Child Safe Risk Management

The purpose of this document is to assist schools and school boarding premises* to identify, document, manage and control child safety risks in the school or school boarding premises environment.

The Diocese of Ballarat Catholic Education Limited (DOBCEL) is committed to zero tolerance of child abuse, as articulated in our Commitment Statement to Child Safety. All staff and members of our school communities have a duty of care to protect the safety, health and wellbeing of children in their care. Our schools consist of a diverse population, including students with a disability, Aboriginal and Torres Strait Islander children and children from culturally and linguistically diverse backgrounds. DOBCEL's Board, as a governing authority, understands its obligations in relation to *Ministerial Order No. 1359 Implementing the Child Safe Standards- Managing the Risk of Child Abuse in Schools and School Boarding Premises* and is committed in ensuring that our compliance and regulatory obligations are met at all times.

All students are vulnerable to child safety risks. Some students are more vulnerable than others. Systems and processes must be put in place to help prevent harm to students in schools (including school boarding premises).

A thorough risk analysis is the first thing schools should do to promote child safety; it provides the foundation to inform all other child safety work, including policies, procedures and practices. It is not possible to eliminate every risk to child safety. Schools should manage and monitor risks and regularly review their risk assessment.

All child safety risks have severe consequences, some of which have been described in the DOBCEL School Consequence Rating Table within the DOBCEL Risk Management Framework. Schools need to assess child safety risk with a focus on preventing and reducing child abuse and harm.

Ministerial Order 1359 background

Ministerial Order 1359 provides the overarching framework for child safety in schools and requires schools to undertake specific tasks. To comply with Ministerial Order 1359, schools must:
- develop and implement 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. (*Clause 6.2c*)
- if the school governing authority identifies risks of child abuse occurring in the school environment, make 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) (*Clause 6.2d*)
- as part of its risk management strategy and practices, monitor and review the risks related to child safety and wellbeing annually, including evaluating the effectiveness of the implementation of all risk controls (*Clause 6.2e*) - DOBCEL records risks using the SIMON Risk Register which describes the risks and the risk mitigation strategies (controls and treatments) that will be used to manage the risks. The risk mitigation strategies employed at each school take into account the particular groups of children and their characteristics.

*in this document schools refers to schools and school boarding premises

- when engaging a volunteer to perform child-connected work, the school governing authority must consider the child safety risks relevant to the volunteer's role and, if reasonable and appropriate, collect and record
  - proof of personal identity
  - information about any essential or relevant professional or other qualifications
  - the person's history of work involving children
  - references that address the person's suitability for the job and for working with children (*Clause 10.2e(ii)*).
- ensure that school staff engaged in child-connected work receive information and training at least annually about child safety appropriate to their roles, including guidance on identifying and mitigating child safety and wellbeing risks in physical and online environments without compromising a child's right to privacy, access to information, social connections and learning opportunities
- provide training as required to volunteers on how to identify and manage child safety risks relevant to the role the volunteer will undertake, without compromising a child's right to privacy, access to information, social connections and learning opportunities
- ensure that children, families, school staff and volunteers are provided with the opportunity to have regular input into the school's child safety policies, procedures and risk strategies related to child safety and wellbeing.

Dimensions of Risk of Child Sexual Abuse

Informed by research for the Royal Commission into Institutional Responses to Child Sexual Abuse[1], the research report, Assessing the different dimensions and degrees of risk of child sexual abuse in institutions, proposes situational, vulnerability, propensity and institutional risks as the four main dimensions.

- **Situational risk** provides potential perpetrators with the opportunity to be alone with a child or form relationships that involve physical contact or emotional closeness. This can lead to grooming and unlawful sexual behaviour.

  The research suggests that residential institutions (including boarding schools) carry an elevated situational risk.

- **Vulnerability risk** arises from the characteristics of the children present in the institution. The research suggests that the main factors influencing vulnerability risk are:
  o the ages of the children
  o children with disability
  o children with prior experience of maltreatment
  o children with an incentive to remain silent.

- **Propensity risk** arises from a disproportionate clustering of adults with a propensity to abuse children or children with harmful sexual behaviours.

- **Institutional risk** takes into consideration characteristics of the institution that may make abuse more likely to occur and less likely to be identified and responded to effectively.

  The research suggests that these characteristics include institutions placing greater importance on the protection of reputation than on the wellbeing and protection of children. Other characteristics include a culture of not listening to and respecting children.

Further detail, including examples of each dimension for schools to consider is available in the DOBCEL Dimensions of Risk of Child Sexual Abuse Information Sheet for Schools.

Rating Consequences - Considering harm

The DOBCEL Risk Management Framework is based on the international standard ISO 31000:2018 Risk Management. Risk is usually rated after assessing a combination of the likelihood of an event (the probability that it will occur) and the consequences (the impact of that event if it does occur).

Assessing the consequences of child abuse and harm is complex. The same form of abuse can have very different impacts on different children, making it hard to predict how an abuse or harm type will affect an individual child. Some consequences may take years to manifest, and some forms of abuse have a cumulative impact on children (CCYP – A guide for creating a Child Safe Organisation). DOBCEL therefore considers the consequence of child abuse and harm to be severe in all instances.

CATEGORY	Severe (5)
Child Centred Child Safety Consequences	The child's life is damaged (alcohol and/or drug misuse, relationship concerns) The child perpetrates against another child The child experiences ongoing psychological or physical trauma The child self-harms The child loses faith in the institution The child retreats / acts out The child feels unsafe The child does not feel heard Absenteeism Disconnection from peers

Failures in child safety, with or without abuse, also have organisational consequences. The below is taken from the DOBCEL Risk Management Framework, Consequence Rating Table.

CATEGORY	Severe (5)	Major (4)	Moderate (3)	Minor (2)	Negligible (1)
Child Safety	Major non-compliance with Ministerial Order 1359 resulting in suspension of registration from regulatory authority Failure to protect children and young people resulting in criminal convictions, civil action and/or removal of registration of school. Significant legal /reputational / financial impact	Ongoing non-compliance Ministerial Order 1359 resulting in warning from regulatory authority Substantiated findings of Reportable Conduct and/or misconduct against a staff member(s) Legal / reputational / financial impact	Failure to act following a notification of non-compliance with Ministerial Order 1359 Minor or no regulatory or legal sanctions, minor or no financial impact	Notification of non-compliance with Ministerial Order 1359 Allegation of Reportable Conduct or misconduct against an individual staff member	Allegation of noncompliance with Ministerial Order 1359 Internally identified minor non-compliance

Controls and treatments

Schools must consider the following when identifying existing and planning for new controls and treatments:

- **Policies** – what is the school policy towards a risk?
- **Processes** – what are the steps the school takes to deal with a risk? For example, appointing a child safety champion
- **Programs –** what existing programs can be implemented across the school to address a risk? For example, respectful relationships, mental health practitioners in schools, school wide positive behaviour support etc.
- **Physical changes** – can the school change the physical environment to reduce a risk?
- **Online filters / blocked websites** – can the school manage the online environment to reduce a risk?
- **Improved supervision / surveillance** – can the school improve vision of high-risk areas, for example physical or online, to reduce a risk?
- **Behavioural interventions** – how does the school monitor behaviour of students, staff and volunteers to reduce a risk?
- **Rules and guidelines for students** – how does the school support students to behave safely to reduce a risk?
- **Routines for students** – can the school create sense of predictability to reduce a risk?
- **Training** – can the school upskill staff and volunteers to reduce a risk?
- **Communications** – can the school communicate through school channels to reduce a risk?

Reviewing and maintaining the Child Safety Risk Register

The SIMON Risk Register includes each schools Child Safety Risk Register, which has been contextualised by each school to suit their unique context.

Each Risk has an individual number and title and is described under the following headings:

Risk Description	What is the Event? What is the thing that might happen?
Risk Category	Relevant grouping from: **Child Safety**, Financial, Health & Safety, Information Technology, Legal & Regulatory, Operational, People & Capability, Strategic, Student Outcomes Reports can be run to only include the Child Safety category
Risk Owner	
Risk Rating	What is the current risk level based on the DOBCEL Risk Rating Matrix after rating the Likelihood and Consequence
Possible Causes	What would cause it to go wrong?
Possible Impacts	What are the consequences or impacts if it does go wrong?
Current Controls	What is in place now that reduces the likelihood of this risk occurring or its impact if it did occur
Control Effectiveness	Unknown Partially Effective None or Totally Ineffective Substantially Effective Largely Ineffective Fully Effective The effectiveness of the implementation of the current risk controls
Treatments	What will be done? Who is accountable? When will it happen?

Risk Reports

The SIMON Risk Register is able to produce a range of reports, these reports can then be used for reporting to Staff Meetings, the School Advisory Council (SAC), etc.

Resources and references

- DOBCEL Risk Management Framework
- Commission for Children and Young People: Being a Child Safe Organisation
- Protecting Children - Mandatory Reporting and other obligations e-learning module
- Victorian Registration and Qualification Authority: Child Safe Standards
- DOBCEL Dimensions of Risk of Child Sexual Abuse Information Sheet for Schools