



Geelong Lutheran College is committed to providing a safe environment for all our students when they are in the care of the College.

Geelong Lutheran College 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 College is keeping children and young people safe.

### **Definitions**

**The College:** Geelong Lutheran College St John's Newtown and Armstrong Creek

**Parents:** Parents, Guardians and Caregivers

**Risk:** The term *risk* means, in simple terms, the possibility of something causing harm

**Risk Management:** *Risk Management* is the general process of identifying and assessing risks, followed by the application of resources to minimise, monitor, and control the probability and/or the impact of these unfortunate events.

### **Rationale**

Clause 12 of Ministerial Order 1359 requires that College Board develops and implements risk management strategies regarding child safety in the College's environments and sets out particular requirements that must be met when doing so.

While child safety risks within the operations of a school can never be completely eliminated, Geelong Lutheran College actively implements risk management practices to ensure that child safety risks are reduced.

The Child Safety Risk Management Policy outlines our approach to managing these risks.

### **Responsibilities for Child Safety Risk Management**

Identifying and managing child safety risks is everyone's responsibility. All adults in the College 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 section of the Child Safety Program.

#### **College Board:**

The College Board is responsible for:

- Understanding the child safety risks relevant to the College
- Developing, and ensuring the effective implementation of, the College's Child Safety Risk Management strategies (noting that College Board has assigned responsibility for implementing the strategies to the Head of College)
- Reviewing and approving any changes to the College's Child Safety Risk Management strategies
- Promoting a Child Safety Risk Management culture within the College
- Establishing clear lines of responsibility and delegation with regard to child safety management
- Ensuring that the College 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 College identifies and takes steps to mitigate child safety risks, including by:



- Ensuring that the College has a Child Safety Risk Register (College Intranet) in which child safety risks and risk controls are recorded
- Receiving regular reports regarding Child Safety Risk Management at the College and the College's Child Safety Risk Register
- Monitoring and evaluating the effectiveness the College's child safety risk controls
- Reviewing risk ratings for child safety risks, risk movement, new and emerging child safety risks and the proposed controls for these risks
- Receiving regular reports regarding child safety and protection legal and regulatory compliance at the College
- Ensuring that the appropriate guidance and training is provided to the individual members of College Board and College staff, at least annually, about Child Safety Risk Management and the College's current child safety standards (noting the College Board has assigned responsibility for ensuring that College staff receive this guidance and training to the Head of College)

**Head of College:**

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

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

**Senior Management:**

The Senior Management Team are responsible for:

- reviewing, in consultation with the Head of College, the College'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 Head of College 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 College's Child Safety Risk Management strategies to be effectively implemented within the College



- supporting the Head of College in the practical application of the College's Child Safety Risk Management strategies, policies, procedures and work systems
- promoting a Child Safety Risk Management culture within the College

### Development of Child Safety Risk Management Strategies

The Child Safety Risk Management strategies below have been developed, and implemented, based on:

- the nature of all College environments (physical, online and off-campus)
- the operational profile of the College
- the activities students undertake at the College (including the provision of services by Contractors or outside the College'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

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

### Geelong Lutheran College's Child Safety Risk Management Strategies

The College has implemented the following Child Safety Risk Management strategies to ensure that the College maintains a proactive approach to our duty of care to protect students from harm and to comply with our child safety legal and regulatory obligations.

**Risk Management Program:** The College 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.

**Risk Assessments:** The College conducts a risk assessment of its environments and activities, taking into account the characteristics and 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 that a person motivated to harm or abuse students could exploit.

**Child Safety Risk Register:** The College identifies and records all reasonably foreseeable risks of child abuse and other harm in all College environments, as well as all other risks relevant to child safety, 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 was to occur. The Child Safe Risk Register is available on the College Intranet.

**Child Safety Risk Register Annual Reviews:** The Child Safety Risk Register is reviewed annually by College Board and at least annually by Leadership Team. This review includes:

- 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 College has developed and implemented this Child Safety Program, which includes a comprehensive suite of child safety policies and procedures. These policies and procedures include, in particular:

- child safety standards, set out in our Child Safe Policy
- Policies, procedures and guidance, set out in Responding to and Reporting Child Safety Incidents or Concerns, on identifying risks of child abuse and other harm in the College environment, 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
- a Reportable Conduct Policy and Procedures
- a set of Policies and Procedures for Child Safety Human Resources Management

**Child Safety Training:**

- Child Safety Training is provided at induction, and at annual refresher child safety training, for all staff

**Child Protection Officers:**

- The College has appointed a number of Child Protection Officers who are child safety champions at the College

**Approvals for Specific Contexts and Activities:** The College has an approvals process and/or ongoing risk management process for certain College contexts and activities (set out in the Child Safety Risk Management Procedures below), which require that a specific risk assessment be undertaken and provided either to the Head of College or a delegate for their consideration.

**Reporting about Child Safety Risk Management:** College Board and Senior Management 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 College and College Board 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.

**Child Safety Risk Appetite**

The College has no appetite for any increase to any risk rating for child safety risks. As a result, the College regards any non-compliance with legal and regulatory requirements related to child safety and child protection as unacceptable and requiring immediate rectification.

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

- may increase the College's child safety risks
- may result in a breakdown of the College's existing child safety risk controls and their effectiveness

**Child Safety Risk Management Procedures**

Identifying and Internal Reporting of Child Safety Risks

Senior Management and College Board consider, as part of their annual reviews of the Child Safety Risk Register, all currently identified child safety risks, whether these reflect all of the College's current child safety risks and whether there are any additional child safety risks that should be added to the Child Safety Risk Register.



In addition, child safety risks at the College may be identified during reviews of the Child Safety Program as a whole, which:

- consider whether a consistent child safety issue is being regularly raised in complaints and/or other feedback from the College community
- require systemic reviews and/or a root cause analyses of child safety incidents or concerns that occur at or involve the College

For more information, refer to Regular Reviews and Continuous Improvement.

All staff members must be aware of the College's Child Safety Risk Management practices and must report to the Head of College or a Child Protection Officer:

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

Contact details for our Child Protection Officers are listed on the main Staffroom Noticeboard:

St John's Newtown Campus

(03) 5221 5221

Armstrong Creek Campus

(03) 5264 1038

Alternatively, safety incident reports can be made using the College's Injury and Incident Notification form in CompliSpace Assurance.

### **Child Safety Risk Management Policy**

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 was 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 Geelong Lutheran College is outlined in our 8 Step Risk Management Process.

The risk evaluation methodology is outlined in Step 5 Evaluate the Risks document.

Risk treatments are implemented using the methodology outlined in Step 6 Treat the Risks.

### **Risk Assessments for Specific College Contexts and Activities**

Senior Management, 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 College's operational profile or when new activities, buildings and facilities are planned and operating.



The following College 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 Head of College or delegate for their consideration:

- **Physical Environment:** Ongoing, periodic reviews must be undertaken of all physical College 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 College 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 Child Safety Codes of Conduct.
- **Excursions and Camps:** The College has developed and implements specific policies and procedures relating to excursions and camps ensuring that child safety risks specific to excursions and overnight stays are identified and controls are put in place. For more information, refer to our Excursions policies.
- **Work Placement:** The College has developed and implements specific policies and procedures relating to work experience placements, including the completion of a Student Work Experience Checklist that outlines key child safeguarding requirements.
- **Sport:** The College has developed and implements specific policies and procedures to manage child safety risks specific to the variety of sporting activities at the College. These risks include the use of Casual Staff and Volunteers, maintaining professional boundaries, appropriate demonstration techniques and supervision both on College grounds and in off-site locations.

#### **CompliSpace Assurance**

The College has implemented CompliSpace Assurance as one strategy to manage the child safety risks in the College's environments. CompliSpace Assurance is an online risk and compliance workflow management tool that integrates with our Child Safety 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.

Unactioned tasks are escalated and reported to allow the College to monitor and record its compliance performance in real-time.

The College 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 College's 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 College has developed a Child Safety Risk Register. This is to ensure that College Board and the senior management have clear visibility and oversight of child safety risks in the College and enable the College to effectively manage our legal and regulatory child safety obligations under Ministerial Order 1359.

The Senior Management and College Board review, at least annually, 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.

### **Communicating our Child Safety Risk Management Strategies**

The Child Safety Risk Management Policy is published on the College's public website.

The College makes it available to all Staff via the College's Intranet (SIMON) site, and provides it to new Staff, to Direct Contact and Regular Volunteers and to Direct Contact and Regular Contractors as part of their induction. Training about the Child Safety Risk Management Policy is also included in annual refresher training for Staff and relevant Volunteers and Contractors. For more information, refer to Child Safety Training.

The Child Safety Risk Management Policy is also communicated to Staff, Volunteers, Contractors, Parents, Students and the wider College community in summary in the Child Safe Policy, which is available on our public website.

It is also available in hard copy by request.

### **Evaluation**

This Policy will be reviewed as part of the College's annual review cycle.

Policy reviewed:	May 2022
College Council Adopted:	June 2022
College Board adopted:	September 2023