



# Child Safety Risk Management Policy and Procedures

## 1. Aim

- 1.1 At Tombolo Academy we are committed to ensuring the safety, wellbeing and participation of all students under our care. We have zero tolerance for child abuse. Tombolo Academy manages a broad range of risks associated with our activities and operations, including risks relating to child safety. 'Risk' basically means the possibility of something bad happening and 'risk management' refers to the general process of assessing risks and applying resources to mitigate, monitor, and control their probability and impact.
- 1.2 While child safety risks within our operations can never be completely eliminated, Tombolo Academy places the utmost importance on providing an environment where children and young people are safe and feel safe.
- 1.3 We do this by taking a proactive approach to the development and implementation of effective risk management strategies and practices which focus on preventing, identifying, and mitigating risks related to the safety and wellbeing of our students and which takes into account their characteristics and needs, their activities and the nature of our school environment.
- 1.4 Our Child Safety Risk Management Policy and Procedures has been endorsed by the School Board.
- 1.5 If you are a non-English speaker who needs help to understand this Policy and Procedures, please contact [admin@tombolo.vic.edu.au](mailto:admin@tombolo.vic.edu.au).

## 2. Scope

- 2.1 The application of this policy is relevant to the School Board, the Principal, to School staff and parents.

### 3. Definitions

In this Policy and Procedures, whenever we refer to:

- 3.1. **'child abuse'** - this includes any act committed against a child involving a sexual offence, grooming offence (grooming is when a person engages in predatory conduct to prepare a child for sexual activity at a later time and can include communicating or attempting to befriend or establish a relationship or other emotional connection with the child or their parent or carer), the infliction of physical violence or serious emotional or psychological harm on a child, or the serious neglect of a child (including exposure to family violence and its effects).
- 3.2. **'child connected work'** – this means work authorised by the school governing authority and performed by an adult in a school environment while children are present or reasonably expected to be present.
- 3.3. **'child-related work'** – this means under the Worker Screening Act 2020 (Vic):
  - a) work at or for a service, body or place, or that involves a specified activity; and
  - b) that usually involves direct contact with a child. Educational institutions are specified for the purpose of (a).Work is not considered child-related work where it involves only occasional direct contact with children that is incidental to the work.
- 3.4. **'child safety'** –this refers to matters related to a child's safety and wellbeing, including the protection of children from all forms of child abuse, managing the risk of child abuse, providing support to a child at risk of child abuse, and responding to suspicions, incidents, disclosures or allegations of child abuse.
- 3.5. **'child safety complaint'** – this means any disclosure, allegation, suspicion, concern or report regarding:
  - a) a breach of our Child Safety Code of Conduct
  - b) our response to or management of a child safety incident or concern
  - c) a child safety incident or concern that is alleged to have occurred, is occurring or is at risk of occurring at or within our school environment
  - d) a child safety incident or concern involving Tombolo staff, Volunteers, Third Party Contractors or an External Education Provider or any misconduct related to our Child Safety Program.
- 3.6. **'External Education Provider'** - this means any organisation that the school has arranged to deliver a specified course of study that is part of the curriculum to a student or students enrolled at the school, whether on school premises or elsewhere.
- 3.7. **'school staff', 'staff' or 'staff member/s'** - this means any individual working in a school environment who is directly engaged or employed by a school governing authority (school proprietor, governing body or principal); a

contracted service provider (whether or not a body corporate or any other person is an intermediary) engaged by a school governing authority to perform child-related work; or a minister of religion, religious leader or employee or officer of a religious body associated with the school.

- 3.8. **'school environment'** – this means all physical, online or virtual places made available or authorised by the school for use by a student during or outside hours, including (but not limited to) a campus of the school, online or virtual school environments and any other locations provided by the school or through a third party provider for a student to use, such as locations used for camps, delivery of education and training, sporting events, excursions, competitions or other events.
- 3.9. **'Third Party Contractor'** – this means a service provider contracted by the school to provide services that are performed by individuals (contractors).
- 3.10. **'Volunteer'** - this means a person who performs work without remuneration or reward for the school in the school environment.

## 4. Risk Management Processes

- 4.1 Tombolo Academy implements child safety risk management processes based on:
- a) the nature of our school environment (physical, online and off-campus)
  - b) our operational profile
  - c) the activities our students undertake (including the provision of services by contractors or outside our physical environment)
  - d) the characteristics and needs of our students, including students with disability, Aboriginal and Torres Strait Islander students, students from culturally and linguistically diverse backgrounds, students who identify as lesbian, gay, bisexual, trans or gender diverse, queer/querying, intersex and asexual (LGBTQIA+) students and taking into account the age and gender mix of our student cohort.

## 5. Risk Management Strategies

We use the following risk management strategies to identify and mitigate our child safety and wellbeing risks:

### 5.1 Risk management program

We have a comprehensive risk management program that was drafted in accordance with International Standards, *ISO 31000, Risk Management – Guidelines*, which provides principles, a framework and a process for managing risk, including child safety and wellbeing risks, for all organisations irrespective of their size, activity or industry sector.

### 5.2 Risk assessments

Tombolo Academy conducts risk assessments of our school environment, activities and characteristics at least annually, taking into account the needs of

our students and applicable control measures (such as systems, policies and procedures). This ensures we identify all child safety and wellbeing risks and there are no gaps in our child safety and wellbeing strategies and systems that an individual motivated to commit child abuse or harm could exploit.

### **5.3 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, Tombolo Academy has developed and implemented a Child Safety Risk Register to actively monitor child safety and wellbeing risks and their mitigation.

The Child Safety Risk Register ensures that our Board and Leadership Team have clear visibility and oversight of child safety risks at Tombolo Academy to enable us to effectively manage our legal and regulatory child safety and wellbeing obligations.

Our Child Safety Risk Register is reviewed annually by the Board and at least annually by the Leadership Team, as well as following any child safety concerns, complaints or incidents.

This includes reviewing the assessed child safety risks in the Child Register and the effectiveness of risk controls for each risk. Where new child safeguarding 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.

## **6. Child Safety Program**

6.1 Tombolo Academy has a Child Safety Program, which includes a comprehensive suite of child safety and wellbeing policies and procedures, including (but not limited to):

- a) our Child Safety Code of Conduct and Child Safety and Wellbeing Policy, in particular, following and applying Ministerial Order 1359, which sets out how the Victorian Child Safe Standards apply in school environments
- b) policies, procedures and guidance on identifying risks of child abuse and other harm in our school environment, legal obligations, responsibilities for managing these risks and how to respond to child safety complaints as set out in our Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures
- c) a Working with Children Checks Policy and Procedures and Child Safety Recruitment Practices to assess the suitability of people to work with children and discourage inappropriate people from working within our school.

## **7. Child Safety Training and Information**

- 7.1 We provide child safety training at induction and annual refresher child safety training for all staff and others as appropriate (e.g. Board of Directors members, Volunteers and contractors engaged in child-connected work) as set out in our Child Safety Training and Supervision Policy and Procedures.

## 8. Child Safety Officers

- 8.1 To champion child safety, Tombolo Academy has designated Child Safety Officers who are the first point of contact to provide advice and support to students, parents and carers, staff, contractors and Volunteers regarding the safety and wellbeing of Tombolo Academy students and to take action when any child safety complaints are made, including providing support to affected members of our school community.

## 9. Approvals for specific contexts and activities

- 9.1 Tombolo Academy has approval and ongoing risk management processes for certain contexts and activities (set out in Procedures below), requiring a specific risk assessment be undertaken and provided to the Principal or Leadership Team for consideration.

## 10. Reporting

- 10.1 The Board and Leadership Team receive regular reports regarding child safety risk management and any instances of non-compliance with our policies, procedures and with legal and regulatory requirements. Information is also provided of any concerns or incidents that may suggest a breakdown in our child safety systems, procedures and risk controls.

## 11. Continuous improvement

- 11.1 Tombolo Academy and our Board are committed to a continuous improvement process which involves regular review of our Child Safety Program and child safety risks to identify areas for improvement.

## 12. Risk Management Responsibilities

- 12.1 The following persons have responsibility for child safety risk management at Tombolo Academy:

<b>Role</b>	<b>Responsibility</b>
Board of Directors	The Board is responsible for: <ul style="list-style-type: none"><li>understanding the child safety risks relevant to Tombolo Academy based on our operational profile</li></ul>

	<ul style="list-style-type: none"> <li>• developing, and ensuring the effective implementation of, our child safety risk management strategies (noting that the Board has assigned responsibility for implementing the strategies to the Principal</li> <li>• reviewing and approving any changes to our child safety risk management strategies</li> <li>• promoting a child safe risk management culture within Tombolo Academy</li> <li>• establishing clear lines of responsibility and delegations with regard to child safety risk management</li> <li>• ensuring we communicate our commitment to child safety and legal and regulatory compliance and ensuring that Tombolo Academy’s operations are consistent with this commitment</li> <li>• ensuring that Tombolo Academy identifies and takes steps to mitigate child safety risks, including by: <ul style="list-style-type: none"> <li>○ ensuring that we have a Child Safety Risk Register in which child safety risks and risk controls are recorded</li> <li>○ receiving regular reports about child safety risk management and our Child Safety Risk Register</li> <li>○ monitoring and evaluating the effectiveness of our child safety risk controls</li> <li>○ reviewing new and emerging child safety risks and proposed controls for these risks</li> <li>○ receiving regular reports regarding child safety legal and regulatory compliance</li> </ul> </li> <li>• ensuring that appropriate guidance, training and information is provided on induction and at least annually to individual Directors of the Board about: <ul style="list-style-type: none"> <li>○ their individual and collective obligations and responsibilities for managing the risk of child abuse at Tombolo Academy</li> <li>○ child safety risks in the school environment</li> <li>○ our child safety policies, procedures and practices</li> </ul> </li> <li>• ensuring that appropriate guidance, training and information is provided on induction and at least annually to staff and others engaged in child-connected work such as Volunteers and contractors about child safety, including guidance on how to identify and mitigate child safety and risks in our school environment (noting that the Board has assigned responsibility to the Principal for ensuring that this guidance, training and information is received).</li> </ul>
Principal	<p>The Principal is responsible for the effective day-to-day management of risk and for:</p> <ul style="list-style-type: none"> <li>• effectively implementing Tombolo Academy’s child safety risk management strategies, including deploying all available resources for that purpose</li> <li>• communicating openly and honestly with, and providing advice to the Board in relation to: <ul style="list-style-type: none"> <li>○ child safety risk management at Tombolo Academy</li> <li>○ any instances of non-compliance with child safety legal and regulatory requirements</li> <li>○ any breakdown in child safety risk controls, systems or processes</li> <li>○ identifying child safety risks (including new and emerging risks) relevant to Tombolo Academy and our school environment and the steps taken (or that should be taken) to mitigate these risks</li> <li>○ the resources required for Tombolo Academy to meet its legal and regulatory compliance requirements, effectively manage child safety risks and be a child safe organisation</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• promoting a child safe risk management culture within the school</li> <li>• ensuring that the Child Safety Risk Register is maintained, regularly reviewed, reported to the Board and updated as set out in <b>Procedures</b> below</li> <li>• monitoring and evaluating the effectiveness of Tombolo Academy’s child safety risk controls</li> <li>• ensuring that Tombolo Academy’s current programs and activities and any new programs and activities are assessed so that any associated child safety risks are effectively managed and communicated to staff and others (e.g. Volunteers and contractors engaged in child-connected work) as appropriate</li> <li>• ensuring that appropriate guidance, training and information is provided to all staff, and others as appropriate, at least annually, about a number of matters, including guidance on how to identify and mitigate child safety risks in our school environment.</li> </ul>
Leadership Team	<p>The Leadership Team (including the Principal) is responsible for:</p> <ul style="list-style-type: none"> <li>• reviewing, in consultation with the Child Safety Officers, Tombolo Academy’s child safety risk management strategies, the Child Safety Risk register and Child Safety Program in accordance with our child safety policies and procedures</li> <li>• identifying and reporting to the Board any instances of non-compliance with child safety legal and regulatory requirements and any breakdowns in child safety risk controls</li> <li>• ensuring that appropriate resources are made available in their area of operations to allow Tombolo Academy’s child safety risk management strategies to be effectively implemented within the school environment</li> <li>• supporting staff and other people as appropriate in the practical application of Tombolo Academy’s child safety risk management strategies, policies, procedures and work systems</li> <li>• promoting a child safe risk management culture within Tombolo Academy.</li> </ul>
Child Safety Officers	<p>The Child Safety Officers are responsible for:</p> <ul style="list-style-type: none"> <li>• promoting a child safe risk management culture within Tombolo Academy</li> <li>• ensuring that the Child Safety Risk Register is maintained, regularly reviewed, reported to the Board and updated as set out in <b>Procedures</b> below</li> <li>• ensuring that Tombolo Academy communicates its commitment to child safety and legal and regulatory compliance and ensuring that operations are consistent with our commitment to child safety</li> <li>• receiving and reviewing child safety risk reports</li> <li>• supporting, advising and assisting the Principal and the Executive Team in relation to effective child safety risk management.</li> </ul>

## 13. Risk Management Appetite

13.1 We regard any non-compliance with legal and regulatory requirements related to child safety and wellbeing as unacceptable and requiring immediate rectification.

Tombolo Academy has no appetite for:

- a) implementing any new programs or initiatives that may increase our child safety risks or result in a breakdown of our existing child safety risk controls and their effectiveness.



## 14. Reporting Child Safety Risks

- 14.1 All staff and adults engaged in child-connected work (e.g. Volunteers and contractors) are required to be aware of Tombolo Academy's child safety risk management practices and must report to the Principal or another Child Safety Officer:
- a) any incidents, issues or concerns that may indicate a breakdown in our child safety risk controls
  - b) any new or perceived child safety risks.

## 15. Risk assessments for specific school contexts and activities

- 15.1 The Leadership Team (and any staff members who have been delegated the required level of responsibility) must ensure that child safety risks are considered and reviewed when there are changes to our operational profile or when new activities, buildings and facilities are planned and operating.
- 15.2 As part of Tombolo Academy's approvals and ongoing risk management processes, the following contexts and activities require specific risk assessments to be undertaken and provided to the Principal (or their delegate) for consideration:
- a) **Physical environment:** Ongoing, periodic reviews must be undertaken of all physical learning 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.
  - b) **Online environment:** Regular monitoring, and ongoing periodic reviews must be undertaken of Tombolo Academy's online environment and electronic communications, to identify and eliminate online child safety risks such as access controls, inappropriate sharing of information, data security and integrity issues, online grooming and breaches of our **Child Safety Code of Conduct**.

## 16. Breach

- 16.1 Staff, including the Leadership Team and Principal, Volunteers and Third Party Contractors who breach this Policy and Procedures may be subject to disciplinary actions that may result in a range of measures including (depending on the severity of the breach):
- a) remedial education
  - b) counselling
  - c) increased supervision
  - d) the restriction of duties
  - e) appointment to an alternate role suspension



f) in the case of serious breaches, termination of employment, contract or engagement.

16.2 Where any other member of the school community breaches any obligation, duty or responsibility within this Policy and Procedures, Tombolo Academy will take appropriate action.

## 17. Review

17.1 Tombolo Academy is committed to the continuous improvement of our Child Safety Program. We have established processes for the review and ongoing improvement of our child safe policies, procedures, and practices for overall effectiveness and to ensure compliance with all child safety related laws, regulations and standards.

17.2 As part of our risk management strategies and processes, Tombolo Academy reviews this Risk Management Policy and Procedures after any significant child safety incident and annually in order to monitor and review the risks related to child safety and wellbeing and evaluate the effectiveness of the implementation of our risk controls.

17.3 We seek feedback from families and our School community in the development and review our child safety and wellbeing policies and procedures. We record and analyse all complaints, concerns, and safety incidents to identify causes and systemic failures and inform continuous improvement. We report on the outcomes of relevant reviews to staff, Volunteers, the school community, and families and students.

## 18. Policy Administration

<b>Created date</b>	June 2023
<b>Policy Owner</b>	The Principal
<b>Consultation</b>	School Staff School Board
<b>Legislation</b>	Education and Training Reform Act 2006 (Vic) Victorian Child Safe Standards as implemented by Ministerial Order 1359 Worker Screening Act 2020 (Vic)
<b>Endorsed by</b>	School Board
<b>Endorsed on</b>	June 2023
<b>Last review</b>	June 2023
<b>Next review</b>	June 2025