



Child Safe Risk Management Procedure

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Table of Contents

1 Purpose.....	3
2 Scope	3
3 Terms and Definitions.....	3
4 Child Safe Risk Management	4
5 Child Safe Situational Prevention Approach.....	4
6 The Risk Assessment Process	5
6.1 Establishing the Context	5
6.2 The Risk Assessment Process	5
6.2.1 Stage 1 – Identifying Risks.....	5
6.2.2 Stage 2 – Assessing Risks.....	7
6.2.3 Stage 3 – Controlling Risks	9
6.2.4 Stage 4 – Documentation.....	9
6.2.5 Stage 5 – Monitoring and Reviewing.....	10
7 Related Policies and Procedures	10
8 Relevant Legislation	10
Appendix A - Child Safe Situational Prevention Strategies	11
Appendix B - Dimensions of Risk	12
Appendix C – Safeguarding Risk Assessment Template.....	13
Appendix D – Child Safe Checklist: Overnight Stays	14

1 Purpose

AEPL recognises the importance of identifying, assessing, and managing risks of child abuse and harm in both physical and online environments. The *Child Safe Risk Management Procedure* (this Procedure) is a demonstration of AEPL's commitment to identifying and mitigating child safety risks across the organisation. This Procedure aims to:

- Reduce the likelihood of children being harmed when engaging in activities and programs delivered by AEPL
- Provide a structured, proactive and preventative approach to mitigating potential risks of abuse to children and vulnerable adults
- Make it difficult for perpetrators to offend at AEPL due to the fear of being caught
- Provide Officers, Study Centre Managers, Leaders and Helpers with the appropriate tools and guidance to identify and address risks to children.

2 Scope

This Procedure applies to Officers, Study Centre Managers, Leaders, Helpers, contractors, and sub-contractors engaged by AEPL to deliver services to children.

This Procedure extends to all aspects of educational activities and programs of AEPL, including those delivered in the physical and online environments.

3 Terms and Definitions

For the purposes of this Procedure:

Table 1: Terms and Definitions

Term	Meaning
AEPL	Association for Educational Projects Limited.
Centre	Refers to a study centre established by AEPL in which its educational activities are conducted.
Child	A person under the age of 18 years, unless under the law applicable to the child, majority is attained earlier.
Child Abuse	Refers to the acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. The forms of child abuse are sexual abuse, emotional abuse, neglect, physical abuse, and exposure to family violence.
Child Safe Organisation	Refers to an organisation that consciously and systematically creates conditions that reduce the likelihood of harm to children. It creates conditions that increase the likelihood of identifying and reporting harm and responds appropriately to disclosures, allegations, or suspicions of harm.
Child Safety Officer (CSO)	Refers to the individual appointed by AEPL who is responsible for matters relating to child safety, including the management of child safety complaints.

Helper	A person less than 18 years old invited to help from time to time in a particular activity.
Leader	An adult who has an ongoing role in the provision of services in a Centre.
Officer	Has the same meaning given by the <i>Corporations Act 2001</i> (Cth) and includes a director or secretary of AEPL.
Staff	Refers to an individual at AEPL in a paid position. This may include Study Centre Managers.
Study Centre Manager	A person appointed by AEPL to direct activities at a Centre.
Volunteer	Refers to an unpaid employee of AEPL. This includes Officers, Leaders and Helpers, and may include Study Centre Managers. It also includes other individuals engaged by AEPL on a voluntary basis.
Vulnerable Adult	Refers to an individual aged 18 years and above who is, or may be, unable to take care of themselves, or is unable to protect themselves against harm or exploitation by reason of age, illness, cultural background, literacy levels, trauma or disability, or any other reason. ¹

4 Child Safe Risk Management

Risk management is critical to ensuring children's safety. In a child safe context, risk management focuses on identifying, preventing and reducing risks to children in both physical and online environments.

AEPL also recognises the importance of identifying and addressing risks of harm when engaging with vulnerable adults. AEPL considers the potential risks to vulnerable adults when conducting risk assessments for relevant programs and activities.

5 Child Safe Situational Prevention Approach

AEPL adopts a Child Safe Situational Prevention Approach which aims to reduce the likelihood of inappropriate behaviour being carried out. This is achieved by implementing systematic and permanent changes that:

- Increase the effort for inappropriate behaviour to be carried out
- Increase the risk of perpetrators being caught
- Make it harder for perpetrators to excuse or dismiss inappropriate behaviour.

In a child safe setting, this is achieved by identifying and changing the environmental factors that assist or prevent the abuse of a child occurring.

Refer to **Appendix A** for guidance on Child Safe Situational Prevention Strategies.

¹ Australian Charities and Not-for-profits Commission, *Governance Toolkit: Safeguarding Vulnerable People*, <https://www.acnc.gov.au/tools/topic-guides/vulnerable-people>.

6 The Risk Assessment Process

6.1 Establishing the Context

Prior to undertaking the risk assessment process, it is important to consider the context of AEPL's operations. This requires an analysis of all child-related environments, as well as the types of child-related activities and programs provided by AEPL. Settings which involve adults working or interacting with children (and/or vulnerable adults) at AEPL include, but are not limited to, the following:

- Study Centre activities, including youth club, after school programs, study sessions, seminars, peer mentoring
- Excursions (day excursions and overnight stays)
- Community Volunteer Projects, including volunteer work with vulnerable adults
- Overnight camps
- Social Outreach Projects.

6.2 The Risk Assessment Process

6.2.1 Stage 1 – Identifying Risks

It is important to be aware of the different kinds of risk factors that may increase the likelihood of harm and abuse to children. There are four dimensions of risk:

1. **Organisational risks** including culture, policy, and practice. These factors can determine attitudes to child safety, and how child safety risks are identified and responded to.
2. **Vulnerability** of children can influence the likelihood of them experiencing abuse.
3. **Situational risks** can provide opportunities for offenders to form relationships with children that may cross professional boundaries.
4. **Propensity risk** refers to the staffing profile within an organisation, and how it may influence the prevalence and type of abuse that may occur.

Please refer to **Appendix B** for further guidance on the dimensions of risk.

Identifying Child Abuse Risks in Physical Environments

All staff and volunteers are responsible for ensuring risks are identified and reported. Table 2 overleaf provides examples of child safety risks that children may be exposed to.

Table 2: Forms of Abuse and Potential Risks

Form of Abuse	Risks to Children
Physical abuse	<ul style="list-style-type: none"> • Physical punishments • Children displaying violent behaviour towards each other • Adults displaying violent/physical behaviours to 'toughen up' children • Peer-to-peer violence
Neglect	<ul style="list-style-type: none"> • Poor supervision • Making a child participate in activities while injured • Lack of adequate drink or food breaks during activities • Children become lost or go missing • Children are left alone for periods of time
Emotional or Psychological abuse	<ul style="list-style-type: none"> • Persistent undermining of a child's confidence • Using offensive, aggressive, or abusive language with children • Isolating or excluding a child from others • Excessive or unreasonable demands of children • Bullying, shaming and name calling • Intimidation and controlling behaviour • Cyberbullying
Sexual abuse	<ul style="list-style-type: none"> • Sexual touching of a child • Grooming behaviour and crossing professional boundaries e.g. giving gifts to a particular child or communicating with a child through personal social media accounts • Production, distribution, or possession of child abuse material • Inappropriate conversations of a sexual nature

Risk factors in the physical environment which can increase the likelihood of abuse include:

- Concealed or hidden areas such as storage rooms
- Rooms with doors that do not have glass panels
- One-on-one situations between an adult and a child, such as a child travelling alone in a car with an adult.

Identifying Child Abuse Risks in Online Environments

The online environment increases opportunities for children to learn, interact, and communicate with minimal supervision. It is the duty of staff and volunteers to ensure that where children participate online, they are protected from the following online risks:

1. **Cyberbullying:** When technology is used to send hurtful messages or images to a child.
2. **Online Grooming:** When an adult uses electronic communications to establish a personal connection with a child, in order to prepare the child for sexual abuse.
3. **Non-consensual sharing of images:** Uploading and sharing images of a child without their consent.
4. **Exposure to inappropriate content:** A child's exposure to pornographic, violent, offensive, or hateful material.

Risk factors in the online environment which may increase the likelihood of abuse include:

- Adults connecting with children through private social media accounts (risk of online grooming)
- Using images or names of children on an organisation’s social media page or website
- Uploading and sharing images of a child without consent
- Poorly managed record keeping systems of child’s personal information.

6.2.2 Stage 2 – Assessing Risks

When a potential risk is identified, staff and volunteers are responsible for:

1. Considering the **likelihood** of risk occurring
2. Considering the **consequence** of each risk
3. **Calculating** and assigning the appropriate risk level.

Calculating the Likelihood: *Table 3* is used to calculate the *likelihood* of the risk of occurring.

Table 3: Likelihood Table

LIKELIHOOD TABLE		
Level	Likelihood	Probability
5	Almost Certain	Almost certain to occur in most circumstances
4	Likely	Likely to occur frequently
3	Possible	Possible and likely to occur at some time
2	Unlikely	Unlikely to occur but could happen
1	Rare	May occur but only in rare and exceptional circumstances

Assessing the Consequence: When determining the consequence level, AEPL considers the level of detriment the harm would cause to the child. In a child safe context, the consequence should be considered as the *potential* for abuse to occur, not necessarily the *level* of the abuse itself.

Table 4 overleaf is used to categorise the level of possible **consequences** that may occur due to exposure to the risk.

Table 4: Consequence Table

CONSEQUENCE TABLE		
Level	Consequence	Description
1	Insignificant	<ul style="list-style-type: none"> Minor injury, altercation or mishap No risk to a child's safety or wellbeing No first aid or support for stress/trauma required.
2	Minor	<ul style="list-style-type: none"> Risk to child caused by environmental factors Minor behavioural issues Minor first aid for stress/trauma event required.
3	Moderate	<ul style="list-style-type: none"> Child is at risk of experiencing any form of child abuse Serious injuries and/or illness requiring medical attention Behaviour that causes the child significant distress such as bullying Child requires professional support.
4	Major	<ul style="list-style-type: none"> Child has experienced any form of child abuse Child missing from main group Serious injuries requiring hospitalisation Stress/trauma requiring ongoing clinical support.
5	Catastrophic	<ul style="list-style-type: none"> Fatality and/or severe irreversible disability to one or more children.

Calculating the Risk Tolerance Level: Once the likelihood of the risk is determined, and the appropriate category of consequences is established, you can use a risk matrix tool to determine a risk score. A risk rating is defined as **Extreme, High, Medium, or Low** based on the combination of likelihood and potential consequence rating.

Table 5: Risk Matrix Tool

Results		PROBABILITY				
		Rare	Unlikely	Possible	Likely	Almost Certain
Severity	Catastrophic	M	H	E	E	E
	Major	M	M	H	E	E
	Moderate	L	M	H	H	E
	Minor	L	L	M	H	H
	Insignificant	L	L	L	M	H

L = Low
M = Medium
H = High
E = Extreme

The risk score determined using the Risk Matrix Tool can provide an indication of the priority level of the risk, indicating the urgency for AEPL to take remedial action. *Table 6* can assist in making this determination.

Table 6: Risk Tolerance Level

Risk Rating	Risk Treatment
Extreme	<ul style="list-style-type: none"> • Activities must be suspended immediately until risks can be eliminated, controlled, or reduced to a lower level. • Report to the CSO and relevant Study Centre Manager and seek advice.
High	<ul style="list-style-type: none"> • Risks are considered significant. • Ensure all controls identified are in place and review processes regularly • Contact the CSO and relevant Study Centre Manager and seek advice
Medium	<ul style="list-style-type: none"> • Risks are considered acceptable, but require attention • Ensure all controls identified are in place and schedule regular review.
Low	<ul style="list-style-type: none"> • No significant risks exist. • Ensure controls are in place and monitor progress.

6.2.3 Stage 3 – Controlling Risks

Risk control involves the development and implementation of measures designed to reduce the level of risk to one that is as low as reasonably achievable. All staff and volunteers should identify and consider relevant prevention strategies, procedures, and processes that can be put into practice.

After a risk control measure is implemented, it is important to evaluate whether the measure has been effective in reducing the risk level.

6.2.4 Stage 4 – Documentation

All risk assessments for child safety risks must be documented using the appropriate templates and checklists.

Safeguarding Risk Assessment Template

The Safeguarding Risk Assessment Template (**Appendix C**) must be completed by each Study Centre Manager prior to the commencement of each new AEPL activity or program. The Study Centre Manager must identify risks to children and vulnerable adults (for relevant activities) and outline appropriate risk management strategies.

Child Safe Checklist: Overnight Stays

The Overnight Stays Checklist (**Appendix D**) provides guidance on planning and preparing for activities which involve overnight stays. This Checklist must be completed by the Study Centre Manager, in addition to the Child Safe Risk Assessment.

6.2.5 Stage 5 – Monitoring and Reviewing

AEPL conducts continuous monitoring and review of this Procedure to ensure that emerging child safety risks are identified, and risk control strategies continue to be relevant and effective.

Annual Review

This Procedure is reviewed on an annual basis, or earlier in accordance with changes to the operating environment, including legislative or regulatory updates. AEPL seeks feedback from staff, volunteers, parents/guardians, and children on key gaps or weaknesses in AEPL's child safe risk management approach.

Review of Child Safe Risk Assessments

Study Centre Managers are responsible for conducting regular reviews and updates to the Child Safe Risk Assessments (with support from the CSO and the Safeguarding Committee), including:

- Every 6 months (minimum)
- After any 'critical incidents'
- When new programs commence, or existing circumstances change such as venues, locations, or environments.

7 Related Policies and Procedures

- *Child Safe Policy*
- *Child Safe Code of Conduct*
- *Child Safe Complaints Handling Procedure*
- *Child Safe Recruitment Procedure*

8 Relevant Legislation

- *Child and Youth Safe Organisations Act 2023 (Tas)*
- *Child Protection Act 1999 (Qld)*
- *Child Protection (Working with Children) Act 2012 (NSW)*
- *Child Wellbeing and Safety Act 2005 (Vic)*
- *Children and Young Persons (Care and Protection) Act 1998 (NSW)*
- *Children's Guardian Act 2019 (NSW)*
- *Civil Liability Act 2002 (NSW)*
- *Crimes Act 1900 (NSW)*
- *Crimes Act 1958 (Vic)*
- *Criminal Code Act 1899 (QLD)*
- *Privacy Act 1988 (Cth)*
- *Worker Screening Act 2020 (Vic)*

Appendix A - Child Safe Situational Prevention Strategies

Table 7: Child Safe Situational Prevention Strategies²

Child Safe Situational Prevention Strategies		
Increase the Effort	Increase the Risk	Remove Excuses
<p>Deflect Offenders</p> <ul style="list-style-type: none"> • Publish on AEPL’s website: <ul style="list-style-type: none"> ○ Commitment to child safety ○ Child Safe Policy and related Procedures • Ensure job advertisements: <ul style="list-style-type: none"> ○ Promote AEPL’s commitment to child safety ○ Include a requirement for WWCC or equivalent. 	<p>Extend Guardianship</p> <ul style="list-style-type: none"> • Encourage and support the inclusion of parents and children in programs and in decision making • Implement measures to encourage children to speak up if they do not feel safe • Teach children protective behaviours skills • Create a child-centred culture within AEPL. 	<p>Set Rules</p> <ul style="list-style-type: none"> • Implement Child Safe Policy and related Procedures • Implement Code of Conduct for staff, volunteers, children, and parents/guardians • Ensure role descriptions clearly outline duties • Regular feedback opportunities are open to stakeholders, including children.
<p>Screen Applicants</p> <ul style="list-style-type: none"> • Verify WWCC (or equivalent in your jurisdiction) for all AEPL staff and volunteers • Thorough reference checks to confirm any inappropriate behaviour with children • Robust interview process on applicant’s child safety values. 	<p>Assist Natural Surveillance</p> <ul style="list-style-type: none"> • Design open plan spaces where children interact with adults to allow for line-of-sight supervision • Ask children to identify areas where they do not feel safe • Windows are not obscured with posters or frosted glass • Ensure children are not unsupervised in isolated areas. 	<p>Display Instructions</p> <ul style="list-style-type: none"> • Make child safe policies, procedures accessible and discuss them regularly at meetings • Develop age-appropriate posters to inform children how to stay safe • Develop and display posters: <ul style="list-style-type: none"> ○ Commitment to child safety ○ How to make a complaint.
<p>Modify Physical Environment</p> <ul style="list-style-type: none"> • Prevent access to concealed / secluded areas • Implement rules to make the concealed areas ‘out of bounds’ • Use clear glass in doors and windows • Install CCTV in high-risk environments. 	<p>Reduce Anonymity</p> <ul style="list-style-type: none"> • Ensure all staff and volunteers are easily identifiable to parents e.g. through name badges • Provide feedback mechanisms on all areas of AEPL, including the environment, staff and volunteers, and the culture of the organisation. 	<p>Governance and Leadership</p> <ul style="list-style-type: none"> • Disciplinary policies outline consequences for breaching the Child Safe Code of Conduct • Ongoing support about Child Safe Best Practices • Implement performance reviews identifying and responding to concerning behaviour • Support for individuals who make complaints.

² The table of *Child Safe Situational Prevention Strategies* has been developed with guidance NSW OCG’s *Risk Management and the Child Safe Standards Part 2: Identifying Risk* handbook.

Appendix B - Dimensions of Risk

Table 8: Dimensions of Risk and Risk Factors

Dimension of Risk	Examples of Factors
1. Organisational Risks	<ul style="list-style-type: none"> • Leaders that do not support or prioritise child safety • Lack of understanding or awareness of child abuse • Protection of reputation of the organisation • Unclear expectations about staff/volunteer and child relationships • Culture of not listening to or respecting children • Children not having access to a trusted adult • Ineffective child safe policies and procedures • Close-knit and longstanding relationships between co-workers • Lack of clear and transparent reporting methods.
2. Vulnerabilities of children	<ul style="list-style-type: none"> • Age of children • Children with physical or intellectual disability • Children with prior maltreatment • Children in challenging home environments • Children from diverse cultural backgrounds.
3. Physical and online environments	<ul style="list-style-type: none"> • Opportunities to be alone with children • Opportunities to form relationships that could involve physical contact and/or emotional closeness • Opportunities to connect with children online on social media or other apps.
4. Propensity of adults to abuse	<ul style="list-style-type: none"> • Staffing profile and staff gender ratios • The context and nature of the organisation's work.

Appendix C – Safeguarding Risk Assessment Template

The Template below is an **example only** and should be updated in accordance with the relevant AEPL activity, event or program. A new Template should be completed for each different activity or event which involves adults interacting with children and/or vulnerable adults. The **red text** is example text only and should be removed when completing the template.

Date reviewed	[insert date]
Next review due	[insert review date, no longer than one year from date reviewed]
Activity	[What activity are you applying this to? Where and when is it taking place? Who is involved?] <i>Example:</i> <ul style="list-style-type: none"> Overnight for 3 nights, students aged between 15 and 19 years.
Completed by:	
Completion date:	

Potential Risks	Likelihood	Consequence	Risk Rating	Existing Risk Controls	New controls required
<i>Refer to Stage 1 – Identifying Risk</i>	<i>Refer to the Likelihood table</i>	<i>Refer to the Consequence table</i>	<i>Refer to the Risk Matrix Tool</i>	<i>What does AEPL currently have in place to minimise the identified risk?</i>	<i>Are there any gaps in AEPL's existing controls?</i>
Mixture of age groups within activity: <ul style="list-style-type: none"> Bullying Peer pressure Conversations of an inappropriate nature for younger children Child-on-child abuse 	Possible	Major	High	<ul style="list-style-type: none"> AEPL's Child Safe Code of Conduct only applies to adult behaviour, not children. Complaints system does not provide avenues for children to raise concerns. 	<ul style="list-style-type: none"> Adopt a Code of Conduct that addresses student behaviour towards their peers. Implement a child safety feedback/complaints form.

Appendix D – Child Safe Checklist: Overnight Stays

A new Checklist should be completed by the Study Centre Manager (with assistance from Leaders) prior to the commencement of any activity or event that involves an overnight stay. This Checklist must be completed **in addition** to the Child Safe Risk Assessment Template. The **red text** is example text only and should be removed when completing the template.

AREA	EVIDENCE OF COMPLETION	✓
Staff / Volunteers		
1. Do all staff / volunteers engaged in the activity have valid WWCC's (unless a valid exemption applies)?	Yes, refer to AEPL's WWCC register.	✓
2. Have the WWCC clearances of all adults attending the overnight stay been verified?		
3. Have all staff / volunteers completed Child Safe Training prior to working or volunteering at the overnight stay?		
Consent		
1. Does the Centre have parental consent forms completed for all students (under 18)?		
2. Does the Centre have photo approval forms signed by parents/guardians prior to commencement of the overnight stay?		
3. Does the Centre have transport / drop off – pick up consent forms completed for all students (under 18)?		
Communication		
1. Has the Centre delivered an information session with all stakeholders involved in the activity, including children, parents/guardians, staff and volunteers, on the following key areas: <ul style="list-style-type: none"> • Behavioural expectations • Information about who the child can speak to if they have any concerns • Appropriate and inappropriate items to bring • Communication with their parents/guardians if they feel unsafe 		

<ul style="list-style-type: none"> Prohibition of alcohol/drugs 		
2. Has the Centre provided a copy of and discussed the Child Safe Policy and Code of Conduct with all stakeholders involved in the activity, including children, parents/guardians, staff and volunteers?		
Physical Environment		
1. Has a Child Safe Risk Assessment been completed and have relevant risk controls been implemented?		
2. Are there any hidden or concealed areas at the venue or facility location of the overnight stay?		
3. Does the facility allow for the allocation of separate toilets/change rooms for adults and children, including separate facilities for: <ul style="list-style-type: none"> Staff / volunteers and students Students who are under 18 and over 18 		
Supervision		
1. Is there a minimum of 2 staff / volunteers (suitable to work with children) always available to supervise children throughout the overnight stay?		
2. Is there a curfew in place for children?		
3. Do staff / volunteers supervise interactions between children of the same age, and older children who may be mentoring younger children?		
Sleeping Arrangements		
1. Are there appropriate sleeping arrangements in place to ensure:		
<ul style="list-style-type: none"> Children are provided with privacy when bathing and dressing 		
<ul style="list-style-type: none"> Children that share a room are the same age and sex 		
<ul style="list-style-type: none"> Children and adults do not share rooms (unless the adult is the child's parent) and there are no other children allocated to that room 		

<ul style="list-style-type: none"> Children do not share beds or sleeping bags with other children, or staff / volunteers 		
<ul style="list-style-type: none"> Supervising staff/volunteers are not alone in sleeping areas with children – if required in a room, more than one adult should be present. 		
<ul style="list-style-type: none"> Staff / volunteers sleep adjacent to children’s rooms to enable effective supervision 		
Toilets and Change Rooms		
1. Are there appropriate gender specific bathroom and shower facilities available?		
2. Are there appropriate procedures in place to ensure:		
<ul style="list-style-type: none"> Staff/volunteers do not accompany a child to the toilet/changeroom 		
<ul style="list-style-type: none"> Children do not bathe/shower with other children (only one individual per shower area) 		
<ul style="list-style-type: none"> Under 18 and over 18 students do not use change room / bathroom facilities at the same time 		
Use of Swimming Facilities		
1. Is there an adequate ratio of staff / volunteers present to supervise children when using swimming facilities?		
2. Are there appropriate procedures in place to ensure:		
<ul style="list-style-type: none"> Supervising staff/volunteers are competent swimmers 		
<ul style="list-style-type: none"> Appropriate swimming attire is worn by children, and by staff / volunteers when supervising 		
<ul style="list-style-type: none"> Staff / volunteers do not use the swimming pool when children are present. Supervision should be conducted from the pool deck. 		
<ul style="list-style-type: none"> There is no bullying / rough play in the swimming area 		
Behavioural Guidelines		
1. Are staff and volunteers made aware of their responsibility to:		

<ul style="list-style-type: none"> • Set and communicate the standard of behaviour required while on camp 		
<ul style="list-style-type: none"> • Address bullying, harassment, or inappropriate behaviour promptly 		
<ul style="list-style-type: none"> • Respond to inappropriate behaviour between children in accordance with AEPL's <i>Child Safe Code of Conduct</i> 		