



# Edinburgh College Child Safe Risk Management Strategies Policy & Risk Management

## Document History

This policy is to be ratified by the School Council on April 2022

The life cycle of this policy is three years.

## Rationale

Edinburgh College, to be certain that our risk management strategies meet the child safety requirements set out in Ministerial Order No. 870, and the current 2016 Child Safe Standard 6, identifies, manages, monitors and evaluates risks to child safety before, during and after school, in on-site College environments, as well as off-campus educational environments.

*Special Note:* To be reviewed as a system in May/June 2022 to reflect the new 2021 Child Safe Standards

## General

A child safety risk management strategy is a formal and structured approach to managing risks associated with child safety.

Effective risk management strategies need to be transparent, well understood and diverse, and take account of the increased level of risk associated with the specific nature of some activities and the vulnerability of particular groups, such as ATSI students, culturally and linguistically diverse students, disabled students, and other vulnerable students, including our full fee paying overseas students (FFPOS).

Our strategies, processes and procedures are outlined in various documents, including this one, our *Child Safe Protection Policy*, *Child Safe Protection Code of Conduct*, *Duty of Care Policy* (which includes Duty of Care to Prevent Child Abuse), and various other child safe policies, process and procedure documents.

### Categories of risk considered include:

1. **Predatory risks:** Involve persons who may become adept at creating opportunities to sexually abuse and avoid detection:
  - Predatory persons are persistent; they are calculating; they have an unambiguous sexual interest in children; they are prepared to invest effort, but only if necessary
2. **Opportunistic risks:** Involve persons who may sexually abuse in low-risk, low- effort situations:
  - Opportunistic persons have a general propensity to exploit opportunities for personal gain at the expense of others, but are unlikely to invest significant effort in creating opportunities; they have no special/unusual sexual interest in children; they may sexually abuse in low-risk, low-effort situations.

3. **Situational risks:** Involve persons who may sexually abuse in a specific set of circumstances:
  - They are persons with conventional social values; they usually have adequate self-control, and are sensitive to informal social controls; they may sexually abuse in a specific set of circumstances.
4. **Environment risks:** Environments that create child safety risks.
  - The College risk management process is documented in our Risk Register, which is reviewed annually to ensure that the risk management strategies are effective and dynamic, that is, able to change over time, as new risks arise, and others may no longer be relevant.

**The College risk management processes:**

1. Assess, identify and document risks in relation to child safety, outline a plan to mitigate risks, and document risk management strategies where necessary.
2. Identify the actions the College has in place, those it proposes to take, and describe a monitoring and review process that ensures the currency of our approach.
3. Identify and reduce, or remove, risks of child abuse.

**Identifying and managing risk typically involves the following five steps and considerations:**

1. among the following people:
  - registered teachers and educational support staff
  - chaplains, pastors, welfare staff or those in pastoral care roles and relationships with students
  - other students, including adult students 18 years or older
  - education practicum students
  - administration and support staff
  - contractors, such as specialists delivering services to students e.g. VET units, music, media or recreation lessons or activities
  - volunteers
  - facilities staff, such as maintenance staff, grounds staff, bus drivers, canteen staff, cleaning staff
  - visitors to the school or other persons that may have access to students
  - homestay guardians appointed for full fee paying overseas students.
2. Identifying the school's child safety risks across the range of school environments, which include:
  - classrooms and learning environments
  - specialist facilities, e.g. kitchens, science labs, technology, music and art
  - VET and VCAL (Campus applicable) facilities on campus or off-site
  - staff workplaces and offices
  - recreation areas, playgrounds
  - sporting facilities on campus and off-site
  - student change rooms and locker areas

- transport facilities and locations, e.g. buses, bus stops (excluding public transport)
- excursion and camp locations
- competitions
- work experience
- online learning environments, and through electronic media
- home environments of overseas students

3. Identifying any existing risk mitigation measures or existing controls
4. Assessing and rating 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
5. If the risk rating is more than the 'acceptable level', identifying further risk management strategies through additional treatments or other prevention, detection or mitigation strategies and then re-assess the risk (once in place these treatments will then become controls)

# Edinburgh College Child Safe Risk Register

## Risk Rating Matrix

Risk Taking	Consequences				
	Insignificant	Minor	Moderate	Major	Severe
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
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(Worst Case)	Existing risk management strategies or existing controls	Likelihood/Consequence of risk	Current risk rating	New risk management strategies or treatments	Who is responsible?	Target risk rating


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<b>Risk Event or Environment</b> (Worst Case)	<b>Existing risk management strategies or existing controls</b>	<b>Likelihood Consequence of risk</b>	<b>Current risk rating</b>	<b>New risk management strategies or treatments</b>	<b>Who is responsible?</b>	<b>Target risk rating</b>
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<p>No organizational culture of child safety, e.g. lack of leadership, a lack of public commitment and frequent negative messages</p>	<ul style="list-style-type: none"> <li>• Child Safe Protection Policy</li> <li>• Statement of Commitment to Child Safety</li> <li>• Child Safe Code of Conduct</li> <li>• Strategies developed to embed culture of child safety</li> <li>• Child Safe Protection Policy and Statement of Commitment to Child Safety is publicly available on the College website</li> <li>• This Policy and Register</li> </ul>	<p>Rare</p>	<p>Moderate</p>	<p>Low</p>	<ul style="list-style-type: none"> <li>• Ongoing review of strategies to embed organisational culture of child safety</li> <li>• Ongoing Child Safe Training and Professional learning for all staff and Stakeholders</li> <li>• Annual training for all Staff categories, and College Council in the child abuse risks identified in this policy and register</li> </ul>	<p>Principal, College Council Chair Heads of Campus Heads of School</p>	<p>Low</p>
<p>Inappropriate behaviour is not reported and addressed by College leaders and teachers</p>	<ul style="list-style-type: none"> <li>• Child Safe Protection Policy</li> <li>• Mandatory reporting</li> <li>• Child Safe Code of Conduct</li> <li>• Clear child safety reporting procedures</li> <li>• Performance Management and Development procedures</li> <li>• Keeping Safe: Child Protection Curriculum is in mid stages of implementation</li> <li>• PB4L Behaviour Management strategy implemented</li> <li>• This Policy and Register</li> </ul>	<p>Rare</p>	<p>Severe</p>	<p>Medium</p>	<ul style="list-style-type: none"> <li>• Ongoing review of strategies to embed organisational culture of child safety</li> <li>• Annual Mandatory Reporting training for staff – see DET eLearning mandatory reporting module</li> <li>• Annual training for Staff in the child abuse risks identified in this policy and register</li> <li>• Strategies to provide students with understanding of abuse and giving them voice</li> <li>• PB4L Behaviour Management strategy implemented</li> </ul>	<p>Principal College Council Chair HR Adventist Schools Victoria Heads of campus Heads of School Learning and Teaching Coordinator PB4L Coordinators</p>	<p>Medium</p>

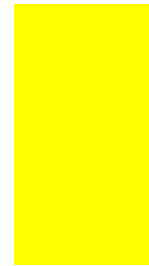


<p>Inappropriate behaviour is not reported by College students to leaders and teachers</p>	<ul style="list-style-type: none"> <li>• Child Safe Protection Policy Clear child safety reporting procedures</li> <li>• Keeping Safe: Child Protection Curriculum is in mid stages of implementation</li> <li>• PB4L Behaviour Management strategy implemented</li> <li>• This Policy and Register</li> </ul>	<p>Possible</p>	<p>Major</p>	<p>High</p>	<ul style="list-style-type: none"> <li>• Continue to review and renew policies, handbooks and strategies regularly</li> <li>• PB4L Behaviour Management strategy implemented</li> </ul>	<p>Principal Heads of campus Heads of School Learning and Teaching Coordinator PB4L Coordinator</p>	<p>Low</p>
<p>Unquestioning trust of long term employees and contractors or norms</p>	<ul style="list-style-type: none"> <li>• Strategies developed to embed culture of child safety</li> <li>• Child Safe Protection Policy</li> <li>• Clear child safety reporting procedures</li> <li>• Child Safe Code of Conduct</li> <li>• Training for staff in the Child Safe Standards</li> <li>• This Policy and Register</li> </ul>	<p>Unlikely</p>	<p>Major</p>	<p>Medium</p>	<ul style="list-style-type: none"> <li>• Ongoing annual training for staff in the Child Safe Standards</li> <li>• Annual refresher mandatory reporting training for staff – see DET eLearning mandatory reporting module</li> <li>• Ongoing training in the use of the Response to Abuse reporting template</li> <li>• Annual training for Staff in the child abuse risks identified in this policy and register</li> </ul>	<p>Principal, College Council Chair Heads of Campus Heads of School</p>	<p>Medium</p>
<p>Recruitment of an inappropriate person</p>	<ul style="list-style-type: none"> <li>• Interview (ASV)</li> <li>• Pre-employment qualifications check</li> <li>• Pre-employment reference check includes asking about child safety</li> <li>• WWCC (as appropriate)</li> <li>• Victorian Institute of Teaching registration check</li> <li>• Child Safe Code of Conduct</li> <li>• This Policy and Register</li> </ul>	<p>Rare</p>	<p>Major</p>	<p>Medium</p>	<ul style="list-style-type: none"> <li>• Ensure required ASV processes followed for recruitment of education staff, including CRTs</li> </ul>	<p>Director of Education, ASV Principal College Council Chair Heads of Campus</p>	<p>Low</p>

Engagement with children online	<ul style="list-style-type: none"> <li>• Child Safe Code of Conduct</li> <li>• Strategies developed to embed culture of child safety</li> <li>• eLearning School status</li> <li>• Cybersafety teaching and learning in place with Digital tech. teaching staff</li> <li>• Acceptable Use Agreements – Staff and Students</li> <li>• Several platforms available for teacher/student online learning engagement</li> <li>• Online monitoring system in place</li> </ul>	Possible	Moderate	Medium	<ul style="list-style-type: none"> <li>• Continue to train students and staff to detect inappropriate behaviour</li> <li>• Continue to ensure appropriate settings on all student technologies</li> <li>• Continue to train all teaching staff to address Cybersafety in teaching and learning</li> <li>• Keeping Safe: Child Protection Curriculum is in mid stages of implementation Continue strategic roll out.</li> <li>• Specify particular approved platforms for teacher/student online learning engagement</li> </ul>	Principal Heads of Campus School Learning and Teaching Coordinators	Low
Unknown people and environments at excursions and camps	<ul style="list-style-type: none"> <li>• Child Safe Code of Conduct</li> <li>• Strategies developed to embed culture of child safety Clear child safety reporting procedures</li> <li>• Risks assessed within the EOTC procedure and proforma</li> <li>• Excursions and camps approved through (EOTC form) in advance through ADCOM and College Council, and for overnight camps, the ASV Board of Directors</li> </ul>	Rare	Major	Medium	<ul style="list-style-type: none"> <li>• Continued assessment of new or changed environments for child safety risks</li> <li>• Continue to ensure Child Safe Code of Conduct and strategies apply in all school contexts</li> <li>• Continue to ensure overnight excursions and camps are approved (EOTC form) at least 6 weeks in advance through ADCOM, College Council, and ASV Board of Directors</li> </ul>	ADCOM College Council Chair ASV BOD	Low

<p>Children alone with one other person unsupervised</p>	<ul style="list-style-type: none"> <li>• Strategies developed to embed culture of child safety</li> <li>• Duty of Care policy</li> <li>• Child Safe Protection Policy</li> <li>• Child Safe Code of Conduct</li> <li>• Clear windows in walls and doors to enable visibility of occupants</li> </ul>	<p>Rare</p>	<p>Major</p>	<p>Medium</p>	<ul style="list-style-type: none"> <li>• Continued assessment of new or changed environments for child safety risks</li> <li>• Continue to ensure Duty of care policy and strategies apply in all school contexts</li> <li>• Continue to ensure Child Safe Code of Conduct and strategies apply in all school contexts</li> <li>• Open all window and door blinds during school hours</li> <li>• Continued assessment of online environments for child safety risks</li> <li>• Continue to ensure Duty of care policy and strategies apply in online contexts</li> </ul>	<p>Principal Heads of Campus Heads of School</p>	<p>Low</p>
<p>Children attending extended periods of online learning as a consequence of COVID19 and the introduction of remote learning</p>	<ul style="list-style-type: none"> <li>• Strategies developed to embed culture of child safety</li> <li>• Duty of Care policy</li> <li>• Child Safe Protection Policy</li> <li>• Child Safe Code of Conduct</li> <li>• Internet Acceptable Use Policy</li> <li>• ICT Acceptable Use Agreements – Student, Staff</li> <li>• Remote Learning Guidelines – Professional Expectations</li> <li>• Regular communication with parents/carers</li> <li>• Supporting Your Child During Off Campus Learning</li> <li>• Pastoral care and student welfare strategies e.g. Chaplains, counsellor services</li> </ul>	<p>Possible</p>	<p>Moderate</p>	<p>Medium</p>	<ul style="list-style-type: none"> <li>• Ensure parents are supported with strategies to monitor their child's online environment</li> <li>• Ensure staff are supported with strategies to remain professional and child safe when engaging with students during online learning, and other necessary digital learning communications</li> </ul>	<p>Principal Heads of Campus Heads of School Deputy HoS Welfare Officer/s Chaplains Teachers</p>	<p>Low</p>

Unsupervised recreational or other activities	<ul style="list-style-type: none"> <li>Strategies developed to embed culture of child safety</li> <li>Duty of Care policy</li> <li>Duty rosters</li> <li>OSHC – Before and after school policies</li> </ul>	Rare	Moderate	Low	<ul style="list-style-type: none"> <li>Monitor student welfare</li> </ul>		Principal Heads of Campus Heads of School	Low	
Vulnerability of students due to unknown personal issues	<ul style="list-style-type: none"> <li>Strategies developed to embed culture of child safety</li> <li>Pastoral care and student welfare strategies e.g. Chaplains, counsellor services contracted</li> <li>Referral to applicable bodies and organisations, Child First, Headspace etc.</li> <li>PB4L strategies are implemented in Primary</li> <li>Keeping Safe: Child Protection Curriculum is in mid-end stages of implementation (2020)</li> </ul>	Possible	Moderate	Medium	<ul style="list-style-type: none"> <li>Continue to review and renew all policies, handbooks and strategies regularly</li> <li>Work to employ an on-site counsellor</li> <li>PB4L Behaviour Management strategy implemented</li> <li>Keeping Safe: Child Protection Curriculum is in mid-end stages of implementation</li> <li>Continue strategic roll out.</li> </ul>		Principal Heads of Campus Heads of School Chaplains	Low	
Ad-hoc contractors (e.g. maintenance), visitors on the premises	<ul style="list-style-type: none"> <li>Child safe environments Information and awareness for visitors, staff, volunteers and contractors</li> <li>WWCC if working in close contact with children</li> <li>Child Safe Code of Conduct</li> <li>Sign in and out procedures</li> <li>Adequate monitoring</li> <li>CCTV in strategic areas, and 'hot spot' areas, e.g. locker bays</li> </ul>	Unlikely	Moderate	Medium	<ul style="list-style-type: none"> <li>Refresher training for frequent contractors</li> <li>Maintain ongoing training for volunteers</li> <li>Enhance sign in and</li> </ul>		Principal, Heads of Campus Office Manager	Low	



out procedures to  
include acceptance of  
Child Safe Code of  
Conduct

