

Child Safe (U18) Risk Management Strategy – Higher Education

1. Scope

This Risk Management Strategy (RMS) is applicable to Holmes Institute Higher Education staff and students. The RMS provides direction, strategies, guidelines and procedures developed to help staff support and manage students under the age of 18 enrolled at Holmes. It should be noted that Holmes Institute does not enrol any students under 16 or any international students under the age of 18 into its Higher Education Programs. This Strategy should be read in conjunction with Holmes Child Safety Policy – Higher Education and the Child Safety Code of Conduct – Higher Education.

2. Definitions

- 2.1 **Breach** is any action or inaction deemed contrary to Holmes' Child Safety – Code of Conduct policies and this Risk Management Strategy.
- 2.2 **Parents** refers to the parent or legal guardian of an under 18 student.
- 2.3 **Staff** refers to all Holmes staff - paid and unpaid, including but not limited to office staff, educators, and volunteers.
- 2.4 **Student** refers to domestic students over the age of 16 and under the age of 18.

3. Statement of Commitment

- 3.1 Holmes is committed to providing age and culturally appropriate, welfare arrangements for the student's accommodation (where relevant), support and general welfare in accordance with industry, best practice standards and legislation noted within the following state links:

Victoria:

<https://www.legislation.vic.gov.au/in-force/acts/child-wellbeing-and-safety-act-2005/035>
<https://www.legislation.vic.gov.au/in-force/acts/children-youth-and-families-act-2005/121>

NSW:

<https://legislation.nsw.gov.au/view/html/inforce/current/act-1998-157>

QLD:

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010>

- 3.2 All staff working with students are expected to be familiar with and will be provided training in regards to relevant standards and legislation and this Risk Management Strategy.

- 3.3 Holmes is committed to ensuring the safety and wellbeing of all under 18 students and will endeavour to provide a safe environment so the student can successfully pursue their academic and personal development. The following values reflects Holmes Under 18 student management culture - All students have the right:
- a. to feel safe,
 - b. be listened to and heard,
 - c. be involved in decisions that affect them,
 - d. to have their cultural values respected,
 - e. not to be unjustly discriminated against on the basis of their status, activities, expressed opinions or those of their families or carers, and
 - f. to have their best interests considered (with parental/guardian consent).

4. Holmes' strategy for inclusion, engagement and empowerment regarding Under 18 students

- 4.1 All staff are expected to possess valid Working with Children Checks (WWCCs) and to be familiar with and effectively implement this strategy, the Child Safety Policy – Higher Education and the Child Safety Code of Conduct – Higher Education.
- 4.2 Where possible, a staff member will monitor the interactions of under 18's with those aged 18 or over, during all approved activities to ensure the safety and wellbeing of the students under 18.
- 4.3 Staff should avoid taking video or photography where images of students under 18 may be included. Where video or photography of such students is taken, written consent of the child and their parent (or guardian) must be sought prior to recording or the subsequent display or distribution of that photo or visual material.
- 4.4 Permissions to record and produce material involving students under 18 should be documented via a Consent form that should be signed by the student and their parent or guardian and filed appropriately in the students e-file.
- 4.5 Students are made aware of their rights and obligations at Holmes at Orientation. Students are expected to maintain regular class attendance (above 80%).

5. Recruitment, selection, training and management procedures for staff

- 5.1 Holmes' organisational recruitment processes will ensure the recruitment and selection of suitable staff.

6. Reporting directions and guidelines for handling risks, disclosures and suspicions of harm

- 6.1 What is "harm"?
 - a. Harm is defined as "any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing."
 - b. Harm can be caused by physical, psychological, or emotional abuse or neglect; or sexual abuse or exploitation.
- 6.2 Types of harm

Type	Examples	Indicators of abuse and neglect
Physical	<ul style="list-style-type: none"> Hitting, providing any inappropriate substances such as poisons, alcohol, illegal drugs or medication Domestic and family violence 	<ul style="list-style-type: none"> showing wariness and distrust of adults low self-esteem, withdrawn abusing alcohol or drugs being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable feeling suicidal or attempting suicide being reluctant to go home malnutrition, poor hygiene, matted hair, dirty skin or body odour unattended physical or medical problems comments from a child that no one is home to provide care being constantly tired frequent lateness or absence from school being left unsupervised for long periods fear of going home
Psychological or Emotional	Verbal insults, hostility, bullying, cultural affront	
Neglect	Not providing sufficient food, housing and hygienic living conditions	
Sexual/exploitation	<ul style="list-style-type: none"> Inappropriate touching, kissing or holding a sexual manner Exposing a sexual body part to a child Exposing children to sexual acts or pornography Making obscene phone calls or remarks to a child 	

6.3 Handling risks, disclosures and suspicions of harm:

- a. Risks, disclosures or suspicions of harm involving a student should be reported to the U18 Welfare Officer in the first instance, where possible.
 - i. If the incident is considered serious, the staff member is encouraged to firstly, act to ensure the young person's safety and wellbeing.
 - ii. At the earliest opportunity, the staff member must provide the U18 Welfare Director with written details of the incident.
 - iii. In the event of a conflict of interest, referrals should be made to the Campus Director to determine the appropriate actions to resolve matters.
- b. The U18 Welfare Director will then make a confidential written report to the CEO who will in turn escalate the report to the SMG for consultation. The SMG will report to the Governing Council should the matter require further attention.
- c. Depending on the outcome of the assessment for harm or risk of harm (refer to 6.2 above), the incident/matter may be referred to Police, or other

Holmes staff for follow-up.

- d. In all instances, principles of privacy and confidentiality will be maintained in so far as legislatively permissible.

The U18 Welfare Director will action any mandatory reporting in accordance with relevant state and federal child safety requirements.

6.4 Managing and recording suspicion of harm or a disclosure of harm:

- a. If there are suspicions of harm or concern for a child's welfare, staff should:
 - i. Remain alert to any warning signs or indicators;
 - ii. Pay close attention to changes in the student's behaviour, ideas, feelings and the words they use;
 - iii. Make written notes of observations in a non-judgemental and accurate manner; and
 - iv. Assure the student that they can come to talk when they need to, and listen to them and believe them when they do, and follow any relevant process for reporting a suspicion of harm and consider whether there are requirements to report matters to the Police Service and/or what support services could be offered if the concern does not meet the relevant reporting process.
- b. Any disclosure of harm must be documented. In the first instance, staff should:
 - i. Remain calm and listen attentively, actively and non-judgementally;
 - ii. Ensure there is a private place to talk;
 - iii. Encourage the person to talk in their own words and ensure just enough open-ended questions are asked to act protectively (e.g. 'Can you tell me what happened' or 'Can you tell me more about that');
 - iv. Reassure the person they have done the right thing by telling you; and
 - v. Advise the person/ and where appropriate the relevant child that the disclosure will be treated confidentially but cannot remain a secret as it may be necessary to tell someone in order to get appropriate help'
- c. Document the disclosure clearly and accurately, including a detailed description of:
 - i. The relevant dates, times, locations and who was present;
 - ii. Exactly what the person disclosing said, using "I said," "they said," statements;
 - iii. The questions you asked;
 - iv. Any comments you made; and
 - v. Your actions following the disclosure.
- d. Do not attempt to investigate or mediate an outcome.
- e. Follow any relevant process for reporting a disclosure of harm consistent with 6.3 above.

6.5 Assessing harm:

- a. Gather information:
 - i. Facts
 - Gather information from student, homestay host/s and other parties,
 - Record and document alleged harm, risk of harm, student’s details, family context, social and cultural factors
 - Who, what, when, where
 - ii. History – has this occurred in the past?
 - iii. Risk factors – identify features that may heighten risk or risk of harm (environment, person/s, interactions)
 - iv. Protective factors – identify features that may decrease risk or risk of harm (environment, person/s, interactions)
- b. Assess harm and risk of harm
 - i. Assess immediate safety – is the student in immediate danger, needs removing and be placed elsewhere?
 - ii. Gather evidence to determine decision if student needs to be placed elsewhere – severity of harm or risk of harm, probability and vulnerability
 - iii. How likely will this occur again?
- c. Decide on response based on risk assessment
 - i. Decide on outcome – e.g. if student moved from a Homestay that no other students are placed in the homestay unless justifiable.
- d. Review the risk control and assessment outcome

6.6 Reporting guidelines for Harm:

- a. Staff – report risk matters related to an under 18 student to the U18 Welfare Director and/Campus Director (and follow processes as outlined in 6.3 above).
- b. Others – any person can report an incident to the following contacts:
 - i. Triple 000 if you believe child is in immediate danger of life-threatening situation
 - ii. Holmes 24/7 Emergency Contact numbers available here - <https://www.holmes.edu.au/pages/services/student-welfare> and also outlined in the Critical Incident Policy.

7. Managing breaches of risk management strategy

7.1 Any identified breaches of standards outlined in Child Safety policies and standards will be risk managed by the Campus Director in liaison with the U18 Welfare Director. This includes the identification of a risk mitigation plan and a subsequent review of the risk control.

7.2 The below provides a non-exclusive overview of proposed controls for potential breaches:

<i>Breach</i>	<i>Control</i>	<i>Who is responsible?</i>
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Breach	Control	Who is responsible?
Staff member breaches code of conduct/policy guidelines	<ul style="list-style-type: none"> • Providing further education and training • Mediating between those involved in the incident • Suspension/ Termination of staff member if breach is determined serious enough to warrant termination. 	U18 Welfare Director/Campus Director HR Director
Staff or other person who has regular contact with student does not have WWCC	<ul style="list-style-type: none"> • Emphasising the requirement for WWCC for U18 work with relevant parties • Suspension or termination of staff member is possible if WWCC is not forthcoming. 	Campus Director HR Director

8. Risk Management for Planned Extra –Curricular Activities

8.1 From time to time, Holmes may coordinate extra-curricular activities for students' engagement. In such instances, the U18 Welfare Director will initially assess the risk of the activity for approval by reviewing the following:

- a. The nature and purpose of the activity
 - i. What are this activity's objectives?
 - ii. Please describe the proposed activity from start to finish?
 - iii. Where is the activity taking place?
 - iv. What environmental factors need to be considered?
 - v. Who is involved in the activity? Parents? Staff? Children? Will people external to the organisation?
- b. What is the level of child abuse risk in relation to the activity
 - i. How might a child be harmed?
 - ii. Where or when might harm occur?
 - iii. How might harm occur?
 - iv. Why might harm occur?
- c. An analysis of the risks - The purpose of risk evaluation is to make decisions, based on the outcomes of risk analysis. The level of risk will determine whether a high-risk activity or special event is practical.
- d. Appendix 1 describes and outlines the tools used by Holmes in analysing and evaluating child abuse risks in Institute related activities. Some critical questions include:
 - i. What controls and accountabilities might be useful in managing this risk?
 - ii. What risk management options might need to be considered?
 - iii. What review will be undertaken. Note: Ongoing review is required to

ensure that the risk management strategy that is implemented is effective. Review is also useful for organisational Continuous Improvement purposes.

9. Strategies for Communication and Support

9.1 Holmes uses a variety of communication mechanisms to support its Risk Management Strategy. This includes but is not limited to:

- a. Multiple access points for the staff and students and to seek appropriate support and assistance, including via Holmes' Complaints and Appeals processes.
- b. Student Orientation
- c. Telephone calls, email and SMS texts to students and hosts
- d. Email contact with students
- e. Training and Information sessions

9.2 Staff needing additional support can seek assistance from their Managers or the Campus Director.

10. Evaluation

10.1 A review of the efficacy of this Risk Management Strategy and Controls as identified in the Risk Assessment Matrix will be undertaken annually by the Risk Committee.

Version Control and accountable officers

It is the joint responsibility of the Implementation Officer and Responsible Officer to ensure compliance with this Strategy.

Responsible Officer	CEO		
Implementation Officers	U18 Welfare Director/All staff		
Review Date	September 2023		
Approved by			
Governing Council			
Associated Documents			
Critical Incidents Policy Complaints and Appeals Policy Child Safety Policy - Higher Education Child Safety Code of Conduct – Higher Education Privacy Policy			
Version	Brief Description of the changes	Date Approved	Effective Date
1	New Policy	21/10/2022	21/10/2022

Appendix 1: Risk description (*likelihood, consequence and level*)

Likelihood	Risk level				
Almost certain	Medium	High	High	Extreme	Extreme
Likely	Medium	Medium	High	Extreme	Extreme
Possible	Low	Medium	High	High	Extreme
Unlikely	Low	Low	Medium	Medium	High
Rare	Low	Low	Medium	Medium	High
Consequence	Insignificant	Minor	Moderate	Major	Catastrophic

Risk Event or Environment	Existing risk management strategies/ controls	Likelihood	Consequence	Current risk level	New risk management strategies or treatments	Who is responsible?	Target risk rating
Under-developed organisational culture of child safety	<ul style="list-style-type: none"> Child safety Policy and code of conduct policy outlining commitment and associated policies and procedures in place Clear strategies developed to embed culture of child safety e.g. frequent and visible messaging Clear risk controls Training of staff, students, third party providers on Holmes Child Safe Policies and Procedures. 	Possible	Moderate	High	<ul style="list-style-type: none"> Development and implementation of a Risk Management Strategy to embed a culture of child safety and to better support efficacious, ongoing monitoring and review by management. Annual Review by SMG in assessing the effectiveness of strategies towards embedding organizational culture of child safety Refresher training for all staff Revision of Child Welfare check standards HR practices 	<ul style="list-style-type: none"> U18 Welfare Director Campus Directors U18 Welfare Coordinator Program Managers & Teachers Compliance Team 	Low
Lack of monitoring & evaluation of Risk Controls	<ul style="list-style-type: none"> U18 Welfare Director Child Safe Report as presented to Risk Committee 	Unlikely	Major	Medium	<ul style="list-style-type: none"> Annual Review by Risk Committee in assessing the efficacy of the implementation of risk controls 	<ul style="list-style-type: none"> Risk Committee CEO 	Low
Poor awareness and compliance with child safety laws	<ul style="list-style-type: none"> Clear U18 management practices and operational forms e.g for reporting purposes Ongoing training 	Unlikely	Major	Medium	<ul style="list-style-type: none"> Refresher training for all staff Implementation of reviewed U18 Management practices to enhance opportunities for the identification, mitigation & management of child abuse risk. 	<ul style="list-style-type: none"> U18 Welfare Director Campus Directors 	Low
Recruitment of an inappropriate person	WWCC checks or Victorian Institute of Teaching registration	Unlikely	Major	Low	Processes updated to require: <ul style="list-style-type: none"> Criminal history search Pre-employment reference check includes asking about child safety 	<ul style="list-style-type: none"> Campus Directors HR Director 	Low
Engagement with children online	Child safety code of conduct Strategies developed to embed culture of child safety	Possible	Moderate	Medium	<ul style="list-style-type: none"> Training/ Information for students and staff to detect inappropriate behaviour Ensure appropriate firewalls on campus for inappropriate websites 	<ul style="list-style-type: none"> U18 Welfare Director Campus Directors IT Manager 	Low
Unknown people on the premises (e.g. maintenance) or at excursions and camps	<ul style="list-style-type: none"> Clear strategies developed to embed culture of child safety e.g. frequent and visible messaging. Child safe environments 	Unlikely	Moderate	Medium	<ul style="list-style-type: none"> Ensure Code and strategies apply in all school/ environment contexts 	<ul style="list-style-type: none"> Campus Directors 	Low

	information regarding awareness for visitors, staff, volunteers and contractors						
	<ul style="list-style-type: none">• Adequate monitoring• Clear child safety reporting procedures• Visitor Sign-in procedures						