging media
- telephone, Skype and other media for making voice calls
- photography and videography
- any other electronic media.

Does the risk management process consider child safety risks regarding relationships and interactions with students among the following people involved with the school:

- registered teachers and educational support staff
- welfare staff or those in pastoral care roles relationships with students
- other students
- administration and support staff
- contractors such as specialists delivering services to students eg VET units, music, media or recreation lessons or activities
- volunteers
- facilities and security staff interactions with students
- visitors to the school or other persons that may have access to students.

Requirement 3: If the school governing authority identifies risks of child abuse occurring in one or more school environments the authority must make a record of those risks and specify the action(s) the school will take to reduce or remove the risks (risk controls).

Explanatory note: Different risk controls may be necessary for particular groups of children depending on the nature of the risk and the diversity characteristics of children affected by the risk.

Risk Questions	Yes	No

Have the identified risks been documented and recorded?

Have strategies or the mitigation actions (new internal controls) for the risks been established and documented?

Do the risk management strategies take into account the diversity of the children that are affected by the risk?

Do the risk mitigation actions (controls):

- increase the effort required to abuse
- increase the likelihood of detection of inappropriate and/or abusive behaviour
- remove triggers for inappropriate and/or abusive behaviour
- reduce permissibility of inappropriate behaviour.

Does the school ensure that every person (eg whether employee, contractor, volunteer, or visitor to the school) understands the school's expectations for child safety?

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Requirement 4: As part of its risk management strategy and practices, the school governing authority must monitor and evaluate the effectiveness of the implementation of its risk controls.

Risk Questions	Yes	No
Does the school test the effectiveness of internal controls surrounding child safety?		
Is the school monitoring its child safety risk management strategies to confirm they have been implemented?		
Does the school review the child safety risk management strategies to confirm their effectiveness?		
Does the school governing authority monitor the child safety standard risk management strategies?		
Does the school governing authority evaluate the effectiveness of the implemented mitigation controls?		

Requirement 5: At least annually, the school governing authority must ensure that appropriate guidance and training is provided to the individual members of the school governing authority and school staff about:

 a) individual and collective obligations and responsibilities for managing the risk of child abuse;
 b) child abuse risks in the school environment; and
 c) the school's current child safety standards.

Risk Questions	Yes	No
Is guidance and training provided to members of the governing authority and school staff about: • individual and collective obligations and responsibilities for managing the risk of child abuse • child abuse risks in the school environment • the school's current child safety standards.		
Are the outcomes of the risk assessment made available to all relevant people eg staff, students, parents, in line with best practice approaches to increase transparency of the school's compliance with the child safe standards?		

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Risk Assessment

A key part of a risk management strategy is a risk assessment. Risk assessments can take many forms. An example of a common style of risk assessment is provided below. Also provided is an example of a risk rating matrix and some examples of risks and controls.

Example Risk Assessment Template

Below is an example of a child safety risk assessment approach that could be used to identify risks and document child safety risk management strategies.

Risk Event	Existing Management strategies or internal controls	Likelihood	Consequence	Current risk assessment	New risk management controls or internal controls	Who is responsible?	Residual risk
No organisational culture of child safety- child abuse tolerated, hidden from public.	Child safety code of conduct, embedding culture of child safety	Possible	Severe	Extreme	Staff induction and annual awareness training, inclusion of obligation in staff position descriptions, policy and procedure for managing child safety, performance management procedures, reporting procedures	Principal and Chair of School Governing authority	Low
Recruitment of an inappropriate person – inappropriate behaviour	WWCC or Victorian Institute of Teaching registration	Unlikely	Major	Medium	Criminal history search, online searches (Google, Facebook etc), pre-employment reference check includes asking about child safety	Principal	Low

Example Risk Rating Matrix

RISK RATING		Consequence				
		Insignificant	Minor	Moderate	Major	Severe
Likelihood	Almost Certain	Medium	High	Extreme	Extreme	Extreme
	Likely	Medium	Medium	High	Extreme	Extreme
	Possible	Low	Medium	Medium	High	Extreme
	Unlikely	Low	Low	Medium	Medium	High
	Rare	Low	Low	Low	Medium	Medium

Examples of Potential Child Safety Risks and Risk Management Strategies

The table below comprises a listing of potential child safety risk and risk management strategies. These lists are not intended to be exhaustive.

Risks

- Lack of an organisational culture of child safety
- Familiarity breeding a culture of not reporting issues
- Natural trust of long term employees (who may have developed issues over time)
- Children alone with one other person unsupervised
- Recruitment of an inappropriate person
- Inappropriate behaviour not reported
- Harassment via email, SMS or other media
- Unsupervised recreational or other activities
- Ad-hoc contractors on the premises (eg maintenance)
- Vulnerability of staff and students due to unknown personal issues
- Unknown people and environments at excursions and camps
- False allegations

Risk Management Strategies

- Implement an effective child safety risk management strategy
- Child safety code of conduct
- Child safety reporting procedures
- Induction for all visitors, staff, volunteers and contractors
- Train students and staff to detect inappropriate behaviour
- Counselling and other resources
- CCTV for unsupervised areas, and 'hot spot' areas
- Clear windows in walls to enable visibility of occupants
- Non-lockable doors in hot spots
- Assessment of new or changed physical environments for child safety risks
- Supervision or monitoring of activities
- Online searches (Google, Facebook etc)
- Performance management procedures
- Pre-employment reference checks that include checking for child safety
- Criminal history checks and confirming currency of WWCC/VIT registration
- Psychometric testing

The VRQA has also developed information resources to support schools in developing their staff recruitment and selection processes. These are available from www.vrqa.vic.gov.au/childsafe.

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Further information

Victorian Registration and Qualifications Authority

Child safe standards website (all schools): www.vrqa.vic.gov.au/childsafe

Government Schools

Website: www.education.vic.gov.au/childhood/providers/regulation/Pages/childsafestandards

Email: child.safe.schools@edumail.vic.gov.au

Catholic Schools

CECV Industrial Relations (03) 9267 0228

Catholic Education Melbourne, Student Wellbeing Information Line (03) 9267 0228

Catholic Education Office Ballarat, Child Safety (03) 5337 7135

Catholic Education Office Sale, Child Protection Officer (03) 5622 6600

Catholic Education Office Sandhurst, Child Safe Officer (03) 5443 2377

Website: www.cecv.catholic.edu.au

Seventh-day Adventist Schools

Adventist Schools Victoria Office (03) 9264 7730

Website: www.asv.adventist.edu.au

Lutheran Schools

Contact the regional office via phone (03) 9236 1250 or email operations@levnt.edu.au.

Independent Schools who are members of Independent Schools Victoria

Telephone: (03) 9825 7200

Email: enquiries@is.vic.edu.au

Website: www.is.vic.edu.au

The Victorian Institute of Teaching

For *Victorian Teaching Profession Codes of Conduct and Ethics* and information about employer responsibilities to report action taken against registered teachers in response to allegations and concerns about registered teachers.
Website: www.vit.edu.au

Acknowledgements

The VRQA would like to acknowledge the following organisations and individuals whose resources were consulted in the preparation of this information sheet.

- NSW Ombudsman 2012, *Risk management following an allegation against an employee*

- Government of South Australia, Office for Recreation and Sport 2016, *Risk Management Resource for Recreation and Sport Organisations*

- Government of South Australia, Office for Recreation and Sport 2016, *Key Risks: Knowing What They Are and How They Can Be Managed* and *Risk Management Process: Risk Management Resource for Recreation and Sport Organisations*

- State Government of Victoria, Commission for Children and Young People, *What to Look For in a Childsafe Organisation*

- NSW Government, Office of the Children's Guardian, *Risk Management: Child Safe Organisations*

- Government of Western Australia, Department for Child Protection 2011 *The Signs of Safety: Child Protection Practice Framework*

- Child Wise, *12 Steps to Building Child Safe Organisations*

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- Queensland Government, Department of Communities, Child Safety and Disability Services, *Practice Guide: Assessing Harm and Risk of Harm*

- Moores and ourcommunity.com.au, Institute of Community Directors Australia 2016, *Child Protection Toolkit: What Every Not-for-Profit Organisation Must Do Now*

- Australian Children's Commissioners and Guardians, Ombudsman of New South Wales, *Principles for Child Safety in Organisations*

- Ronken, C., Bravehearts, *Shared Responsibilities: How Can We Better Support Victims of Child Sexual Harm*

- Government of Western Australia, Department for Child Protection and Family Support, Community and Disability Ministers' Conference *Schedule: An Evidence-Based Guide for Risk Assessment and Decision Making When Undertaking Background Checking, Creating Safe Environments for Children. Organisations, Employees and Volunteers National Framework*

- Government of South Australia Department of Education and Child Development, Families SA 2012, *Child Safe Environment: Principles of Good Practice*

- State Government of Victoria, Department of Health and Human Services 2015 *An Overview of the Victorian Child Safe Standards*

- State Government of Victoria, Department of Health and Human Services, Betrayal of Trust Child Safe Organisations 2015 *Criminal Law Reform and Child Safe Standards*

- State Government of Victoria, Commissioner for Children and Young People, Version 2, 2015 *A Guide for Creating a Child Safe Organisation*

- State Government of Victoria, Department of Health and Human Services, 2015 *Good Leadership and Governance in Child Safe Organisations: Child Safe Standards Toolkit Resource One*

- Queensland Government, Department of Education and Training *Student Protection Policy*

- Government of South Australia, Department for Education and Child Development, Families SA *Creating a Child Safe Environment*

- Australian Government, Australian Institute of Family Studies, Child Family Community Australia, CFCA Resource Sheet 2013, *Risk and Protective Factors for Child Abuse and Neglect*

- Centres for Disease Control and Prevention, *Child Abuse and Neglect: Risk and Protective Factors*

- Child Matters, *Risk Factors of Child Abuse*

- Smallbone, Prof. S., School of Criminology and Criminal Justice, Director, Griffith Youth Forensic Service, Griffith University, 2015, *Child Safe Schools: Can Sexual Abuse Be 'Designed Out'?*

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Definitions

A full list of definitions for Ministerial Order No. 870 is available at www.vrqa.vic.gov.au/childsafe.

Child abuse includes–

- any act committed against a child involving–
  - o   a sexual offence or
  - o   an offence under section 49B(2) of the *Crimes Act 1958* (grooming)
- the infliction, on a child, of–
  - o   physical violence or
  - o   serious emotional or psychological harm
- serious neglect of a child.

Child-connected work means work authorised by the school governing authority and performed by an adult in a school environment while children are present or reasonably expected to be present.

Child safety encompasses matters related to protecting all children from 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.

School environment means any physical or virtual place made available or authorised by the school governing authority for use by a child during or outside school hours, including:

- a campus of the school
- online school environments (including email and intranet systems)
- other locations provided by the school for a child's use (including, without limitation, locations used for school camps, sporting events, excursions, competitions, and other events).

School staff means:

- in a government school, an individual working in a school environment who is:
  - o   employed under Part 2.4 of the *Education and Training Reform Act 2006* (ETR Act) in the government teaching service or
  - o   employed under a contract of service by the council of the school under Part 2.3 of the ETR Act or
  - o   a volunteer or a contracted service provider (whether or not a body corporate or any other person is an intermediary).
- in a non-government school, an individual working in a school environment who is:
  - o   directly engaged or employed by a school governing authority
  - o   a volunteer or a contracted service provider (whether or not a body corporate or any other person is an intermediary)
  - o   a minister of religion[5].

- *school governing authority* means:
  - o   the proprietor of a school, including a person authorised to act for or on behalf of the proprietor; or
  - o   the governing body for a school (however described), as authorised by the proprietor of a school or the ETR Act; or
  - o   the principal, as authorised by the proprietor of a school, the school governing body, or the ETR Act.

  Explanatory note: There is a wide variety of school governance arrangements. Depending on the way a school is constituted and operated, the governing body for a school may be the school board, the school council, or some other person or entity. The school governing authorities may share or assign responsibility for discharging the requirements imposed by this Order, in accordance with the school's internal governance arrangements.

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[5] **minister of religion** has the same meaning as in the *Working with Children Act 2005.*

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