Child Safe Standards Risk Register

Help for non-English speakers

If you need help to understand the information in this policy, please contact the school 9387 6133 or brunswick.sc@education.vic.gov.au

School name:	**Brunswick Secondary College**	Responsible staff member:	**Claudia Johnson, Assistant Principal**
Date endorsed:	**March 2023**	Endorsed by:	**Karen Harris, Principal**
Next review date:		File location:	**Staff Team	Policy Channel**

RISK TITLE AND DESCRIPTION	RISK ASSESSMENT		EXISTING CONTROLS	CONTROLS ASSESSMENT	NEW TREATMENTS AND WHO IS RESPONSIBLE?	BY WHEN?
Provide a risk title and short description.	*Describe the causes of the child safety risk.*	*Describe the **consequences** for children if the child safety risk happens*	*Describe the existing **child safety and wellbeing controls** you have in place to mitigate the child safety risk* **Sample content is provided below**	*Taken together, are the controls adequate to reduce the risk and harms to a tolerable level?*	*If controls need to be strengthened, describe any new controls you will implement to mitigate the child safety risk and who is responsible for the new treatments?*	*When will this be done?*
Child Safe Standard 1 – Aboriginal cultural safety						
Risk Title: Culturally safe environments Description: There is a risk that the school fails to establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and students are respected and valued Risk type:	• Racism, discrimination and bullying not adequately managed and addressed • Ignorance/lack of awareness • Curriculum that doesn't include Aboriginal Australians • An unwelcoming environment for Aboriginal students • Policy development and review is not consultative	• Aboriginal students are less likely to trust school staff which may result in them being less likely to report abuse by adults or peers, and make them more vulnerable to harm • Aboriginal students do not feel welcome, safe, respected or valued for their diverse and unique identities which may result in them being less likely to report abuse by adults or peers and make them more vulnerable to harm • Physical and psychological harm as a result of child abuse	• Our Child Safety Policy outlines the controls in place to establish a culturally safe environment and is implemented • Other documents that address Aboriginal cultural safety include: • Student Wellbeing and Engagement Policy • Bullying Prevention Policy • Inclusion and Diversity Policy • Controls to address racism, discrimination and bullying are outlined in the Bullying Prevention Policy and the Student Wellbeing and Engagement Policy.	Yes	• Identify other actions your school may take using the guidance available at PROTECT Child Safe Standard 1 (Principal)	

BRUNSWICK
SECONDARY COLLEGE

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Situational, Organisational						
Child Safe Standard 2 – School leadership, governance and culture						
Risk Title: Leadership, governance and culture Description: There is a risk that child safety and wellbeing is not embedded in the school's leadership, governance and culture Risk type: Organisational, Propensity	• Child safety is not prioritised • Decision-making power concentrated in one individual • Unclear accountabilities • Staff and volunteers are unaware of the school's expectations relating to their conduct and role in supporting child safety and wellbeing • Culture of secret keeping • Poor management of conflicts of interest • Lack of leadership on child safety • Poor understanding of the foreseeable risks relating to child abuse • Poor understanding of recordkeeping and information management • Poor child safety messaging	• Increased risk of child abuse occurring, remaining undetected and not being responded to appropriately because the school does not have a culture of child safety and reporting of child safety incidents or concerns • Increased risk of child abuse occurring, remaining undetected and not being responded to appropriately because staff and volunteer roles and responsibilities are not clear • Poor practices and understanding of information sharing obligations may result in staff or volunteers not sharing important information to reduce the risk of child abuse or conversely, sharing sensitive information inappropriately contributing to further harm. • Poor records and record-keeping practice can contribute to delays or failures to identify and respond to child safety risks and incidents and can obstruct survivors seeking information about their time at our school. It can also compromise the school's ability to monitor for systemic issues that require changes to policy, procedure or practice. • Physical and psychological harm as a result of child abuse	• Our Child Safety outlines the controls in place to ensure a child safe culture is embedded across the school and is implemented • Our Child Safety Code of Conduct is adopted and actively enforced by school leadership. Inconsistent staff, contractor or volunteer conduct is swiftly addressed. • Our Child Safety Policy and Code of Conduct are publicly available and promoted in the school community • This risk register is reviewed annually and after any significant child safety incident or concern • Our Volunteers Policy supports volunteers to understand their obligations on information sharing and recordkeeping • PROTECT posters and the Four Critical Actions are displayed around the school • Records management obligations are met through adherence to the Records Management - School Records Policy and all staff and relevant volunteers understand their obligations on information sharing and record keeping through induction, training and support from leadership.	Yes	• Identify other actions your school may take using the guidance available at PROTECT Child Safe Standard 2 (Principal)	
Child Safe Standard 3 – Children are safe, informed and actively participate						
Risk Title: Student empowerment Description: There is a risk that students will not be empowered about their rights, participate in decisions affecting them or be taken seriously	• Students don't know how to make a complaint or raise a concern or don't feel confident that they will be listened to • Students don't understand their rights • Student input in decision making is not supported or valued • Student contributions or concerns are not taken seriously • Students are not offered sexual abuse prevention education	• Abuse is more likely to happen if students do not feel supported to participate in decisions that affect them and do not feel like they will be listened to. • Failure to empower students with information about their rights, child safety risks, and sexual abuse prevention will increase the risk of abuse going unidentified and unspoken • If students do not feel confident or empowered to raise a concern, they will be unwilling to report abuse	• Our Child Safety Policy outlines the controls in place to support child and student empowerment and is implemented • Complaints Policy details how students can raise complaints and concerns and is promoted widely to parents and students • Student Wellbeing and Engagement Policy outlines the controls in place to ensure student wellbeing is supported and prioritised	Yes	• Identify other actions your school may take using the guidance available at PROTECT Child Safe Standard 3 (Principal)	

BRUNSWICK
SECONDARY COLLEGE

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Risk type: Vulnerability	• Students are coerced or silenced by adults at the school • Lack of friendship or peer support	• Lack of friendship or peer support may increase vulnerability to abuse • Lack of friendship or peer support increases the risk that the student will not feel confident to discuss concerns with their peers, making it more likely that abuse will go unidentified and unspoken • Physical and psychological harm as a result of child abuse	• Students are provided with age-appropriate sexual abuse prevention programs and relevant related information through Resilience, Rights and Respectful Relationships teaching and learning materials • Students are educated about their rights through Home Group and can access information on their year level team • Friendship and peer support are promoted through Home Group, Peer support Program and Co-Curricular Programs.			
Child Safe Standard 4 – Family engagement						
Risk Title: Families and community involvement Description: There is a risk that families and communities are not informed, and involved in promoting child safety and wellbeing Risk type: Organisational	• Unwelcoming staff • Lack of appreciation of the value of community consultation and engagement • The school does not offer information to families and communities or avenues to contribute to policies and decisions relating to child safety and wellbeing • Lack of staff training, culture or willingness to engage families and communities	• Child safety and wellbeing practices without input from families may result in practices that do not cover all the diverse needs of students, resulting in a risk that students do not feel safe or able to actively participate in school life (see Child Safe Standard 1 and 3) • Families and communities not engaged in child safety at the school are less likely to be able to support the school to reduce risk by keeping an eye out for unsafe behaviours and raising concerns. • Families cannot help students identify abuse • Families do not support students who want to make a complaint • If families lack awareness about child safety including risks of child abuse, children may be more vulnerable to being groomed by perpetrators seeking to obtain their trust. • Physical and psychological harm as a result of child abuse	• Our Child Safety Policy outlines the controls in place to engage families and is implemented • All child safety and wellbeing policies and procedures are publicly available and promoted in the school community • Families and the school community are invited to have a say in the development and review of child safety and wellbeing policies, procedures and practices through our school website and newsletters	Yes	• Identify other actions your school may take using the guidance available at PROTECT Child Safe Standard 4 (Principal)	
Child Safe Standard 5 – Equity and diverse needs						
Risk Title: Diversity and equity Description: There is a risk that equity is not effectively upheld, and diverse needs are not	• Diverse cohorts have not been identified for targeted support (such as students with disability, students who identify as lesbian, gay, bisexual, transgender, intersex and queer (LGBTIQ+), students in out of home care, international students and students who are culturally and linguistically diverse) • Diverse cohorts not supported adequately	• Diverse cohorts who do not feel safe or who are not adequately supported for their diverse and specific needs are more at risk of abuse and harm and will be less able or willing to report concerns. • Experiencing discrimination can increase a child's vulnerability to abuse and harm and	• Our Child Safety Policy outlines the controls in place to support equity and diverse needs and is implemented • Student Wellbeing and Engagement Policy outlines how the school pays particular attention to the needs of students with disability, students from culturally and linguistically diverse backgrounds, students	Yes	• Identify other actions your school may take using the guidance available at PROTECT Child Safe Standard 5 (Principal)	

BRUNSWICK SECONDARY COLLEGE

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respected in policy and practice Risk type: Vulnerability	• Diverse cohorts feel unwelcome • Lack of staff training on diversity and supporting and responding to vulnerable students • Lack of respectful culture • Incidents of discrimination or humiliation are not effectively addressed and managed	can also mean they are less likely to ask for help or speak up if they have a concern • Physical and psychological harm as a result of child abuse	who are unable to live at home, international students, and lesbian, gay, bisexual, transgender, intersex and queer (LGBTIQ+) students • Child safety information, support and complaints processes are culturally safe, accessible and easy to understand • Other documents that address diversity and equity include, such as: • Bullying Prevention Policy • Inclusion and Diversity Policy • Implement: • Resilience, Rights and Respectful Relationships and Building Respectful Relationships teaching and learning materials • Respectful Relationships whole school approach			
Child Safe Standard 6 – Suitable staff and volunteers						
Risk Title: Suitable staff (including contractors engaged by the school in child-related work) Description: There is a risk that staff are not suitable to work with children or effectively supported to uphold child safety and wellbeing values in practice Risk type: Organisational, Propensity	• Poor recruitment and pre-employment screening processes • Provision of false information during recruitment • Poor management of conflicts of interest • Insufficient induction on commencement of working at school • Inappropriate behaviour by other adults is not called out due to lack of empowerment or awareness of behaviours of concern • Insufficient promotion of the school's commitment to child safety • Lack of child safety culture • Insufficient supervision • Performance management does not focus on or address concerns relating to child safety and wellbeing	• Insufficient promotion of the school's commitment to child safety during recruitment processes may fail to deter potential predators from seeking employment • History and behaviours of concern relating to suitability to work with children are not identified resulting in increased risk of child abuse • Conflicts of interests in recruiting staff may increase the risk of other staff not reporting concerns relating to staff conduct, and where concerns are reported or identified, increased risk of them not being responded to in an objective manner with the focus on child safety and wellbeing. • Insufficient induction results in the increased risk that staff fail to identify child safety risks and signs of harm and are unable to respond appropriately when they do identify risks of harm or when a complaint or concerns is disclosed to them. • Insufficient supervision and performance management results in increased risk of child abuse and harm to students	• Our Child Safety Policy outlines the controls in place: • for child safe recruitment and screening practices for staff. • to ensure staff are provided with an appropriate induction in the school's child safety policies and practices. • to ensure ongoing supervision and management of staff is focused on child safety and wellbeing • All actions and strategies outlined in our Child Safety Policy are implemented	Yes	• Identify other actions your school may take using the guidance available at PROTECT Child Safe Standard 6 (Principal)	

BRUNSWICK
SECONDARY COLLEGE

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		• Staff do not understand their role and responsibilities in promoting and supporting child safety resulting in increased risk of harm • Physical and psychological harm as a result of child abuse				
Risk Title: Suitable Volunteers Description: There is a risk that volunteers are not suitable to work with children or effectively supported to uphold child safety and wellbeing values in practice Risk type: Organisational, Propensity	• Screening processes lack sufficient strength to reveal histories and behaviours of concern • Systems, processes, policies and culture do not demonstrate sufficient strength and transparency to deter potential perpetrators from attempting predatory behaviours • Conflict of interest • Lack of child safety culture • Insufficient induction and training • Insufficient supervision	• Insufficient promotion of the school's commitment to child safety may fail to deter potential predators from volunteering at the school • History and behaviours of concern relating to suitability to work with children are not identified resulting in increased risk of child abuse • Insufficient induction results in the increased risk that volunteers do not understand their role and responsibilities in promoting and supporting child safety resulting in increased risk of harm. • Insufficient supervision results in increased risk of child abuse and harm to students • Inadequate steps to address concerning behaviour may result in increased risk of harm (for example removing volunteer from duties or otherwise ensuring the volunteer does not demonstrate further behaviours of concern) • Physical and psychological harm as a result of child abuse	• Volunteer Policy outlines the controls in place to ensure volunteers are suitable to work with children including screening, induction, and ongoing management and supervision • Volunteer who will be engaging closely with students (e.g. in a school production where staff supervision may not always be present) and volunteers who are not parents/carers of students will be asked to undertake additional screening processes including proof of identity (where this has not already been established), and references addressing suitability for working with children. • Volunteers that are working with children or that may have access to students in unsupervised or high-risk settings will always be supervised by a member of school staff • Volunteer behaviour that is inconsistent with the school's child safety policies and practices will be addressed by school staff swiftly and with a focus on child safety and wellbeing.	Yes	• Identify other actions your school may take using the guidance available at [PROTECT Child Safe Standard 6](#) (Principal)	
Child Safe Standard 7 – complaints processes						
Risk Title: Complaints processes Description: There is a risk that processes for complaints and concerns are not child focused Risk type:	• Students and parents/carers are uncertain about how to raise a complaint or concern because information is not accessible or easily understood • Processes do not support students, parents and carers to make complaints or raise concerns • Complaints processes or responsible staff do not make students feel safe or supported to report • Student input in decision making is not valued	• Failure to ensure there is accessible, culturally safe and easily understood information on how to raise a complaint or concern increases the risk of students, parents and carers not reporting behaviours of concern or abuse • Students may be unwilling to report behaviours of concern or abuse if they feel they will not be taken seriously or if they do not feel safe to report • Failure to have a clear process for responding to complaints and concerns about	• Complaints Policy outlines the controls in place to ensure students are provided with accessible, culturally safe and easily understood information on raising a complaint or concern • Child Safety Responding and Reporting Obligations Policy and Procedures outlines the procedures for responding to complaints or concerns relating to child abuse • The Complaints Policy and Child Safety Responding and Reporting Obligations	Yes	• Identify other actions your school may take using the guidance available at [PROTECT Child Safe Standard 7](#) (Principal)	

BRUNSWICK SECONDARY COLLEGE

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Organisational, Vulnerability	• Student, parent and carer concerns/complaints are not taken seriously • Inadequate response to complaints or concerns relating to child abuse	child abuse may result in inappropriate or insufficient action being taken resulting in continued or further harm to the child and other children • Physical and psychological harm as a result of child abuse	Policy and Procedures are publicly available on the school website • The Complaints Policy and Child Safety Responding and Reporting Obligations Policy and Procedures are implemented by all relevant staff • Our Child Safety Policy sets out all recordkeeping, privacy and information sharing obligations that must be met when responding to complaints and concerns. • All complaints and concerns are managed in accordance with employment law obligations and our school seeks advice from Employee Conduct Branch and Legal Division when dealing with complaints and concerns relating to child abuse by a member/former member of staff or school council employee or contractor			
Child Safe Standard 8 – Child safety knowledge, skills and awareness						
Risk Title: Knowledge, skills and awareness Description: There is a risk that staff and volunteers are not equipped with the knowledge, skills and awareness to keep children and students safe through ongoing education and training Risk type: Organisational	• Child safety and wellbeing training not provided to staff and school council annually • Child safety and wellbeing training is not refreshed or updated where policy, practice or law has changed • Volunteers are not required to undertake child safety training that is appropriate to the nature of their role • Training does not cover all necessary topics • Training is poorly facilitated • • Also refer to Child Safe Standard 6 risks above	• Inability to identify child safety risks including inappropriate behaviour and signs of harm resulting in increased risk of failing to protect children from child abuse, and underreporting of child safety incidents to relevant staff and authorities • Insufficient understanding about the school's child safety and wellbeing policies, practices, and obligations results in increased risk that they will not be appropriately implemented by staff and volunteers and an increased risk to students of child abuse occurring and or continuing to occur undetected. • Physical and psychological harm as a result of child abuse	• Our Child Safety Policy outlines the controls in place to ensure school council and school staff receive appropriate annual guidance and training on child safety and is implemented • Our Volunteers policy provides information on training for volunteers. • Volunteers who will be engaging closely with students in a school production where staff supervision may not always be present are provided with child safety training that is appropriate to the activity and the volunteer's role.	Yes	• Identify other actions your school may take using the guidance available at [PROTECT Child Safe Standard 8](#) (Principal)	
Child Safe Standard 9 – Physical and online environments						
Risk Title: School physical environment	• Areas of child safety risk in the school buildings or grounds are not identified and appropriately supervised or managed.	• There is an increased risk of child abuse occurring on school grounds or buildings if policies, procedures and practices fail to	• Yard Duty and Supervision Policy outlines supervision processes and requirements with a focus on child safety	Yes	• Identify other actions your school may take using the guidance	

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Description: There is a risk the school's child safety policies, procedures and practices do not adequately address and manage the risk of abuse and harm in the school's physical environment Risk type: Situational		• identify and manage areas of risk in the school's physical environment • Physical and psychological harm as a result of child abuse	• Yard duty staff are trained to actively patrol the school grounds, paying particular attention to secluded areas that have been identified as high risk including toilets and areas where students might enter through doors not being locked, such as F Block foyers, D Block foyer and B Block corridor. • Child safety policies, procedures and practices are in place to enable staff and volunteers to identify and mitigate risks in the physical school environment without compromising a child or student's right to privacy, access to information, social connections and learning opportunities, including our Child Safety Policy and Child Safety Code of Conduct • garden sheds and store cupboards are locked unless in use, with controlled access to keys • school grounds are well lit for after school activities • toilets and changing rooms are located in a central area of the school and the entrance and exit has good visibility from other areas of the school and CCTV		available at PROTECT Child Safe Standard 9 (Principal)	
Risk Title: Online environment Description: There is a risk the school's child safety policies, procedures and practices do not adequately address and manage the risk of abuse and harm in the school's online environment Risk type: Situational	• Child safety risks in the school's online environment are not identified and appropriately managed. • Students are not provided with education about online risks and appropriate online behaviours. • Online safety measures fail to adapt to emerging technologies and child safety risks	• There is an increased risk of child abuse occurring if policies, procedures and practices fail to identify and manage areas of risk in the school's online environment – particularly risks relating to grooming and further risk of abuse if the grooming goes undetected. • Physical and psychological harm as a result of child abuse	• Digital Learning Policy outlines the controls in place for online conduct and online safety and is implemented • Acceptable Use Agreements are in place and enforced • Child safety policies, procedures and practices are in place to enable staff and volunteers to identify and mitigate risks in the online school environment without compromising a child or student's right to privacy, access to information, social connections and learning opportunities, including our Child Safety Policy and Child Safety Code of Conduct • Staff undertake a privacy impact assessment for apps and other platforms in use by the school which includes the risk of access to children or personal information by people external to the school.	Yes	• Identify other actions your school may take using the guidance available at PROTECT Child Safe Standard 9 (Principal)	

BRUNSWICK SECONDARY COLLEGE

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Risk Title: Off-site school activities and use of third-party providers Description: There is a risk that the school's child safety policies, procedures and practices do not adequately address and manage the risk of abuse at school activities off-site and/or school activities involving third party providers. Risk type: Situational, Organisational, Propensity, Vulnerability	• School staff fail to identify and manage risks of child abuse occurring during off-site school activities • School staff fail to identify and manage risks of child abuse by third-party providers engaged by the school	• There is an increased risk of child abuse occurring if policies, procedures and practices fail to identify and manage areas of risk for off-site school activities and school activities that involve third party providers. • Physical and psychological harm as a result of child abuse	• Our school complies with relevant policies with respect to the following activities, including policy relating to child safety and wellbeing: • Excursions • Doctors in Secondary Schools • NDIS Funded Therapy in Schools • Work Experience • Procurement • Structured Workplace Learning • School Based Apprenticeships and Traineeships • School Community Work • Purchasing Secondary Courses and Vocational Training from External Providers • Community VCAL • For others, see the Policy and Advisory Library • For off-site school activities and school activities engaging a third-party provider, we identify and assess the risks of child abuse that are specific to that activity and ensure appropriate controls are in place. This includes activities such as: EdConnect mentoring, provisional psychologist counselling, Herbert Freehills Smith mentoring, and Embrace homework club support.	Yes	• Identify other actions the school may take using the guidance available at PROTECT Child Safe Standard 9 (Principal)	
Child Safe Standard 10 – Review of child safety practices						
Risk Title: Review and improvement Description: There is a risk that the implementation of the Child Safe Standards is not regularly reviewed and improved Risk type:	• Failure to regularly review child safety policies, procedures and practices (every 2 years) or following any significant child safety incident • Failure to use analysis of complaints, concerns and safety incidents to inform possible improvements to child safety policies, procedures and practices • Failure to inform families and communities of the outcome of reviews of child safety policies, procedures and practices	• Child safety policy, procedures and practices may become out of date with any new laws or guidance on good practice, compromising the school's ability to protect students from child abuse and to respond appropriately to complaints and concerns. • Child safety policy, procedures and practices may no longer meet the needs of the local school community compromising the school's ability to protect students from child abuse and to respond appropriately to complaints and concerns.	• A register of the school's policies relating to the child safe standards, including approvers and review cycles is used to support staff to maintain and update our policies • A working group (led by the child safety champion) is established to review child safety policies and procedures • We determine the causes of child safety incidents and monitor for repeat issues or systemic failures, updating any child safety policy, procedure or practice where gaps or improvements are identified	Yes	• Identify other actions the school may take using the guidance available at PROTECT Child Safe Standard 10 (Principal)	

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Organisational		• Child safety policy, procedures and practices are not improved as a result of analysis of past complaints, concerns and safety incidents, reducing the school's ability to protect students from child abuse and to respond appropriately to complaints and concerns. • Physical and psychological harm as a result of child abuse	• We inform families through our school's newsletter when child safety and wellbeing policies are being reviewed and ensure they are invited to provide feedback			
Child Safe Standard 11 – Implementation of child safety practices						
Risk Title: Policies and procedures Description: There is a risk that policies and procedures do not effectively document how the organisation is safe for children and students and are not effectively implemented by staff and volunteers. Risk type: Organisational	• The policies and procedures do not address all actions and measures required under the Child Safe Standards • The policies and procedures are not informed by best practice models and family and community engagement • Staff and relevant volunteers are not provided with an adequate induction or ongoing training and are not properly supported to implement the policies and procedures due to lack of modelling and support from leaders • Policies and procedures are difficult to understand	• If child safety policy and procedures fail to address all aspects of the Child Safe Standards it will result in gaps in protection of children and increased risk relating to child abuse • If child safety policies and procedures are not effectively documented or are difficult to understand it may result in staff (particularly new staff) being unaware of their child safety obligations, roles and responsibilities increasing the risk of child abuse • If child safety policies and procedures are not informed by best practice or family and community engagement it may result in compromised ability to protect children from child abuse. • Failure to induct, train and support staff and relevant volunteers on implementation of child safety policies and procedures increases the risk of child abuse • Physical and psychological harm as a result of child abuse	• Our suite of child safety and wellbeing policies and procedures address all aspects of the Child Safe Standards • Our staff and relevant volunteers are inducted and trained on our child safety and wellbeing policies, procedures and practices and are supported to implement them • Our school leaders champion and model our child safety policies, procedures and practices and address any performance concerns relating to staff conduct or implementation • Our Child Safety Champion regularly reviews PROTECT guidance and other relevant policies to ensure our own local child safety policies, procedures and practices are informed by best practice and updated where required.	Yes	• Identify other actions your school may take using the guidance available at PROTECT Child Safe Standard 11 (Principal)	