

## Child Safeguarding Risk Management Policy and Procedures

### Rationale

Clyde Grammar has a definitive ethos, which is to deliver exceptional, high quality, affordable education, embedded with Christian faith and values.

At Clyde Grammar, our passionate, dedicated staff acknowledge the importance of providing a safe stimulating environment where children are excited to come to school every day and eager to learn in a safe and nurturing environment.

Our key objective is to provide rich, engaging learning experiences in accordance with the Victorian Curriculum, that cater for the person needs and growth of each individual child.

CSV and Clyde Grammar are committed to ensuring the safety, wellbeing, and participation of all children and young people under our care.

Clyde Grammar is committed to ensuring the safety, wellbeing, and participation of all children and young people under our care. Our commitment to keeping children and young people safe cannot be achieved without effectively managing child safeguarding risks.

The School's governing authority has approved the School's Child Safeguarding Risk Management Policy and Procedures, as set out in the Policy Administration section, below.

Standards 2 and 9 of the Victorian Child Safe Standards require the School to develop and implement risk management strategies regarding child safety in the School's environments. Clauses 6 and 13 of Ministerial Order 1359 set out particular requirements that must be met when doing so.

### Objective

Clyde Grammar has developed a suite of policies including our Risk Management Policy and Procedures that provides key elements of our approach to protecting children from abuse. It forms the foundation of the School's procedures, practices, decision-making processes and ultimately the School's culture with respect to child safety.

Clyde Grammar has a broad range of risks associated with its activities and operations, including risks relating to child safeguarding. Effectively managing child safeguarding risks is a vital element in ensuring that our School is keeping children and young people safe.

While child safeguarding risks within the operations of a school can never be completely eliminated, Clyde Grammar actively implements risk management practices to ensure that child safeguarding risks are reduced.

Our Child Safe Risk Management Policy and Procedures outline our approach to managing child safeguarding risks.

### Statement of Commitment to Child Safeguarding

Clyde Grammar is committed to ensuring the safety, wellbeing, and participation of all children and young people under our care. We have zero tolerance for child abuse.

Clyde Grammar has a moral, legal and mission-driven responsibility to create nurturing school environments where children and young people are respected and their voices heard, and where they are safe and feel safe.

This policy and procedures apply to:

- all staff members
- volunteers

- contractors

All staff, volunteers and contractors are together referred to as “Staff” and “staff members” for the purposes of this Policy and its Procedures)

They apply in all School environments, including physical, virtual and online environments, and on-site and off-site School grounds (e.g. extra-curricular activities such as sport and other programs, camps and excursions, interstate and overseas travel).

## Definitions

Definitions of particular terms used in the Child Safe Risk Management Policy and Procedures can be found in **Child Safeguarding Program Definitions**.

Of particular importance to this policy and its procedures are the following additional definitions:

Risk	The term “risk” means, in simple terms, the possibility of something bad happening.
Risk Management	“Risk management” is the general process of identifying and assessing risks, followed by the application of resources to mitigate, monitor, and control the probability and/or the impact of these events.
School Staff	<p>“School staff” is a particular phrase used in Ministerial Order 1359, and is defined as “an individual working in a school environment who is:</p> <ul style="list-style-type: none"> <li>• directly engaged or employed by a school governing body</li> <li>• a contracted service provider (whether or not a body corporate or any other person is an intermediary) engaged by a school governing body to perform child-related work; or</li> <li>• a minister of religion, religious leader or an employee or officer of a religious body associated with the school”.</li> </ul>

The engagement or employment of Staff and Contractors at the School (other than the Principal, Deputy Principal / Head of Campus and Business Manager) is undertaken by the School. This means that, at the School, **all staff members, as well as Direct Contact Contractors** and any minister of religion, religious leader or an employee or officer of a religious body associated with the School, are “school staff”

## Responsibilities

Identifying and managing child safeguarding risks is everyone’s responsibility. **All adults in the School community have a shared responsibility for contributing to the safety and protection of students through identifying and managing these risks.**

In addition to relevant roles and responsibilities as set out in **Child Safeguarding Responsibilities**, the following people have particular responsibilities under this Policy and its Procedures.

### The Principal

The Principal is responsible for the effective day-to-day management of risk and for:

- effectively implementing the School's child safeguarding risk management strategies, and effectively deploying all available resources for that purpose
- communicating openly and honestly with, and providing advice to the School Advisory Council in relation to:
  - child safeguarding risk management at the School
  - any instances of non-compliance with child safeguarding legal and regulatory requirements
  - any breakdown in child safeguarding risk controls, systems or processes
  - identifying child safeguarding risks (including new and emerging risks) relevant to the School and the steps taken (or that should be taken) to mitigate these risks
  - the resources required for the School to meet its legal and regulatory compliance requirements, effectively manage child safeguarding risks and be a child safe organisation
- promoting a child safe risk management culture within the School
- ensuring that the School's child safeguarding risk register is maintained, regularly reviewed, and updated as set out in **Procedures** below
- monitoring and evaluating the effectiveness of the School's child safeguarding risk controls
- ensuring that the School's current programs and activities and any new programs and activities are assessed to ensure that any child safeguarding risks associated with them are effectively managed and communicated to staff
- ensuring that appropriate guidance, training and information is provided to all Staff, and relevant Volunteers and Contractors, at least annually, about a number of matters, including guidance on how to identify and mitigate child safety risks in the School's environments

### The Leadership Team

The Leadership Team is responsible for:

- reviewing, in consultation with the Principal, the School's child safeguarding risk management strategies, the child safeguarding risk register and the Child Safeguarding Program in accordance with the policies and procedures set out below
- identifying and reporting to the Principal any instances of non-compliance with child safeguarding legal and regulatory requirements and any breakdowns in child safeguarding risk controls
- ensuring that appropriate resources are made available in their area of operations to allow the School's child safeguarding risk management strategies to be effectively implemented within the School
- supporting the Principal in the practical application of the School's child safeguarding risk management strategies, policies, procedures and work systems
- promoting a child safe risk management culture within the School.

### The Child Safeguarding Committee

The School's Child Safeguarding Committee is responsible for:

- promoting a child safe risk management culture within the School
- ensuring that the School's child safeguarding risk register is maintained, regularly reviewed, and updated as set out in **Procedures** below
- ensuring that the School communicates its commitment to child safety and to child safeguarding legal and regulatory compliance and ensuring that operations are consistent with the commitment to child safety
- receiving and reviewing child safeguarding risk reports

- supporting, advising and assisting the Principal and the staff in relation to effective child safeguarding risk management

### Clyde Grammar's School Policy

#### Development of Child Safeguarding Risk Management Strategies

The child safeguarding risk management strategies set out below have been developed, and are implemented, based on:

- the nature of all School environments (physical, online and off-campus)
- the operational profile of the School
- the activities that students undertake at the School (including the provision of services by Contractors or outside the School's physical environment)
- the characteristics and needs of all of our students, including age, gender mix, Aboriginal and Torres Strait Islander Students, students from culturally and linguistically diverse backgrounds, and students with disability.

In particular, the following factors have been taken into account:

- the schools culturally diverse community
- the different backgrounds, faiths and religions
- the schools location
- each students individual needs and requirements

#### Clyde Grammar's Child Safeguarding Risk Management Strategies

The School has developed and implemented the following risk management strategies to identify and mitigate our child safeguarding risks:

- **Risk management program:** The School has a **comprehensive risk management program** that was drafted in accordance with the principles and standards of the International Risk Management Standard AS/ISO 31000, for managing all risks relating to its operations, including child safeguarding risks.
- **Risk assessments:** The School conducts a risk assessment of its environments, activities and characteristics, taking into account the needs of students and applicable control measures (such as systems, policies and procedures), at least annually to ensure that all child safety risks are identified and that there aren't gaps in our child safeguarding strategies and systems that a person motivated to harm or abuse students could exploit.
- **Child Safeguarding Risk Register:** The School identifies and records all reasonably foreseeable risks of child abuse and other harm in all School environments, as well as all other risks relevant to child safeguarding, in a Child Safeguarding Risk Register, and assesses these risks with regard to the likelihood of the risk event occurring and the potential consequences if it were to occur. This risk register can be found [here](#).
- **Child Safeguarding Risk Register annual reviews:** The Child Safeguarding Risk Register is reviewed and approved at least annually by the Executive Team. These reviews include:
  - reviewing the effectiveness of child safeguarding risk control measures and evaluating the overall risk rating for all child safeguarding risks
  - analysing child safeguarding incidents that may indicate a breakdown in risks controls

- analysing any instances of non-compliance with child safeguarding legal and regulatory requirements and the systems and procedures that should be put in place to avoid any further non-compliance
- considering the need to implement risk treatments to further control risks.
- **Child Safeguarding Program:** The School has developed and implements the Child Safeguarding Program, which includes a comprehensive suite of child safeguarding policies and procedures. These policies and procedures include, in particular:
  - child safeguarding standards, set out in our **Child Safeguarding (Safety and Protection) Policy**
  - policies, procedures and guidance, set out in our **Child Safeguarding (Responding and Reporting Obligations) Policy and Procedures**, on identifying risks of child abuse and other harm in the School's environments, legal obligations, responsibilities for managing these risks, and how to report and how to respond to child safety incidents and concerns.
  - a **Working with Children Checks Policy and Procedures**,
  - a set of **Reportable Conduct Policies and Procedures**
  - a set of policies and procedures for **Child Safe Human Resources Management**.
- **Child Safeguarding Training and Information:** The School provides child safeguarding training at induction, and annual refresher child safeguarding training, for all school staff as set out in our **Child Safeguarding Training and Supervision Policy and Procedures**. Relevant Volunteers also receive child safeguarding training and/or information as set out in that Policy.
- **Child Safeguarding Officers:** The School has appointed a number of **Child Safeguarding Officers** who are "Child Safeguarding Champions" at the School.
- **Approvals for specific contexts and activities:** The School has an approvals process and/or ongoing risk management process for certain School contexts and activities (set out in Procedures below), which require/s that a specific risk assessment be undertaken and provided either to the Principal or a relevant management committee for their consideration.
- **Reporting:** The Executive Team receive regular reports regarding child safeguarding risk management and any instances of non-compliance with our policies and with legal and regulatory requirements, as well as any other information or incidents that may suggest a breakdown in child safeguarding systems, procedures and risk controls.
- **Continuous improvement:** The School is committed to a continuous improvement process which involves regular review of the child safeguarding program and child safeguarding risks to identify areas for improvement.

### **Child Safeguarding Risk Appetite**

The School has no appetite for any increase to any risk rating for child safeguarding risks.

As a result, the School regards any non-compliance with legal and regulatory requirements related to child safety and wellbeing as unacceptable and requiring of immediate rectification.

The School has no appetite for implementing any new programs or initiatives that:

- may increase the School's child safeguarding risks
- may result in a breakdown of the School's existing child safeguarding risk controls and their effectiveness.

## Procedures

### Risk Assessment, Risk Evaluation and Risk Treatment

Assessment of risk includes consideration of the effectiveness of risk controls (our current policies, procedures, systems and work practices), the likelihood of the risk happening and the consequence if the risk were to occur. Risks are then evaluated and matched to a risk matrix to determine the risk rating. The risk rating defines the level of governance oversight required and whether any additional measures ("risk treatments") are required to reduce or remove the risk.

The risk assessment methodology used at **Clyde Grammar** is outlined in detail [here](#).

The risk evaluation methodology is outlined [here](#).

Risk treatments are implemented using the methodology outlined [here](#).

### Reporting Child Safeguarding Risks

All staff members must be aware of the School's child safeguarding risk management practices and must report to the Principal or a Child Safeguarding Officer:

- any incidents, issues or concerns that may indicate a breakdown in our child safeguarding risk controls
- any new or perceived child safeguarding risks.

Contact details for our Principal regarding child safeguarding matter is [here](#).

### Risk Assessments for Specific School Contexts and Activities

The Executive Team, and any staff members who have or who have been delegated the required level of responsibility, must ensure that child safeguarding risks are considered and reviewed when there are changes to the School's operational profile or when new activities, buildings and facilities are planned and operating.

The following School contexts and activities require, as part of their approvals or ongoing risk management processes, that specific risk assessments be undertaken and provided either to the Principal or a relevant management committee for their consideration:

- **Physical Environment**  
Ongoing, periodic reviews must be undertaken of all physical School environments, to eliminate physical isolation risks such as solid classroom doors or rooms with no windows, and of any procedural controls where elimination is not possible, including random checks of obstructed or out-of-the-way locations.
- **Online Environment**  
Regular monitoring, and ongoing periodic reviews must be undertaken of the online School environment and electronic communications, to identify and eliminate online child safeguarding risks such as access controls, inappropriate sharing of information/data security, online grooming, and breaches of the School's **Child Safety Code of Conduct** and Use of Media policies and procedures.

- **Excursions and Camps**

The School has developed and implements specific policies and procedures relating to excursions and camps ensuring that child safeguarding risks specific to excursions and overnight stays are identified and controls are put in place. These can be found **on CompliSpace** We use the Consent2Go online excursion management system to identify and manage these risks.

- **Sport and Extra-Curricular Activities**

The School has developed and implements specific policies and procedures to manage child safeguarding risks specific to the variety of sporting and other extra-curricular activities at the School. These risks include the use of Casual Staff and Volunteers, maintaining professional boundaries, appropriate demonstration techniques and supervision both on School grounds and in off-site locations. These can be found **CompliLearn**.

### **Clyde Grammar's Assurance System**

The School has implemented CompliSpace Assurance as one strategy to manage the risk of child abuse and other harm in the School's environments.

CompliSpace Assurance is an online risk and compliance workflow management tool that integrates with our Child Safeguarding Program to provide a system of risk management, compliance and continuous improvement based on international standards.

Through this system, key risks and compliance obligations are captured, documented and converted into plain English questions that are assigned via email to responsible individuals for action. Each individual is provided with a calendar view of their compliance performance via an online browser.

Unactioned tasks are escalated and reported to allow the School to monitor and record its compliance performance in real time. The School also uses this risk management system as a method of evaluating and reviewing the ongoing effectiveness of the implementation of its risk measures and controls.

### **The School's Child Safeguarding Risk Register**

Our commitment to keeping children and young people safe cannot be achieved without effectively managing child safeguarding risks. As a result, the School has developed a Child Safeguarding Risk Register to actively monitor child safeguarding risks and their mitigation.

The Child Safeguarding Risk Register ensures that the Executive Team has clear visibility and oversight of child safeguarding risks in the School, and it enables our School to effectively manage our legal and regulatory child safeguarding obligations under Ministerial Order 1359.

Our Child Safeguarding Risk Register is reviewed at least annually, as well as following any child safeguarding incidents, by the Executive Team. These reviews involve reviewing the child safeguarding risks that are included in the Child Safeguarding Risk Register and the effectiveness of risk controls for each child safeguarding risk. Where new child safeguarding risks are identified, these are discussed and added to the Child Safeguarding Risk Register and risk controls for the new risks are identified and implemented.

Our Child Safeguarding Risk Register can be found **here**.

#### **Implementation**

The Child Safeguarding Risk Management Policy and Procedures is made available to all Staff via the School's intranet. Training about the Child Safeguarding Risk Management Policy and Procedures is included in induction and annual refresher training for Staff and relevant Volunteers and Contractors.

For more information, refer to **Child Safeguarding Training and Supervision Policy and Procedures**.

The Child Safeguarding Risk Management Policy and Procedures is also communicated to Staff, Volunteers, Contractors, parents/carers, students and the wider School community.

It is also available in hard copy by request.

### Consequences for Breach of the Child Safeguarding Risk Management Policies and Procedures

Clyde Grammar enforces this Policy and its Procedures. In the event of any non-compliance, we will instigate a review that may result in a range of measures including (depending on the severity of the breach):

- remedial education
- counselling
- increased supervision
- the restriction of duties
- suspension
- in the case of serious breaches, termination of employment, contract or engagement.

For more information, refer to **Compliance and Breach Policy and Procedures (Child Safeguarding)**.

### Policy Review

A review of the Child Safeguarding Risk Management Policy and Procedures is conducted **2 years** or earlier if required, such as due to changes in legislation.

### Clyde Grammar Policy and Procedure Linkages

- **Regular Review and Continuous Improvement Policy and Procedures**
- **Clyde Grammar's Risk Management Program**
- **Clyde Grammar's Child Safeguarding Program in full**
- Consent2Go online excursion

### Source of Obligation

Standard 2 of the Victorian Child Safe Standards requires that child safety and wellbeing are embedded in Clyde Grammar's leadership, governance and culture. In particular, the School's governance arrangements must facilitate implementation of its child safety and wellbeing policies at all levels.

To implement this Standard, clause 6 of Ministerial Order 1359 requires the School to:

- develop and implement risk management strategies that:
  - focus on preventing, identifying and mitigating risks related to child safety and wellbeing in the School's environments
  - take into account a number of matters specific to the School.
- record the risks and the actions that the School has taken or will take to reduce or remove the risks (risk controls and risk treatments).



- as part of its risk management strategy and practices, monitor and review the risks annually, and evaluate the effectiveness of the implementation of its risk controls

Clause 12 of Ministerial Order 1359 requires the School to ensure that, among other things, appropriate guidance, training and information is provided, at least annually, to:

- the individual members of the governing body about:
  - individual and collective obligations and responsibilities for implementing the Child Safe Standards and managing the risk of child abuse
  - child safety and wellbeing risks in the School's environments
  - the School's child safety policies, procedures and practices
- school staff about a number of matters, including, guidance on how to identify and mitigate child safety and wellbeing risks in the school environment without compromising a student's right to privacy, access to information, social connections and learning opportunities.

### References and Resources

- Victorian Registration and Qualifications Authority, [Child Safety Risk Management Strategies](#)
- Department of Health and Human Services, [Resource 6: Strategies to identify and reduce or remove risks of child abuse](#)

### Policy Administration

<b>Status</b>	Approved by the Board on 8 February, 2023
<b>Person Responsible</b>	The Principal
<b>Approver(s)</b>	The CSV Board is responsible for ensuring that the policy and its procedures are reviewed and updated as needed, and for approving this policy
<b>Approval Date</b>	8 February, 2023
<b>Version Number</b>	1.0
<b>Version History</b>	Created 2022
<b>Review Frequency</b>	A review of this policy and its procedures is conducted at least every 2 years or earlier if required, such as due to changes in legislation
<b>Next Review Date</b>	January 2023
<b>Risk Rating</b>	High
<b>Location</b>	CompliSpace