

Guidance to Manage Child Safety Risks in Schools

June 2022

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1 Introduction

This Guidance has been developed for all schools managed and operated by Diocese of Sale Catholic Education Limited (**DOSCEL**).

All schools must assess child safety risks to comply with Child Safe Standards.

1.1 Why schools need child safety risk management

All students are vulnerable to child safety risks. The Child Safe Standards require schools to put in place systems and processes to help prevent harm to students.

A thorough risk analysis is the first thing schools should do to prevent harm to students. Risk analysis provides the foundation for all other child safety work.

All child safety risks have severe consequences. Schools need to assess child safety risk with a focus on preventing and reducing child abuse and harm. It is not possible to eliminate every risk to child safety. Schools should manage and monitor risks and regularly review their risk assessment.

Schools must document their risk management approach and put in place treatments to reduce child safety risks.

1.2 How to comply with Ministerial Order No. 1359

Ministerial Order No. 1359 provides the framework for child safety in schools. It requires all schools to undertake a child safety risk assessment.

To comply with the order, schools must:

- develop and put in place risk management strategies that:
 - focus on preventing, identifying and mitigating risks related to child safety and wellbeing in the school
 - consider the school environment, programs the school delivers and needs of students.
- record of the risks and the actions the school will take to reduce or remove them (risk controls and risk treatments)
- each year, monitor and review child safety and wellbeing risks and assess the effectiveness of risk controls.

1.2.1 School volunteers

Schools must also consider risks related to volunteers and their roles.

If reasonable and appropriate, the school may need to collect information about volunteers such as:

- proof of personal identity
- information about essential or relevant professional or other qualifications
- the person's history of working with children.
- references that address suitability for the job and working with children.

In addition, schools must:

- Provide staff engaged in child related work with annual training to ensure they know how to:
 - identify and mitigate child safety risks
 - protect a student's right to privacy
 - provide access to information
 - support social connections and learning opportunities.
- Provide similar training for volunteers, relevant to their role
- Enable students, families and volunteers to have input into the school's child safety and wellbeing risk strategies.

2 Develop the school's child safety risk register

2.1 Types of Risks

The Royal Commission into Institutional Responses to Child Sexual Abuse identified the following four types of child safety risks:

- Organisational risk
- Propensity risk
- Situational risk, and
- Vulnerability risk.

2.1.1 Organisational risk

Organisational risk describes school attributes that make child abuse more likely to occur. The same attributes also make child abuse less likely to be identified and addressed.

These risks may occur when schools do not focus on prevention or when the school culture allows misconduct to happen. For example, a student disclosure is not believed.

School culture, policy and practice can influence whether harm or abuse will occur, be prevented, detected or stopped. They will also determine how well a school responds to a student disclosure or reports abuse.

Factors to consider include:

- level of student empowerment in the school culture
- internal structures that support students speaking up or reporting abuse
- willingness among decision-makers to put protective factors in place
- whether school community, staff or volunteer behaviour discourages reporting.

Reporting may be discouraged if the school:

- has a strong hierarchical structure
- encourages deference to authority or unquestioning trust of leaders
- has a close-knit community, where people have known each other for years or are related
- includes people with the attitude that children and young people should be seen and not heard
- prioritises its reputation above the safety of students.

Protective factors include:

- appropriate child safe policies are in place and implemented
- the school trains staff and volunteers in child safe policies
- the school communicates child safe policies to the school community
- adequate staffing to put policies and procedures into practice.

Key questions

- How do our school structures, attitudes and practices affect the risk of harm or child abuse?
- Does our school have protective factors in place? What are they?
- Does our school community act to stop students reporting abuse?

2.1.2 Propensity risk

Propensity risk reflects the willingness of an individual to behave in an unacceptable way.

These risks may occur when people with a tendency to abuse children are able to access their victims. These people may:

- have a sexual interest in children
- display anti-social tendencies which allows harm to go undetected
- have engaged in sexual misconduct or abuse before.

To manage propensity risk, schools must operate on the assumption that everyone who works with students can pose some level of risk to them.

Key questions

- Does our school understand the character of adults who engage with students in our school?
- Have staff, volunteers, contractors, and service providers been effectively vetted?
- Does training undertaken by staff and volunteers work to reduce the risk of harm or child abuse?
- How does our school set expectations for adult behaviour?

2.1.3 Situational risk

Situational risks are created when potential perpetrators of child abuse have opportunities to:

- be alone with a student
- form relationships that involve physical contact or emotional closeness

This can lead to grooming and unlawful sexual behaviour.

Factors to consider include:

- the setting and facilities where the activity takes place
- how often and for how long the activity occurs between a student and adult
- whether the activity enables physical contact between students and adults
- whether interactions can result in an emotional dependence on adults
- the degree to which the activity is supervised.

Key questions

- Are there opportunities for adults to be alone with students, unseen by others?
- Are there opportunities for adults to form relationships with students that could lead to child abuse?

- Are there opportunities for physical contact or emotional closeness that could lead to child abuse?
- How does the physical environment of our school mitigate risks to child safety?
- How does the online environment of our school mitigate risks to child safety?

Note: Situational risks in activities like school camps and excursions require their own risk analysis.

2.1.4 Vulnerability risk

Vulnerability risks arise from the characteristics of students in the school. All students are inherently vulnerable to abuse.

Factors that may increase vulnerability include, but are not limited to:

- age
- Aboriginal and Torres Strait Islander or culturally and linguistically diverse backgrounds
- disability
- students who identify as LGBTIQ+
- a history of trauma, abuse, mistreatment or neglect
- students with an incentive to remain silent
- inability to live at home
- international students
- contact with the justice system
- history of drug or alcohol dependence
- poor mental or physical health
- academic achievement

Key questions

- What circumstances or characteristics might make students in our school more vulnerable to harm or abuse?

For further information see:

- [Research identifies four dimensions of risk of child sexual abuse in institutional settings.](#)

2.2 Consider potential harm

It is standard practice to assess causes and consequences when analysing risks. For child safety risks, it is also important to consider all types of potential injury or harm to a child.

Harms related to child safety may occur at school, during school-related activities or at home.

Schools should assess child safety risks arising from the school, or failure by the school to protect a student from known harm outside the school.

Assessing the consequences of harm is complex. The same form of abuse can have very different impacts on children. This makes it difficult to predict how a harm will affect a child. Some consequences may take many years to surface and may have a cumulative impact. For this reason, harms caused by child abuse is always significant or severe for a child and their family. Therefore, all child safety risks have severe consequences.

To help identify and monitor risks, schools can use their risk register template, which:

- separates consequences that may harm the school from those that may harm children
- does not require schools to assess the likelihood and consequence of a risk to identify a risk rating. Instead, schools assess whether their risk controls will mitigate the harms arising from each standard.

If the school uses an alternative risk assessment approach and template based on an assessment of likelihood and consequence, the school should always consider the consequence of child abuse and harm to be severe or catastrophic.

2.3 Identify existing and new controls and treatments

Consider the following when identifying existing, and planning for new controls and treatments.

- Policies – what is the DOSCEL or school policy towards a risk?
- Processes – what are the steps our school takes to deal with a risk? For example, appointing a Child Safety Champion
- Programs – what existing programs can we put in place across our school to address a risk? For example:
 - Whole School Approach to Positive Behaviour
- Physical changes – can our school change our physical environment to reduce risk?
- Online filters – can our school manage the online environment to reduce risk?
- Supervision – can our school improve visibility of high-risk areas (physical or virtual) to reduce the risk?
- Behaviour
 - how does our school observe the behaviour of students, staff, contractors and volunteers?
 - how does our school support students to behave safely?
- Routines – can our school create a sense of predictability to reduce risk?
- Training – can our school upskill staff, contractors and volunteers to reduce risk?
- Communications – can our school promote child safety to reduce risk?

2.4 Child Safety Risk Register template

The Child Safety Risk Register template is aligned with each of the 11 Child Safe Standards and includes:

- pre-populated content for risk titles and descriptions, risk causes and risk consequences – schools do not need to change these columns
- sample content for risk controls – schools need to change this content to ensure it is accurate for their local circumstances
- a column for the school to record whether existing controls are sufficient (controls assessment)
- additional columns for risk treatments (future action that will be taken by the responsible person) and dates for completion – schools need to complete these columns where required following the controls assessment

This template is **optional**. Schools can use other risk templates to identify and monitor child safety risks.

Schools must tailor example content to be relevant to the school.

Not tailoring the sample content may result in non-compliance with [Child Safe Standard 2](#) and Ministerial Order No.1359.

2.4.1 Instructions for completing the template

1. Save a copy of the template.
2. Consider the identified child safety risks for each standard, along with the causes and consequences relating to the risk.
3. Review the sample content in the 'existing controls' column and change to ensure it is accurate for the school's local circumstances. These risk controls will refer to some of the child safety and wellbeing policies and procedures so schools will need to refer to these policies when assessing the adequacy of the controls.
4. Assess whether the schools existing controls, when taken together, are sufficient to manage the identified risk, taking into account the identified risk causes and consequences.
 - If all existing controls are currently in place and they are considered sufficient to address this risk, select '**Yes**'.
 - If any existing controls are not in place or are not considered sufficient to manage the risk in the school, select '**No**' and outline the actions that will be taken to address this in the treatment column. Schools may also need to change the existing controls column
5. Add the position title of the person responsible for implementing the new treatments.

6. Add a date for when the new treatments should be in place.
7. Once the register is finalised, record the date at the top of the register and add a date for when the risk register will be reviewed. Risks should be monitored, reviewed and reported on every year. Risks may need to be reviewed more often if there is a child safety incident.
8. Make sure the principal approves the Child Safety Risk Register. Provide copies to relevant staff and ensure the register is available to members of the school community on request.

3 Resources and References

- [Commission for Children and Young People: Creating a Child Safe Organisation](#)
- [Protecting Children - Mandatory Reporting and other obligations e-learning module](#)
- [Victorian Registration and Qualification Authority: Child Safe Standards](#)