Child Safe Program

Child Safety Risk Management

Noosa Christian 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.

The Working with Children (Risk Management and Screening) Regulation 2020 (Qld) sets out eight matters to be included in the College's Child and Youth Risk Management Strategy. These include that the College must have:

- plans for managing the risks associated with high-risk activities and special events
- strategies for providing communication and support for implementing the risk management strategy including written information about the risk management strategy for, and where the strategy may be accessed by:
  - persons employed or otherwise engaged by the College for the risk management strategy; and
  - children, or parents of children, who receive a service or take part in an activity associated with the College.

While child safety risks within the operations of a school can never be completely eliminated, Noosa Christian 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.

Key Definitions

In addition to definitions set out in [Child Safety Program Definitions](https://ce-viewer.com/module/227/page/45f5b3d2-e628-465b-8ac3-8b297c374481.md), the following definitions are of particular importance to this Policy:

Risk

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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 minimise, monitor, and control the probability and/or the impact of 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.

The Education Director

The Board of Directors is responsible for:
- understanding the child safety risks relevant to the College, based on the College's operational profile
- developing, and ensuring the effective implementation of the College's child safety risk management strategies (noting that the Board of Directors has assigned responsibility for implementing the strategies to the Principal)
- 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 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 of 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 legal and regulatory compliance at the College
- ensuring that appropriate guidance and training is provided to the individual members of the Board of Directors, Staff and relevant Volunteers and Contractors, at least annually, about Child Safety issues, including legal reporting obligations (noting that the Board of Directors has assigned responsibility for ensuring that Staff, Volunteers and Contractors receive this guidance and training to the Principal).

The Principal

The Principal 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, the Board of Directors 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 the Board of Directors and updated as set out in **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 issues, including legal reporting obligations.

The Management Team

The Management Team is responsible for:
- reviewing, in consultation with the Principal, 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 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 College's Child Safety risk management strategies to be effectively implemented within the College
- supporting the Principal 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 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:

· Children's ages – Kindergarten (4-years-old) to Year 12 (18 or 19-years old); we support a "Buddy Class" where an older class mentors a younger class.

· Children's genders – both boys and girls

· Children's socio-economic and cultural backgrounds – no significant groups from particular socio-economic or cultural backgrounds (other than Australian); as a whole, there is a significant group of students with disabilities – predominately ASD, ADHD, Social/Emotional Regulation, Anxiety etc.

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· School location – the school is located outside the hinterland town of Cooroy, next to a main highway. The highway is separated from the school by a sound reducing wall. One boundary of the school (north) is bushland. The western edge meets up with farmland. The southern boundary faces the Cooroy Belli Creek Road (a rural, yet relatively busy road) and is poorly fenced.

· Various activities provided by external contractors – incursions hosted by external contractors (i.e. World of Maths, Elevate, School Photo Days, RACQ Docudrama etc. Activities of campus (excursions) hosted by external contractors are also supervised by teachers (i.e. Sports Carnivals, Year Level Camps, Well-being or Reward Days etc)

· How intermingled is the school's staff/volunteer cohort with their church – being a volunteer or member of the church does not automatically allow a person to volunteer at the school, however, church volunteers are often on school grounds to be present at the church (usually outside of school hours, but not always)

· Other school ethos – teachers generally stay with a particular year level (i.e. Year 7) rather than a particular cohort over several years.

Noosa Christian College Risk Management Strategies

Noosa Christian College has implemented the following Child Safety risk mitigation strategies to ensure that the College maintains a proactive approach to our duty of care to protect children from harm and complies with our 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. This Risk Register can be found Child Safe Risk Register.

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- **Child Safety Risk Register Annual Reviews**: The Child Safety Risk Register is reviewed annually by the Board of Directors and at least annually by the Management 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 Program (Policy & Procedures)
  - 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 set of policies and procedures for managing Child Safety Incidents or Concerns Involving College Staff, Volunteers and Contractors to ensure that all risks specific to Staff, Volunteer and Contractor conduct are identified and controls are put in place
  - a Working with Children Checks policy
  - 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 individual members of the Board of Directors, the Management Team, all Staff, and relevant Volunteers and Contractors.
- **Child Safety Advocates:** The College has appointed a number of Child Safety Advocates who are "Child Safety Champions" at the College.
- **Approvals for High Risk Activities and Special Events**: 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 Principal or a relevant management committee for their consideration.
- **Reporting about Child Safety Risk Management**: The Board of Directors and the Management 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 College and the Board of 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.

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

The Management Team and the Board of Directors 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 Principal or a Child Safety Advocate:

- 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 Safety Advocates are here.

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 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 Noosa Christian College is outlined in detail here.

The risk evaluation methodology is outlined here.

Risk treatments are implemented using the methodology outlined here.

Risk Assessments for High-Risk Activities and Special Events

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

The following high-risk activities and special events 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 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 and Social Media – Personal Usage Policy.
- **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. For more information, refer to our Student Work Experience Policy.
- **Sport and Extra Curricular Activities**: The College has developed and implements specific policies and procedures to manage Child Safety risks specific to the variety of sporting and extra-curricular 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. For more information, refer to our Excursions Policy.

A rigorous risk assessment process must occur for all of the above activities before they are approved by the College to go ahead. This includes a documented process of:

- communicating and consulting with relevant stakeholders to understand the scope of the activity or event
- describing the activity or event in detail, including the purpose, objectives, key elements, location, environmental factors and persons involved
- identifying risks of harm or abuse to students
- analysing and classifying the risk in terms of both the likelihood and consequences of the risk event occurring
- evaluating the risks to make decisions about how to treat or control them
- putting the determined risk treatments and controls into action
- managing the risks by monitoring and reviewing the risk treatments and controls on an ongoing basis.

CompliSpace Assurance

The College has implemented CompliSpace Assurance as one strategy to manage Child Safety risks in all College 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. 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 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 the Board of Directors and the Management Team 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.

The Management Team and the Board of Directors 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.

Our Child Safety Risk Register can be found Child Safe Risk Register.

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 PolicyConnect site, and provides it to new Staff and to relevant Volunteers and 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/carers, students and the wider College community in summary in the Child Safe Program (Policy & Procedures), which is available on our public website.

It is also available in hard copy by request.

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