Policy Category: Child Safety
Status: Adopted - Board

Child Safety Risk Management Policy and Procedures

Contents

1. Policy Objective

1.1. Purpose

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

While Child Safety risks within the operations of a school can never be completely eliminated, the School actively implements risk management practices to ensure that Child Safety risks are reduced.

Our Child Safe Risk Management Policy and Procedures outline our approach to managing Child Safety risks. This policy aligns with the directions on Child Safety provided by Lutheran Education VIC, NSW, TAS and ACT Ltd (LEVNT) to provide minimum directions, promote consistency, good governance and best practice in our system and School policy.

1.2. Scope

Standards 2 and 9 of the Victorian Child Safe Standards require the School Board 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.

This Policy and its Procedures apply to all Staff, Volunteers and Contractors (together referred to as "Staff" and "staff members" for the purposes of this Policy and its Procedures), as well as School Board Directors.

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).

2. Policy Principles

2.1. Policy Principles

School Board Directors and the School are committed to ensuring the safety, wellbeing, and participation of all children and young people under our care. We have zero tolerance for child abuse.

2.2. Policy Roles and Responsibilities

Identifying and managing Child Safety 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 Safety Responsibilities, the following people have particular responsibilities under this Policy and its Procedures.

Everyone employed or volunteering at the School has a responsibility to understand the important and specific role they play individually and collectively to ensure safety culture is at the forefront of all they do and every decision they make.

The School has allocated roles and responsibilities for child safety risk management as follows:

Role	Responsibility
Lutheran Education VIC, NSW, TAS and ACT Ltd (LEVNT)	LEVNT are responsible for providing any applicable Lutheran Education minimum directions on risk management and policy content and principles, support in form of templates and tools to direct efficiency and guide consistent, best practice and compliance policy and procedure. Ensuring for Child Safety risk management: o LEVNT has a Child Safety risk register in which system wide Child Safety risks and risk controls are recorded. o Reviewing risk ratings for these Child Safety risks, risk movement, new and emerging Child Safety risks and the proposed controls for these risks that require LEVNT action and monitoring. o Receiving escalation of any critical rated Child Safety risk from the School, or theme or trend that is emerging or escalating related to high rated Child Safety risk/s.
School Board	School Board Directors are responsible for: • Reviewing and approving the School's Child Safety risk register including management strategies. • Receiving reporting and assurance on the child safety risk mitigations, emerging or escalating themes or trends. • Monitoring the child safe risk management culture within the School, including setting risk appetite and tolerances. • Establishing clear lines of responsibility and delegations with regard to Child Safety risk management. • Ensuring that the School communicates its commitment to child safety and to Child Safety legal and regulatory compliance and ensuring that operations are consistent with the commitment to child safety. • Promoting a child safe risk management culture within the School. • Ensuring their Terms of Reference capture their accountabilities for child safety risk management. • Ensuring that the School's Child Safety risk register is maintained, regularly reviewed, reported to the School Board Directors, and updated as set out in in this Policy. • Ensuring that the School communicates its commitment to child safety and to Child Safety legal and regulatory compliance and ensuring that operations are consistent with the commitment to child safety. • Receiving and reviewing Child Safety risk reports. • Supporting, advising, and assisting the Principal and the Leadership team in relation to effective Child Safety risk management.

Role	Responsibility
Principal	The Principal is responsible for: • Understanding the Child Safety risks relevant to the School, based on the School’s operational profile. • Developing, and ensuring the effective implementation of, the School’s Child Safety risk management strategies • Implementing the risk strategies assigned to the Principal. • Reviewing and approving any changes to the School’s Child Safety risk management strategies. • Promoting a child safe risk management culture within the School. • Establishing clear lines of responsibility and delegations with regard to Child Safety risk management. • Ensuring that the School communicates its commitment to child safety and to Child Safety legal and regulatory compliance and ensuring that operations are consistent with the commitment to child safety. • Ensuring that the School identifies and takes steps to mitigate Child Safety risks, including by: o Ensuring that the School has a Child Safety risk register in which Child Safety risks and risk controls are recorded. o Receiving regular reports regarding Child Safety risk management at the School and the School’s Child Safety risk register. o Monitoring and evaluating the effectiveness of the School’s Child Safety risk controls. o Reviewing risk ratings for Child Safety risks, risk movement, new and emerging Child Safety risks and the proposed controls for these risks. o Receiving regular reports regarding Child Safety legal and regulatory compliance at the School. o Providing reporting to the School Board and LEVNT Executive Director to facilitate their monitoring and oversight, including meeting the reporting obligations in this Policy. • Ensuring that appropriate guidance, training, and information is provided, at least annually, to: o School staff, including Direct Contact Contractors, about a number of matters, including guidance on how to identify and mitigate child safety and wellbeing risks in the School’s environments.
School Leaders	The School Leaders are responsible for: • Reviewing, in consultation with the Principal, the School’s Child Safety risk management strategies, the Child Safety risk register and the Child Safety Program in accordance with the policies and procedures set out below. • Identifying and reporting to the Principal any instances of non-compliance with Child Safety legal and regulatory requirements and any breakdowns in Child Safety risk controls. • Ensuring that appropriate resources are made available in their area of operations to allow the School’s Child Safety risk management strategies to be effectively implemented within the School. • Supporting the Principal in the practical application of the School’s Child Safety risk management strategies, policies, procedures, and work systems. • Promoting a child safe risk management culture within the School
School Staff	• All staff are to be familiar with and actively participate in the child safety risk management strategies and procedures of the School.

2.3. Policy Definitions

Risk – the term "risk" means, in simple terms, the possibility of something happening.

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 – is a particular phrase used in Ministerial Order 1359, and is defined as "*an individual working in a School environment who is*:

- *Directly engaged or employed by a School governing body.*
- *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'*.

2.4. Development of Child Safety Risk Management Strategies

The Child Safety 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 our students, including age, gender mix, Aboriginal and Torres Strait Islander Students, students from culturally and linguistically diverse backgrounds, and students with disability.

2.5. Child Safety Risk Management Strategies

The School has developed and implemented the following risk management strategies to identify and mitigate our Child Safety 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 Safety risks. (Our risk management practices are further outlined in our Risk Management framework).

- **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 Safety strategies and systems.

- **Supervision:** The School ensures there is active supervision for all students and that staff working with our students understand their obligations for duty of care, supervision ratios and active supervision.

- **Child Safety Risk Register**: The School identifies and records all reasonably foreseeable risks of child safety, abuse, and other harm in all School environments, in a Child Safety 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. Mitigation strategies and any identified planned improvement plans are documented for risks identified.

- **Child Safety Risk Register Annual Reviews**: The Child Safety Risk Register is reviewed, monitored and approved annually by the School Board, and reviewed by the Principal and Leadership team at least every 6 months. These reviews include:
    - Engaging with staff to input into identification, assessment, and mitigation of child safety risks.
    - Reviewing the effectiveness of Child Safety risk control measures and evaluating the overall risk rating for all Child Safety risks.
    - Analysing Child Safety incidents that may indicate a breakdown in risks controls.
    - Analysing any instances of non-compliance with Child Safety 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 Safety Program**: The School has developed and implements the Child Safety Program, which includes a comprehensive suite of Child Safety policies and procedures.

- **Child Safety Training and Information**: The School provides Child Safety training at induction, and annual refresher Child Safety training, for all School staff. Relevant Volunteers and Contractors also receive Child Safety training and/or information as set out in that Policy. Policy, procedures and enabling systems are implemented to provide for accessibility and awareness of child safety risk management.

- **Child Safety Agenda:** Standing agenda items are on all (staff, leadership, and governance) meetings to promote child safety culture and provide opportunity to discuss child safety risk management.

- **Child Safety Officers**: The School has appointed a number of Child Safety Officers who are promoting child safety culture and awareness 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 our Risk Management Policy), which require/s that a specific risk assessment and risk management plan be undertaken and provided either to the Principal or their delegate for their review and approval.

- **Reporting**: The School Board and the Executive Team receive regular reports regarding Child Safety 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 Safety systems, procedures, and risk controls.

- **Continuous Improvement:** The School and the School Board Directors are committed to a continuous improvement process which involves regular review of the Child Safety program and Child Safety risks to identify areas for improvement.

- **Incident Post Review:** processes are instituted to provide for review of relevant policy, processes and risk mitigations following any child safety incident.

2.6. Child Safety Risk Appetite

The School has zero tolerance for child abuse.
The School has no appetite for any increase to any risk rating for Child Safety risks.

The School has no appetite for non-compliance with legal and regulatory requirements related to child safety and wellbeing regarding these 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 Safety risks.
- May result in a breakdown of the School's existing Child Safety risk controls and their effectiveness.

2.7. Reporting Child Safety Risks

All staff members must be aware of the School's Child Safety risk management practices and must report to the Principal, School Leader, Risk Manager and/or Child Safety Officer:

- Any incidents, issues or concerns that may indicate a breakdown in our Child Safety risk controls.
- Any new or perceived, escalating, or emerging Child Safety risks.

2.8. Risk Assessments for Specific School Contexts & Activities

The Executive Team, and any staff members who have or who have been delegated the required level of responsibility, must ensure that Child Safety 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 child safety risk management processes, that specific risk assessments be undertaken and provided either to the Principal or their delegate [or a relevant management committee for their consideration]:

Physical Environment

Ongoing, periodic reviews must be undertaken of all physical School environments, to eliminate child safety 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 Safety 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 ICT policies and procedures.

Trips, Excursions and Camps

The School has developed and implements specific policies and procedures relating to trips, excursions and camps ensuring that Child Safety risks specific to excursions and overnight stays are identified and controls are put in place. (This is outlined in our Trips, Excursions and Camps Risk Management procedures)

We use the Consent2Go online excursion management system to identify and manage these risks.

For any new, changed, or high-risk activity we require additional consultation and review of the risks for this setting with the Principal or their delegate. This will then be updated into our online excursion management system if approved.

Work Placement

The School has developed and implements specific policies and procedures relating to work experience placements, including the completion of the Student Work Experience Checklist that outlines key Child Safety requirements. This complies with the Ministerial Order 382.

Sport and Extra-Curricular Activities

The School has developed and implements specific policies and procedures to manage Child Safety risks specific to the variety of sporting and other extra-curricular activities at the School. This includes for staff (including casual, sports coaches, volunteers and contractors engaged in these activities) the maintaining of professional boundaries, awareness of appropriate demonstration techniques and active supervision both on School grounds and in off-site locations.

2.9. School Risk System

The School has implemented the record keeping of the capture and monitoring of our risk mitigations and controls in the School risk systems and registers. Risks and mitigations are recoded on the School's Risk Register.

2.10. The School Child Safety Risk Register

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

The Child Safety Risk Register ensures that School Board Directors and the Leadership Team have clear visibility and oversight of Child Safety risks in the School, and it enables our School to effectively manage our legal and regulatory Child Safety obligations under Ministerial Order 1359.

Our Child Safety Risk Register is reviewed annually by the School Board, monitored by our Board Sub Committee and at least every six months, as well as following any Child Safety incidents, by the Leadership Team. These reviews involve reviewing the Child Safety risks that are included in the Child Safety Risk Register and the effectiveness of risk controls for each Child Safety risk. Where new Child Safety risks are identified, these are discussed and added to the Child Safety Risk Register and risk controls for the new risks are identified and implemented.

2.11. Implementation

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

The Child Safety Risk Management Policy and Procedures is also communicated to Staff, Volunteers, Contractors, parents/carers, students, and the wider School community also in summary in the Child Safety and Wellbeing Policy, which is available on our public website, as well as in our staff handbook and parent handbook.

3. Policy Compliance

3.1. Policy Breach

As policy documents provide direction and protection for the staff, parents, and students at School it is an important requirement that those that are high and medium risk contain a statement on the implications of a breach.

All breaches, near misses and risks related to this policy should be reported to the Principal: principal@scs.vic.edu.au

Compliance with this policy will be monitored by the Principal and Business Manager and this may include independent audits and reviews.

4. Related Policies, Procedures and Legislation

4.1. Sunshine Christian School Policy and Procedure Linkage

- Child Safety and Wellbeing Policy and Procedures
- Child Safety Code of Conduct
- Child Safety and Wellbeing Reporting Policy and Procedure
- Duty of Care
- Risk Management Framework
- Trips, Camps and Excursion Risk Management procedures

4.2. Lutheran Education Policy Linkage

- LEVNT Child Safety Risk Management Policy template

4.3. Related Legislative Instruments

- Ministerial Order 1359

Source of Obligation: Standard 2 of the Victorian Child Safe Standards requires that child safety and wellbeing are embedded in the School 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 School Board Directors 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 and the Boarding House'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 Board Directors to ensure that, among other things, appropriate guidance, training, and information is provided, at least annually, to:

- The individual members of the School Board 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 [and Boarding House's] environments.
  - The School 's child safety policies, procedures, and practices.
- School staff [and School boarding premises 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.

4.4. Further Information

For further information about the way the School manages child safety risk management, the first point of contact is with the Principal.

Policy Control & Approval Information

Policy Category	Policy Risk Rating	Approver	Date Approved	Next Review
Child Safety	High	Board	29/04/2026	04/YYYY