



Risk Management and the Child Safe Standards

Part 1: Responding to risk

A resource for child-related organisations

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AN INTRODUCTION TO RISK MANAGEMENT



Introduction

Organisations that work with children have a responsibility to keep them safe from harm and abuse. Almost all child-related organisations will deal with some element of risk. This can include financial risk, as well as Work, Health and Safety (WH&S) risks. Organisations also need to be aware of risks that may contribute to the abuse or neglect of children.

Ultimately, child safety should be a shared objective of organisations and the communities they operate in. It cannot occur without effective risk management. This resource describes how you can respond to risk. It complements the Office of the Children's Guardian's (OCG's) 'Risk Management: Identifying Risk' resource. The Child Safe Standards inform both resources, which have been written for anyone in an organisation who has a role in reducing the risk of harm to children. Both parts are supported by further resources from the OCG.

Risk Management: Responding to Risk describes why it's important to manage risk and breaks down the steps needed to mitigate it. It will take you through the process of creating a Child Safe Risk Management Plan and explain why this kind of plan is valuable.

Risk Management: Identifying Risk describes the kinds of risk, including abuse and grooming, and explores different kinds of offenders and motivations for offending. Risk factors must be considered in each individual organisational context and be monitored over time. Types of risk will vary in different organisations. For example, the risks in a sporting organisation will be different from those in a school or youth detention facility. Different types of risks present different types of safety challenges and require different responses.¹

Children are exposed to higher levels of risk when organisations take no action to implement protective strategies. A vital component of an organisation's approach to mitigating and preventing risk is a Child Safe Risk Management Plan (CSRMP), sometimes also known as a Child Safe Risk Management Strategy (CSRMS)². This is different to a Work Health and Safety plan (WH&S) because it isn't about attempting to mitigate risks associated with accidents and omissions, slips, trips and falls.

Instead it looks at how organisations can prevent children being exposed to abuse, including physical, psychological and sexual abuse, ill-treatment and neglect. It's important to remember that, unlike accident prevention, abuse is sometimes deliberately inflicted, as well as being the result of errors being made by unskilled workers or procedures not being followed. Sometimes this is classed as professional misconduct.

Your CSRMP will complement your other child safe policies and procedures, which should include:

- Child Safe Policy (that includes a Statement of Commitment to Child Safety)
- Code of Conduct
- Complaint Management Policy
- Human Resources Policy.

The OCG has resources to support you to develop all these important documents. See our website for links to PDFs, videos and eLearning.

* A note on terminology: A CSRMP is not the same as a Child Safe Action Plan (CSAP), which is a specific plan certain NSW government agencies are required to prepare to encourage co-regulation of the child-related sector.

Risk management and the Child Safe Standards



If risk is not managed well, children can be harmed. If risk is managed well, children and young people can remain safe. Understanding how to reduce the risk of harm is not complex, and this resource explains how it can be done. Managing risk supports a culture of safety that includes communication and reporting, transparency and governance. One way to embed all these things in your organisational culture is by using the Child Safe Standards as a framework.

They cover ten priority areas, and the table below gives examples of how addressing risk will help you achieve the intention of each Standard.

Think of the risk factors in your organisation of the contexts you work in (specific information on how to identify and assess risk is given later in this resource). Once you've established the levels of risk, consult the OCG's Guide to the Child Safe Standards for information on how to mitigate or prevent harm occurring.

Child Safe Standard

Standard 1:

Child safety is embedded in organisational leadership, governance and culture.



How risk management applies to this Standard

Risk management is a tool that leaders of child-related organisations can use to improve their child safe practices. A core component of this Standard states that: 'Risk management strategies focus on preventing, identifying and mitigating risks to children'. Leaders are responsible for ensuring children are safe in their organisations.

If it's not applied

Leaders who do not see the risk management of child abuse as a priority may not encourage a child safe culture where the best interest of children is paramount.

When it's applied

Risks are identified, controlled and responded to. Good organisational culture and governance make it easier for both adults and children to disclose abuse if it occurs. The child safe actions of leaders are mirrored by other staff and children are safe.

Standard 2:

Children participate in decisions that affect them and are taken seriously.



How risk management applies to this Standard

All children are vulnerable to abuse because of their dependence on adults. For the most part, adults are physically stronger than children and have social power. This power imbalance is greater when organisations are:

- very strict and authoritarian
- closed to the outside world with little involvement of families or the community
- hierarchical and ordered where those in authority have significant and sometimes unquestioned power.

If it's not applied

Children are more exposed to abuse because they are not supported to be safe or to notify adults if abuse occurs.

Children who are not empowered are more vulnerable as they can sense their views are not important. They may also feel they will not be listened to if they do disclose abuse. In these cases, children are not safe.

When it's applied

Children and young people identify and perceive risks differently to adults. This is why it's important to seek their views and opinions as part of the risk management process. When the views of children are factored into the creation of risk management plans, the plans are more effective and children are safe.

Child Safe Standard

Standard 3:

Families and communities are informed and involved.



How risk management applies to this Standard

An organisation's risk management strategy is strongest when it includes input from family and community members. An increased understanding by an organisation of the experience and cultures of its stakeholders, as well as a corresponding increased understanding of the organisation by its stakeholders, are themselves protective strategies.

If it's not applied

Organisations that don't involve families and communities are considered 'closed.' Cultural characteristics that arise in closed organisations include:

- secrecy, where information sharing on any level is restricted
- abuse of power, where people exert significant control over the lives and actions of those engaging with the organisation on any level
- prioritisation of discipline, order and conformity over the wellbeing of individual children
- isolation from the outside world, including oversight authorities such as the police and welfare agencies
- failure to deal with complaints and undertake investigations.

When it's applied

Risk management is enhanced when families and communities are involved in organisations. It's a two-way flow. When families have oversight of organisations they can provide feedback to them on what they feel is working well and what isn't. Conversely, organisations should consult with families on what makes their children safe. They should provide codes of conduct so that all community members are aware of what rules the organisation has in place to reduce the risk of harm to children. Organisations can also let family members know if harm is reported so they can engage with their children and establish whether they have been harmed as well.



Child Safe Standard

Standard 4:

Equity is upheld and diverse needs are taken into account.



How risk management applies to this Standard

By supporting equity and diversity, risk management strategies can be tailored towards all the children and young people your organisation interacts with, as well as ensuring their specific needs – and the risks some of these children face – are taken into account.

Some children with disability need help with personal or medical care. This relative intimacy may create a risk of abuse within an organisational setting and the likelihood of detection may be reduced if a child does not understand what is appropriate.

If it's not applied

Children with intellectual disabilities, limited verbal communication or behaviour disorders are at a higher risk of all forms of abuse. This is because they are often deliberately targeted for abuse by perpetrators who know it will be harder for children to identify and name them.

Children who require support with personal care are also vulnerable. Sometimes this assistance is provided in private. If risk management strategies are not put in place to support children in these situations, they are less likely to be safe.

When it's applied

When equity and diversity is supported, vulnerable children will be safer because their needs are more likely to be met. This means they can recognise abuse if it occurs, be given strategies to avoid it and know how to report it if it occurs. This applies to a range of children who may have intellectual and physical disabilities, who are from different cultural backgrounds and heritages, to those who are very young, who live remotely, or who have a history of trauma. Children should feel culturally safe and that their family heritage is respected and supported.

Standard 5:

People working with children are suitable and supported.



How risk management applies to this Standard

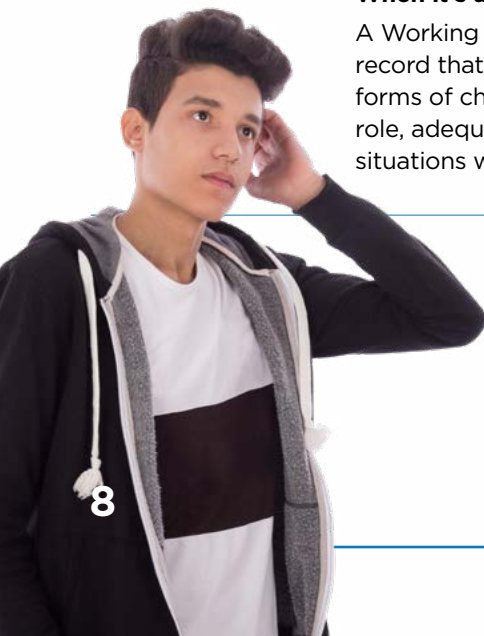
An effective recruitment policy is vital for employing staff and volunteers to work with children. This ensures the risk of unsuitable adults having access to children is reduced. Once in the role, adults should be supervised and monitored when working with children.

If it's not applied

The Royal Commission into Institutional Responses to Child Sexual Abuse found many instances where inappropriate staff had been hired by organisations. These people had then gone on to harm children. Some of these adults may have subsequently been identified had they been effectively supervised and monitored. In environments where robust recruitment is prioritised, children are safer.

When it's applied

A Working with Children Check is a screening tool that identifies those adults who have a record that indicates they may be a risk of harm to children. Beyond this, however, are other forms of checking, such as National Criminal History checks and reference checks. Once in the role, adequate supervision and monitoring helps ensure adults are not alone with children in situations where they can abuse them. In these cases, children are safer.



Child Safe Standard

Standard 6:

Processes to respond to complaints of child abuse are child focused.



How risk management applies to this Standard

Having robust reporting processes increases the likelihood that children and young people will report abuse. When potential perpetrators realise there is more chance they will be identified they may feel less inclined to commit abuse – or to seek work in that organisation.

All children and young people need to be supported to understand their rights and what opportunities exist for them to report abuse.

If it's not applied

Some children, because of a perceived impact on their chances of success may be reluctant to reveal abuse and will need additional support. For example, young people who are gifted musicians or athletes may be very dependent upon their teachers and coaches. In some cases, the financial stability of their family may even be reliant on the perpetrator. Sometimes priests and ministers hold power over children and young people, as well as the other adults in oversight roles. They can exploit their positions to avoid scrutiny and reduce the repercussions for their actions. Organisations where children do not have access to a trusted adult carry a higher risk of child abuse because they may feel they have no one to disclose abuse to when it occurs.

When it's applied

Organisations that are truly safe and nurturing environments for children will prioritise child safety above their own reputations. They:

- take action in response to complaints
- don't conceal allegations or adopt an approach of 'damage control'
- prioritise the needs and safety of the child.

Organisations supporting children will seek to hear from all cohorts of children, including children with disability, children in detention or with low self-esteem. If they have faith that reporting processes will be fair and transparent, they are more likely to raise concerns.

Standard 7:

Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training.



How risk management applies to this Standard

The practice of continually upskilling staff encourages a better understanding of risk and what is required to reduce the chances of abuse and harm occurring. Staff should be trained and supported to understand and apply the organisation's child safe policies and Code of Conduct.

If it's not applied

Staff and volunteers who can't recognise signs of abuse, or don't know how to respond to it, risk exposing children to ongoing harm. This 'bystander' culture can also reduce the likelihood that children will speak up about safety concerns or be believed if they do.

When it's applied

Staff and leaders should have a high level of understanding of the strategies adopted by perpetrators when accessing and abusing children. When this happens they can recognise how and where abuse is occurring so they are better able to prevent it or report it.

Child Safe Standard

Standard 8:

Physical and online environments minimise the opportunity for abuse to occur.



How risk management applies to this Standard

Risk Management strategies must be put in place to ensure children are safe in both physical and online environments. Organisations should attempt to ensure all their physical spaces where interactions with children occur can be observed by other adults.

If it's not applied

Children can be more at risk where interactions occur off-site as there are increased opportunities for adults to be alone with children – including online. If specific harm prevention measures are not put in place children are more at risk, especially in cases where a child is dependent on an adult for success which can present opportunities for professional boundaries to be crossed.

When it's applied

Organisations can conduct site audits. There should be codes of conduct which describe any situations that permit adults to be alone with children. They should say which areas are out of bounds for children. Adults should be supervised to reduce their opportunity to form relationships that can involve physical contact and inappropriate emotional closeness.

Standard 9:

Implementation of the Child Safe Standards is continuously reviewed and improved.



How risk management applies to this Standard

The Royal Commission Into Institutional Responses to Child Sexual Abuse heard from 8,000 survivors of abuse aged between 7-93 years old. It identified over 4,000 organisations. It found that it takes an average of 23.9 years for a survivor to disclose that abuse has occurred.

As a result of its research the Royal Commission developed the Child Safe Standards to articulate the essential components of a child safe organisation.

If it's not applied

If organisations rely on outdated or ineffective strategies children are more likely to be harmed and abused. If the Standards aren't used as a framework, there is less opportunity for continual improvement of all key factors that keep children safe.

When it's applied

The Child Safe Standards should guide what organisations need to do to be child safe. They do this by establishing what is best practice and setting benchmarks by which they can chart their progress. They regularly review their risk management strategies and high risk activities as a way of proactively addressing risk. As seen in this table, Risk Management is an element of all the Standards.

Child Safe Standard

Standard 10:

Policies and procedures document how the organisation is child safe.



How risk management applies to this Standard

Effective policies and procedures describe how and when Risk Management tasks are conducted. This helps ensure they are robust, applied and fit for purpose. Organisations where child safety is not seen as a priority may be targeted by those seeking to harm children. One way to prevent this happening is by having an organisational culture where working with policies and procedures in mind is second nature. In these environments, risk is minimised and proactively addressed.

Child Safe Policies and codes of conduct should be reviewed annually and after critical incidents. As your organisation grows and its systems and processes change you should also revisit your risk management strategy to ensure it reflects all the services you offer and the potential risks to children they carry.

If it's not applied

Organisations are more vulnerable to abuse occurring when expectations about adult and child relationships are not articulated in, for example, a Code of Conduct. In these cases staff are not held accountable to standards of behaviour. In many organisations where staff are close or have known each other for a long time, it can be difficult to question long-standing co-workers if grooming or abuse is suspected. Missing or ineffective child safe policies and procedures can increase opportunities for perpetrators to abuse children because organisations may not have established acceptable child safe practices, clear professional boundaries, and mechanisms for identifying and reporting inappropriate behaviour.

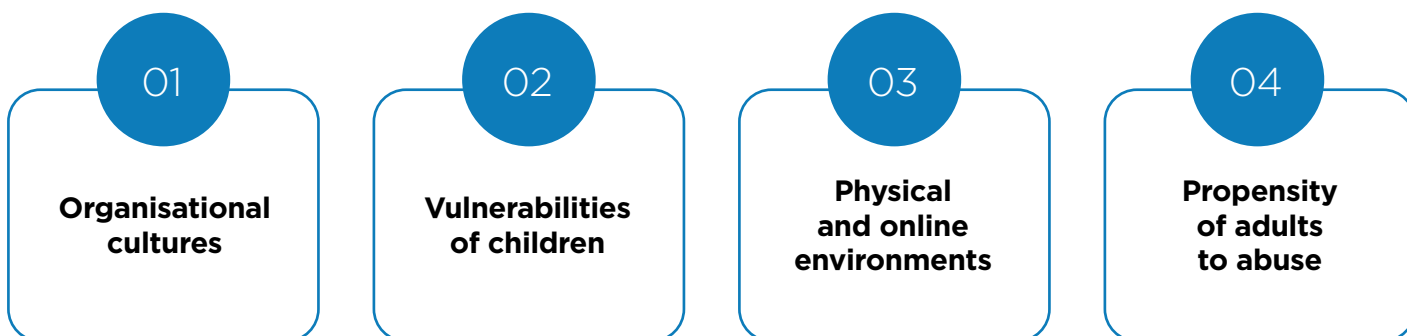
When it's applied

Having codes of conduct which clearly describe what is acceptable and what is unacceptable behaviour mean staff and volunteers don't have to make a judgement about whether harm is occurring: They just have to report that a rule has been broken. Where internal procedures are applied consistently to deal with allegations of child abuse, all matters of concern are dealt with in a way that prioritises the best interests of children.



Dimensions of risk

Research suggests that risk of harm to children can be broken down into four categories:



Understanding the different dimensions will help you to develop appropriate responses to them.

Organisational cultures

- Leaders that do not support or prioritise child safety
- Emphasis on power, aggression, strength and competition
- Lack of understanding or awareness of child abuse
- Protection of reputation of the organisation
- Unclear expectations about staff-child relationships
- Culture of not listening to and respecting children
- Close-knit and longstanding relationships between co-workers
- Children not having access to a trusted adult
- Ineffective child safe policies and procedures
- Inadequate internal disciplinary processes.

Factors that resemble those found in 'total' or 'closed' institutions.

Cultural factors, including leadership and organisational culture, can shape attitudes, beliefs and practice. These influence how individuals behave when interacting with children, what is understood to be appropriate and inappropriate behaviour, and how children's safety is prioritised. Leadership and culture also influence how organisations operate and makes decisions to prioritise children.

Dimension**Kinds of risk****Vulnerabilities of children**

- Age of children
- Children with physical disability or intellectual disability
- Children and young people with pressures to remain silent
- Children with prior maltreatment
- Children in out-of-home care or challenging home environments
- Children from different cultures.

All children are vulnerable, but some carry additional vulnerabilities which can mean they are targeted or more likely to experience abuse. By identifying the factors that increase a child's vulnerability to abuse, organisations can better understand why some children are more likely to be targeted for abuse than others, and the factors that may prevent them from disclosing abuse.

Physical and online environments

- Opportunities to be alone with children and young people
- Opportunities to form relationships that could involve physical contact and/or emotional closeness.

Both the physical and online environment can allow perpetrators to access children. They can provide opportunities for grooming to occur. This can progress past seemingly 'innocent' behaviour (which by itself may not be harmful) and lead to abuse. Additionally, opportunities for adults and children to form relationships that could involve physical contact or emotional closeness can create opportunities for adults to cross acceptable professional boundaries.

Defining what is unacceptable behaviour in organisations can be a challenging exercise. Having a trusted, genuine and caring adult in a child's life can contribute to their feeling of being safe. Adult and child relationships therefore need to set out clear behavioural expectations in a way that does not negatively impact on a child's feeling of safety or their interactions with trusted adults.³

Propensity of adults to abuse

- Staffing profile – men sexually abuse children and young people more often than women, however women are more likely to physically assault or neglect children compared to men.
- Living arrangements – residential settings allow more opportunities for abusers to be alone with children

'The relatively small proportion of men who sexually abuse children ought not to cast a shadow over the great majority of non-abusive men who work with children and young people, and who make a significant and beneficial contribution to children's lives. It does mean that institutions and organisations with mostly male staff, and which have a higher vulnerability risk or situational risk profiles, need to give particular attention to strategies that will moderate that risk.'⁴



More information on using this model of risk in order to prevent harm is found in Risk Management: Identifying Risk

Risk management for boards and leaders

Organisational culture and governance drives the way organisations operate and how issues are responded to. Leaders play a critical role in ensuring that children’s rights, their best interests and safety are prioritised. Organisations demonstrate their commitment to child safety by managing risks that either contribute to child abuse (sexual, physical and emotional), neglect and ill-treatment, or poor responses to abuse.

Boards of directors are an important part of many organisations. As leaders, board members play a pivotal role in creating and maintaining a child safe culture and ensuring their organisation identifies, manages and reduces risks to children. Leaders can include those

appointed to management and CEO positions, as well as councillors and other elected representatives.

Legislative obligations on boards and leaders

Boards and leaders sometimes choose to focus on financial risks, however non-financial risks can have significant impacts on organisations and sometimes catastrophic outcomes for the children in their care. Boards and leaders of organisations need to know the obligations that apply to them in relation to child safety.

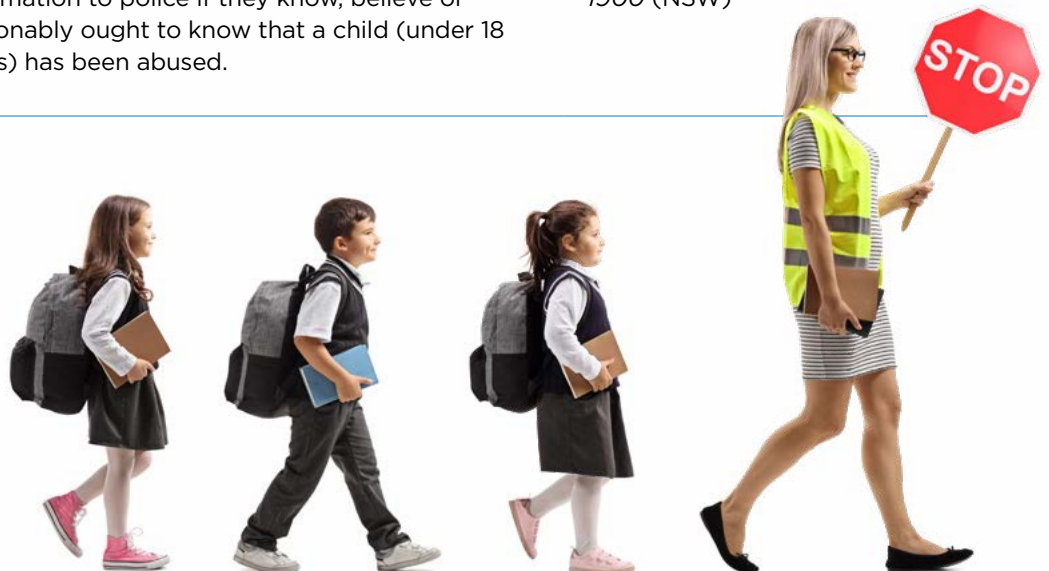
Obligation	Overview	Legislation
Legislated Child Safe Scheme	<p>In November 2021 the NSW government passed legislation to give effect to the Royal Commission into Institutional Responses to Child Sexual Abuse recommended regulatory scheme. This is known as the Child Safe Scheme.</p> <p>The scheme requires many child-related organisations to follow the recommendations of the Royal Commission and implement the Child Safe Standards.</p>	Children’s Guardian Act 2019 Amendment (Child Safe Scheme) 2021
Responsibilities of organisation heads under the Reportable Conduct Scheme	<p>The head of an organisation that is covered by the Reportable Conduct Scheme^{* 5} is described as the ‘Head of a Relevant Entity’. HREs are responsible for the entity’s compliance with its legislative obligations under the scheme.</p> <p>Obligations include:</p> <ul style="list-style-type: none"> ■ notifying the Children’s Guardian if they become aware of a reportable allegation or a reportable conviction.⁶ ■ ensuring their entity has systems, policies and processes in place for preventing, responding and reporting reportable conduct (child abuse) – including the capacity to conduct robust investigations. 	Sections 29 and 54 of the <i>Children’s Guardian Act 2019</i> (NSW)



* In some smaller organisations with a flat management structure, a board member such as the President may assume the responsibilities of the HRE. The important thing is that someone is appointed to that role, and that the organisation’s stakeholders know who that person is.

Obligation	Overview	Legislation
Duty of care	<p>Organisations have a duty to prevent child abuse from occurring.</p> <p>NSW law imposes a statutory duty on organisations that exercise care, supervision or authority over children to prevent child abuse perpetrated by individuals associated with the organisation. The onus of proof is on the organisation which must establish that it took reasonable precautions to prevent abuse occurring.</p> <p>This could include ensuring that it implements proper systems and processes to prevent, detect and respond to abuse.</p>	Division 2 of the <i>Civil Liability Act 2001</i> (NSW)
Failure to protect offence	<p>An adult working in an organisation doing child-related work will commit an offence if they know another adult working there is at serious risk of abusing a child (under 18 years) and (if they have the power to do so) fail to reduce or remove the risk through negligence.</p> <p>An organisation doing child-related work includes, but is not limited to:</p> <ul style="list-style-type: none"> ■ sporting clubs ■ childcare services ■ education services ■ residential care services. 	Section 43B of the <i>Crimes Act 1900</i> (NSW)
Failure to report offence	<p>All adults in NSW are required to report information to police if they know, believe or reasonably ought to know that a child (under 18 years) has been abused.</p>	Section 316A of the <i>Crimes Act 1900</i> (NSW)

Child safe cultures develop over time. They need consistent focus, effort and action by leaders, employees and volunteers. The core values that underpin and inform the organisation's approach to child safety should be documented in a Statement of Commitment to Child Safety.⁷



Boards and leaders – how you can champion child safety

The following values should be at the heart of any approach that prioritises children's safety:

- child abuse is not tolerated and must not happen
- the best interests of children and their protection from harm is paramount
- children's rights are understood and respected
- concerns about child safety raised by children and young people and their parents and carers are treated seriously and acted on
- reporting instances of abuse must not be obstructed or prevented.

These attitudes and behaviours can be reflected in the actions of leaders including:

- the matters they give the most attention to
- the decisions they make and what issues are given priority
- the people hired to work in child-related roles
- what behaviour is rewarded or prohibited
- how allegations are responded to.

While safety of children is the paramount consideration, high level organisational risk registers should factor in potential legal, financial (including insurance) and reputational outcomes resulting from children being harmed.



A practical understanding of risk management

Risk management in a child safe context is the process of managing your organisation's exposure to poor professional practice or misconduct by staff and volunteers which may be intentional or unintentional. All organisations, big and small, operate in uncertain and changing environments. In the case of child-related organisations, risks to children comprise accidents and deliberate or unintentional harm by adults or other children. Risk of accidents should be addressed by your Work, Health and Safety Policy. While this guide discusses other kinds of harm children and young people can be exposed to it should be noted that in some cases physical injuries are the result of deliberate neglect. While they could be seen as WH&S issues, they should also be assessed as instances of potential abuse.

Risk in this context is defined as unwanted consequences – the opposite of your organisation's desire to care for children.

Controls are any actions taken to manage the impact of risk.



Risk identification and management

1. Identify risks to child safety – consider the physical and online environment, the behaviour and interactions between adults and children, the culture of your organisation and the vulnerabilities of children
2. Identify risk level (low, medium, high)
3. Identify the most relevant Child Safe Standard or Standards to help consider how the risk can be managed – consult the *Guide to the Child Safe Standards*
4. Outline what you will do to mitigate or manage the risk – Interventions do not need to be expensive and many can be implemented with no or limited cost
5. Identify who is responsible for implementing the strategies, interventions and changes
6. Identify the timeframe for when changes need to be implemented by
7. Identify what you expect to see after implementing the Child Safe Standards and your CSRMP
8. Review your approach to implementing the Child Safe Standards yearly. You should also regularly monitor all the risks you face and controls you have put in place to ensure the controls remain fit for purpose.

Our resource Risk Management: Identifying Risks explores this approach to risk management in detail.

It should be noted that some children are more vulnerable to abuse and harm. They face additional risk factors which must be considered and monitored in your organisational context.

Governance risks, such as those relating to finance and legal outcomes, should be evaluated in conjunction with those which could result in child harm, however they should not be considered as being more important. The safety of children is the paramount consideration.

There is no level of insurance or legal protection that makes the risk of abuse to children acceptable.

Elements of effective risk management

**Consistency:**

promoting transparency and applying a consistent risk framework across the entire organisation

**Flexibility:**

ensuring a variety of approaches when identifying, responding to and controlling risk to accommodate the various range of activities across the organisation

**Accountability:**

reinforcing risk accountability in all levels of staff and modelling an understanding that keeping children and young people safe is everyone's responsibility

**Embedded risk culture:**

risk management is embedded in the culture, strategies, plans, decisions, operations, recruitment and business processes of the organisation

**Review and monitoring:**

regular monitoring, review and reporting of risks is undertaken

**Education and awareness:**

education and training drive an awareness of a positive attitude to risk management⁸

**Reflective questions:**

1. Do you have a Child Safe Risk Management Plan (CSRMP)?
2. Who is responsible for your CSRMP?
3. How do you consult with children and young people when creating or reviewing your CSRMP?
4. What have you done to identify risk in your organisation?
5. How do you consider and demonstrate the Child Safe Standards through your risk management planning?

What is risk management in a child-related organisation?

Risk management:

- Reduces the likelihood of children being harmed
- Means fewer children will have to live with the effects of abuse
- Makes it more difficult for offenders to operate in your organisation through the fear of being caught
- Gives the staff and volunteers of your organisation confidence to work with children in a structured, safe way
- Approaches risk in a structured pre-emptive way, and not in a responsive way (after the harm is done)
- Underpins the organisation's development of policies, procedures and codes of conduct.

Risk management is not:

- About protecting the reputation of your organisation or its exposure to legal action and potential financial loss – although this is a potential benefit, of course
- Something introduced by leaders intent on 'micromanaging'
- About preventing adults in child-related employment offering meaningful experiences to the children and young people they care for
- About having too many rules and discouraging adults to work with children
- An expensive plan sitting on a shelf that is never used.⁹



Prevalence of abuse

Not all abuse occurs in organisations. Nor is it all perpetuated by adults. Child-on-child abuse and abuse in the home forms many of the reports received by child protection agencies in Australia daily. In an organisational context application of the Child Safe Standards will reduce the risk of abuse faced by children. When reporting abuse, different agencies have different thresholds and standards. These are described in detail in the OCG's Complaint Management resource.

Child abuse in Australia



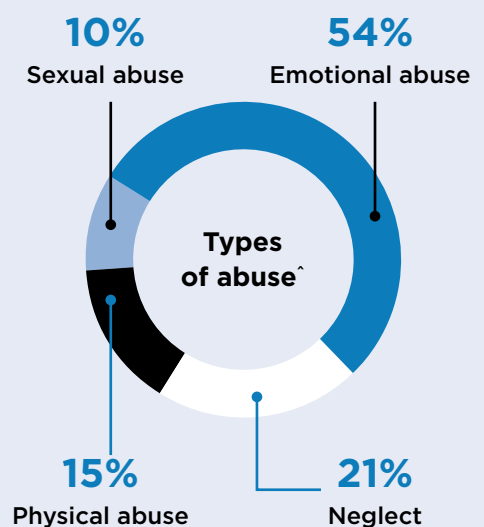
451,000
reports
in 2018/19[#]



In Australia
1 in 6 women
and
1 in 10 men
have experienced
sexual or physical
abuse (or both)
before the age of 15^{*}



Infants were most
likely to require
**child
protection
services**,
15-17 year olds were
least likely^{**}



[#] Child protection Australia 2018-19; 16March2020; AIHW p 20

^{*} <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/2016>

^{**} Child protection Australia 2018-19; 16March2020; AIHW p 14

[^] Child protection Australia 2018-19; 16March2020; AIHW p 25

Allegations reported to the OCG¹⁰

The Reportable Conduct Scheme requires relevant entities from both government and non-government sectors to notify us of reportable allegations and reportable convictions against their employees.

Under the Scheme ‘employee’ is defined broadly to include contractors, volunteers and people otherwise engaged by the relevant entity to provide services to children.

Number of notifications received by primary allegation type

Primary allegation	2019-20	2020-21
Assault	630	590
Ill treatment	169	140
Neglect	381	246
Offence under section 43B or 316A of the Crimes Act*	0	4
Behaviour that causes significant emotional or psychological harm	42	36
Reportable conviction	3	2
Sexual misconduct	242	182
Sexual offence	256	340
Not in jurisdiction	253	356
Total	1976	1896

* Failure to reduce or remove risk of child becoming victim of child abuse or concealing child abuse crimes.

Number of notifications received by relevant entity type

Type of relevant entity	2019-20	2020-21
Agency providing substitute residential care to children	24	37
Approved education and care service	179	263
Department of Communities and Justice	491	333
Department of Education	432	422
Designated Agency – non-government	656	604
NSW Health*	26	32
Non-government school	127	126
Public authority	14	17
Religious body	23**	56
TAFE	2	3
Agency not in jurisdiction	2	3
Total	1976	1896

* Includes Ministry of Health, Local Health Districts, statutory health corporations, affiliated health services and Ambulance Service of NSW

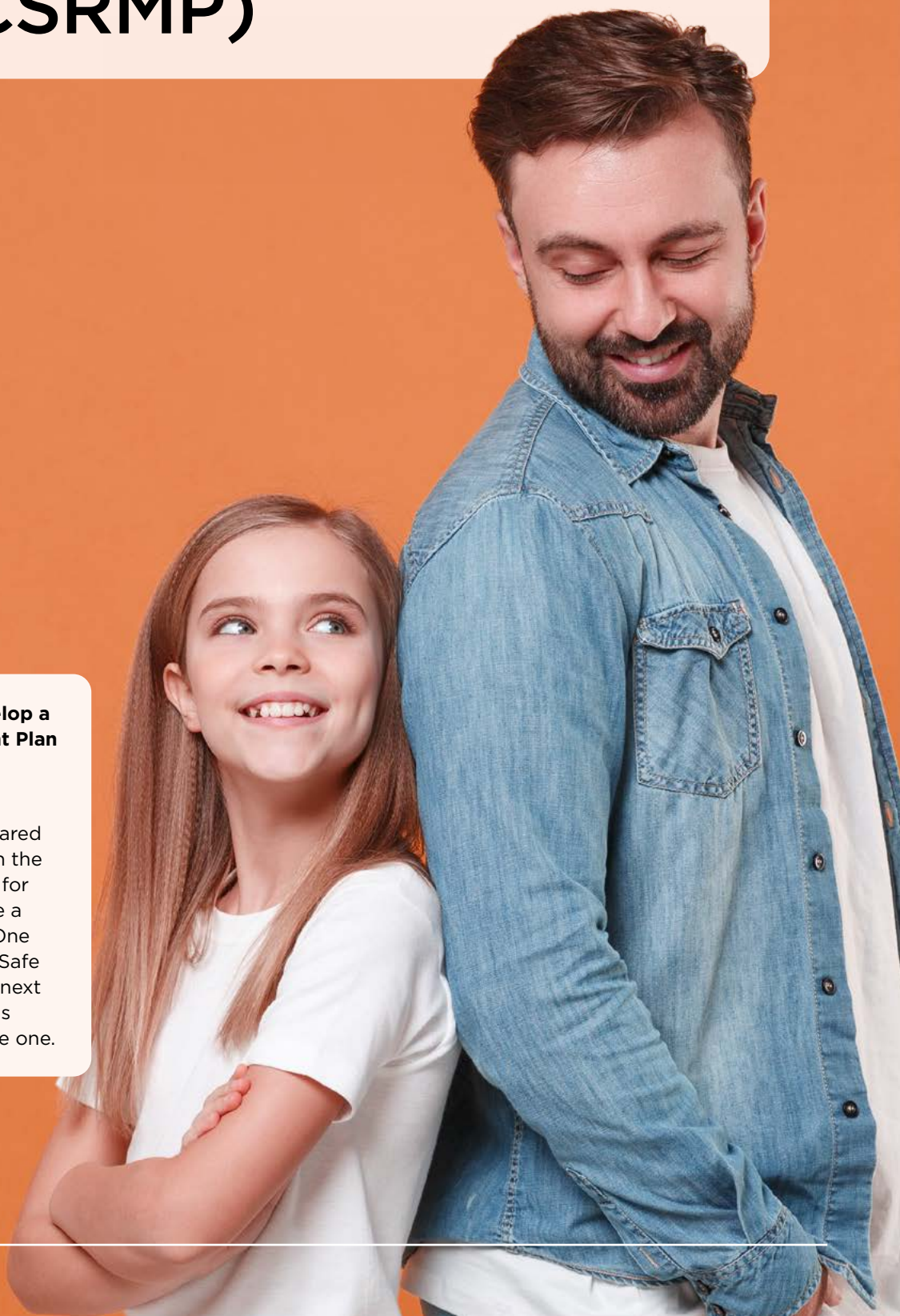
** Only in jurisdiction from 1 March 2020



DEVELOPING A CHILD SAFE RISK MANAGEMENT PLAN (CSRMP)

Understanding how to develop a Child Safe Risk Management Plan (CSRMP)

This section reinforces that keeping children safe is a shared responsibility for all adults in the organisation, and especially for leaders who should promote a culture of valuing children. One way to do this is via a Child Safe Risk Management Plan. The next part of this resource contains information on how to create one.





The information that follows describes what you can do to prevent or lower the risk of risk and harm towards children. Putting strategies and controls in place also provides protection to workers and the organisation from potential allegations of harm. A good CSRMP means children and young people, their families, communities, and the organisation all benefit. For more detail on types of risk, how to identify grooming, and recognising offenders, explore the Risk Management: Identifying Risk resource.

Child safe cultures need consistent focus, effort and action by leaders, employees and volunteers over a sustained period. A Statement of Commitment to Child Safety describes and underpins an organisation's approach to child safety. The following values should be at the heart of any approach that prioritises children's safety:¹¹

- Child abuse is not tolerated and must not happen
- The best interests of the child and their protection from harm is paramount
- Children's rights are understood and respected
- Concerns about child safety raised by children and young people and their parents and carers are treated seriously and acted on
- Reporting instances of abuse must not be obstructed or prevented.

In looking at Standard One of the Child Safe Standards, the Royal Commission noted that risk management was a vital component that should:

- Be developed from a clear, evidence-informed concept of potential intentional and unintentional risks to children in an organisation's specific setting. For sexual abuse, it requires knowing the characteristics of abusers and victims, and how, when and where abuse tends to occur
- Have a prevention focus that addresses child safety
- Have appropriate controls to eliminate or mitigate identified risks
- Consider any increased risk with specific activities, and particularly vulnerable children, but does not discourage positive relationships between adults and children, and healthy child development.¹²



First steps

There are a number of steps you'll need to take to create a robust risk management plan:

- Establishing the settings you operate in
- Thoroughly exploring all the potential risks of harm that exist in these settings
- Creating a Child Safe Risk Management Plan which aims to remove these risks, or in cases where they can't be removed, reduce the chances of them occurring as much as possible. Part of this process involves recording your findings
- Implementing mitigation strategies and reviewing their effectiveness.

When considering the four precursors of risk that have been discussed already in this document (situational, vulnerability, propensity and organisational) it is important to remember that changing the first three is dependent on many external factors, and may be impossible. An organisation's greatest chance to reduce the risk of harm to children therefore comes by changing its organisational culture.

A risk management plan is a way to describe risk and what methods you will use to reduce or remove it.

Planning pathway

- Identify the benefits and challenges of implementing a risk management plan
- Gain the support and commitment of your leadership team
- Establish a group to manage and coordinate risk management
- Develop a plan to guide the project so that oversight of risks and their controls are assigned to roles within the organisation
- Communicate the plan to your stakeholders
- Investigate your environment, identify your options and design the risk management plan
- Document the strategy
- Implement the strategy
- Monitor and regularly review the strategy.¹³

A step-by-step approach to assessing risk

A risk matrix is a simple way to assess risk. They're well recognised and used in many places. You may have seen them as part of a Work Health and Safety plan. They typically comprise two axes which gauge likelihood and consequence. It asks the person assessing the risk to consider:

- Likelihood: How likely is it that this harm would occur?
- Consequence: What would be the consequences if this were to occur?

In gauging the risk of harm to children, *likelihood* of risk carries a greater importance than in some other risk assessment settings. This is because most people recognise that a single instance of abuse could be rated in the highest category of consequence. This is why even events which are considered highly unlikely should be included in your risk management plan.

The likelihood of a particular harm occurring will vary depending on the organisation. A risk rated as 'Likely' to occur at an early education and childcare centre might only be rated 'Possible' at a sports club. This is why your organisation needs to tailor its risk management approach. It cannot simply copy and paste from another place. It must consider all its settings and the risks associated with them.

In other settings, things like reputational and financial risk may be part of the overall risk assessment hierarchy. It is becoming more apparent that harm to children also carries a financial and reputational risk.

Organisations that value children, however, will prioritise risks to them over any risk to the organisation, as they recognise that preventing children from being harmed will also address these other kinds of organisational risks. Harm to children should also be seen as the paramount consideration.

Potential responses to risk

1. **Risk avoidance:** An organisation may consider not running a particular activity because it feels the risk may be too high. Children are disadvantaged because that activity isn't running.
2. **Risk financing:** An organisation decides it will address harm if it arises by being prepared to cover any financial payouts or ignoring damage to its reputation. Result: Children are at risk of harm.
3. **Risk transfer:** An organisation transfers the operation of programs and activities to third party providers, without oversight. Result: Children are at risk of harm.
4. **Risk control:** An organisation implements robust and effective risk mitigation strategies. Result: Children are protected from harm and able to participate in activities and programs that support their physical and emotional growth.¹⁴



Some commonly used terms:

- **Risk control:** also known as treatment or a protective strategy. It's what you can do to reduce or eliminate a risk
- **Risk level:** some risks are more likely to occur than others. Can also be referred to as a risk hierarchy.
- **Risk assessment:** your assessment of a risk in terms of both its likelihood, and potential consequence. May also be known as a risk rating.



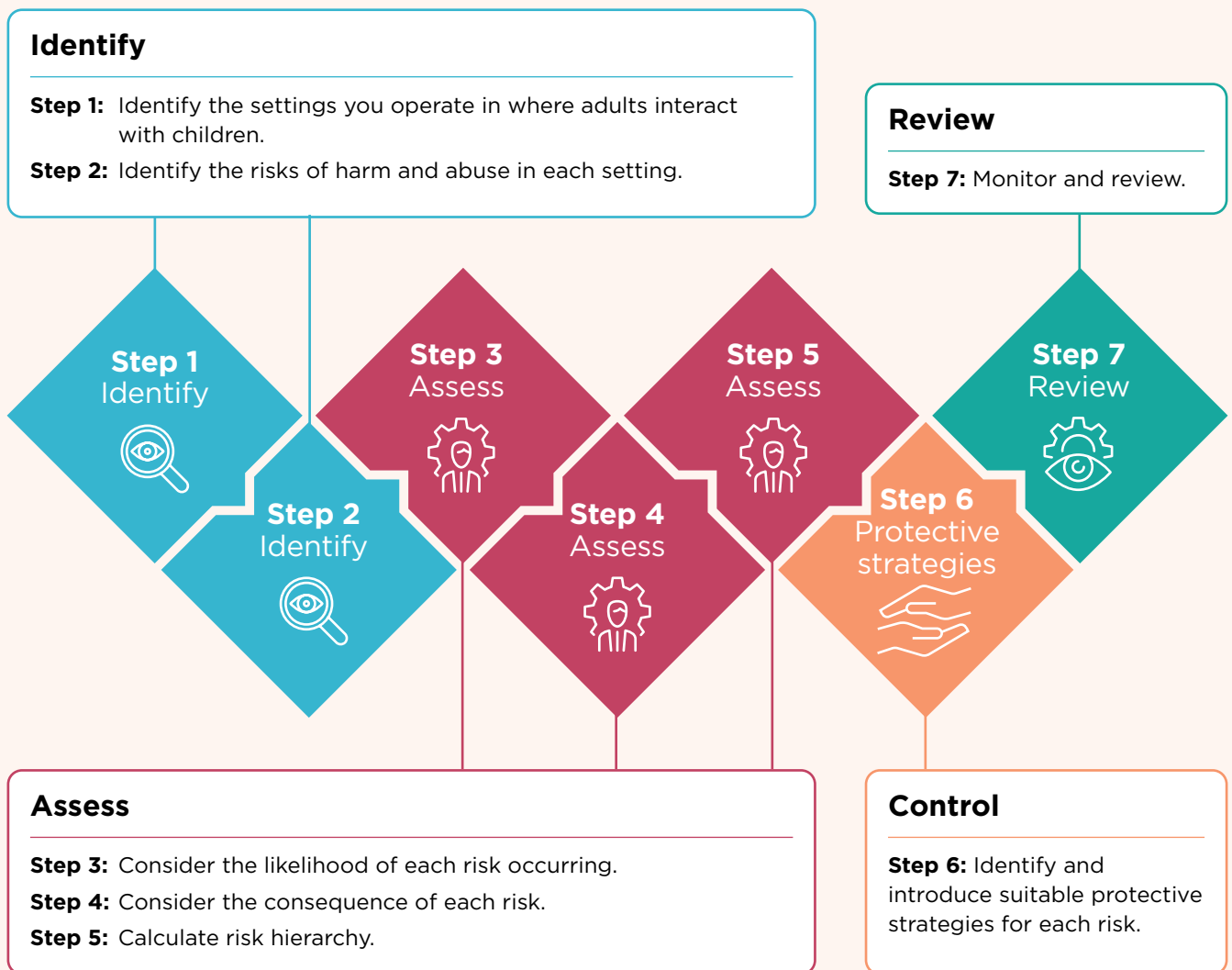
Seven steps to an effective CSRMP

Risk managing for the safety of children is not unlike any standard risk management approach:

- Identify risks
- Assess risks
- Apply controls or treatments
- Review those controls and treatments.

To break down these four elements even further, within this approach there are seven steps to creating a CSRMP.

Seven steps to creating a CSRMP





Step 1 - Identifying the settings you operate in

Think of the different settings in your organisation where adults work or interact with children. In terms of the physical environment you should include buildings, classrooms, sporting fields, recreational activities, overnight camps, swimming pools, studios, vehicles or anywhere else.

You should also consider what online platforms you use. These should include text and messaging opportunities, games, websites, Facebook, SnapChat or any other kinds of social media, as well as video conferencing platforms such as Zoom or Skype.





Step 2 - Identifying risk in each setting

Once you've compiled a comprehensive list of all the physical and online spaces you operate in, you need to think about the risks that exist in those spaces. You should include even worst case scenarios (if you don't identify them, you can't prevent them from happening). This is unlikely to be a job for one person, and you should give thought to establishing a committee to share the load. You should find out whether any of your committee members have previous experience with identifying risk and use what they've learned when doing it. You can also draw on children and community members. You should look at the risk management plans of other organisations to see what they have identified to attempt to ensure you have covered all possible scenarios. If your organisation is well resourced, you may want to employ an external professional to assist you. You should always consult with the children and young people who attend your organisation.

You should think of potential opportunities for grooming and the different kinds of harm that can occur. These are outlined in more detail in the Risk Management: Identifying Risk resource but include:

- Psychological abuse
- Neglect
- Physical abuse
- Sexual abuse
- Grooming.

For example

LazyDayz Child Care looks after babies and young children who are still in nappies. The nappy changing room was identified as one of the places the organisation considers a 'setting' in terms of its risk management assessment. The table below identifies the risks in that setting and how the harm can occur.

Risk setting (name of area)

Nappy changing area

Brief description of setting (where is the area and what occurs there)

The nappy changing areas, toilets and personal care areas located off the main activity areas. They are separated by a heavy wooden door which is usually closed to provide privacy.

Risk title and description (define the risk)

Risk title

Inappropriate touching of a child.

Risk short description:

Children are at risk of sexual abuse during times of personal intimate care because they rely on the assistance of the adult to perform this task.

Describe the risk (including causes and consequences)

- Where an adult is out of the line of sight of others the possibility of abuse occurring is increased as the likelihood of the abuse being detected is reduced
- Children may be unable to verbalise the harm due to their age or because of disability.

Risk title

Inappropriate photographs of a child.

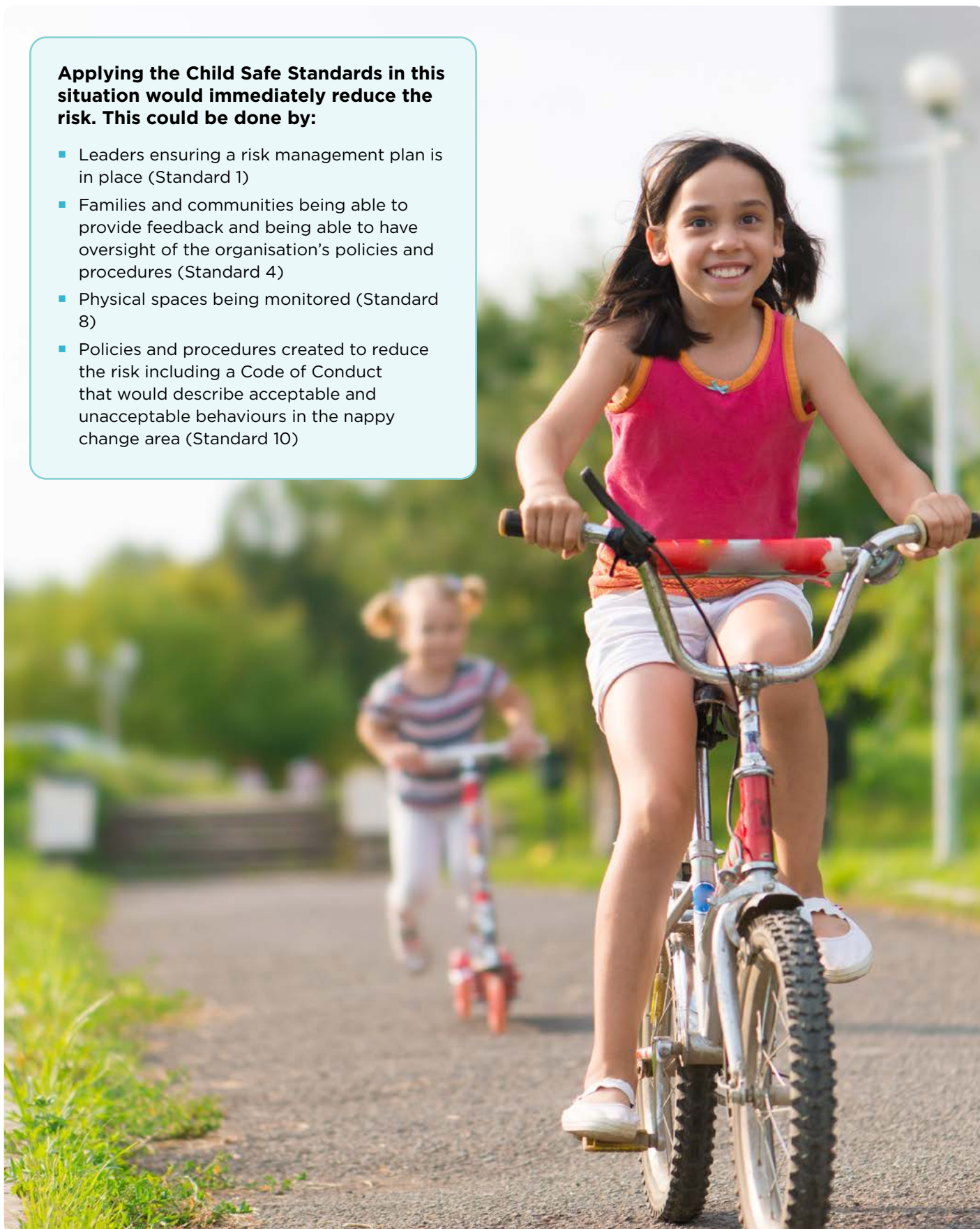
Risk short description:

Children are at risk of being photographed without clothes on, in provocative poses or while being abused.

- Codes of conduct fail to describe the situations where adults should not be alone with children
- They should also specify in which areas adults can have phones with them, and where they cannot
- Doors should not be closed, or have small windows inserted in them to increase the possibility of natural surveillance.

Applying the Child Safe Standards in this situation would immediately reduce the risk. This could be done by:

- Leaders ensuring a risk management plan is in place (Standard 1)
- Families and communities being able to provide feedback and being able to have oversight of the organisation's policies and procedures (Standard 4)
- Physical spaces being monitored (Standard 8)
- Policies and procedures created to reduce the risk including a Code of Conduct that would describe acceptable and unacceptable behaviours in the nappy change area (Standard 10)



Matters of high risk

Your child safe policy should also address some of the risks that have been identified in your risk management plan. When we talk about addressing the risk, we mean how we can reduce the likelihood of the abuse from occurring. The likelihood of child abuse and harm occurring is defined under the following 4 dimensions:

- **Organisational risk** – this relates to the characteristics of an institution. Does your organisation value children? Is there a hierarchical structure that means children's safety is not valued? Does the organisation value their reputation over the safety of children?
- **Vulnerability risk** – this relates to the vulnerability of the child. Is the child able to communicate? Has the child been subjected to previous trauma?
- **Situational risk** – does the environment increase or decrease the likelihood of harm occurring? Are children supervised in online environments? Can the physical environment be altered to minimise the risk of harm from occurring?
- **Propensity risk** – this relates to the people who work with children. Are they appropriately skilled? Are they supervised sufficiently? Do they comply with policies and codes?

All organisations will have an element of risk that a child will be abused and there will be some activities that will be higher risk. For example, we know that most abuse occurs when a child is alone with an adult or where the adult has a disproportionate level of authority over the child.

This can be because of a lack of oversight from other adults (situational) or it could be due to a power imbalance between the adult and child (propensity), it could also be because adults in the organisation are seen as more important than children (institutional). Your child safe policy should address matters of high risk by guiding the behaviour of adults around specific activities.

Defining matters of high risk will vary in organisations and should be based on the services you provide. Later in this section there are examples of situations that we know pose a higher risk of harm to children.





Step 3 - Calculating the likelihood

When categorising the likelihood of the risk occurring you can use the following scale:

Rating	Application of the Standards	Description
Low	The Child Safe Standards are applied throughout the organisations and are regularly reviewed.	There are enough protective strategies to prevent this kind of harm from happening.
Medium	Some Standards are applied, but not all, and they are not regularly updated.	Harm could occur – there are protective strategies in place but it is not entirely eliminated.
High	Old systems and procedures are in place, however not all are used. The Child Safe Standards aren't applied.	Harm is likely to occur despite some protective strategies.
Very high	No Standards or Child Safe Policies are applied. The organisation is hierarchical and 'closed'. Other risk factors are present.	Protective strategies aren't in place to reduce harm.





Step 4 - Assessing the consequence

While sexual abuse and serious physical assault undeniably fall into the category of 'severe', prolonged psychological abuse and neglect can be just as damaging.

The level of consequence becomes more severe when the likelihood of it recurring is greater. Similarly, the effect of some actions on vulnerable children may be greater than on other children. For example, the consequence of a one-off incident of physical harm on a child with disability might be greater than for a child without disability. This means that when determining the level of consequence your organisation should consider the level of detriment the harm would cause to the child.

Consequence, in terms of risk mitigation in a child-safe context, is perhaps a less important factor than in a WH&S setting, for example. The 'consequence' of an accident could be a graze, a sprain, a break or a death. In other words, there are different grades of consequence. In a child-related setting, however, most people would consider any instance of child sexual abuse as severe, whether a 'one-off' incident or a repeated pattern of abuse. Consequence in this context should therefore be seen as the *potential* for abuse to occur, or be occurring. Risk management should consider consequence as the *potential* for abuse to occur – not necessarily the 'level' of the abuse itself.

Consequence	Effect on the child	Examples
Minor	Causing the child some upset or concern	One-off event of poor behaviour by an adult, such as belittling the child.
Moderate	Causing the child significant distress	Instances of bullying, psychological and emotional harm, physical punishment, neglect.
Major	Ongoing significant distress or harm	Repeated inappropriate behaviour patterns by an adult including grooming, abuse and harm.

All breaches of your organisation's Code of Conduct should be reported.







Step 5 - Calculate the risk

To determine the risk-level, use the left-hand column to plot the likelihood of the risk. Then move across the row and plot the severity of the consequence.

Low			
High			

Using the colour code, the levels of risk are categorised as Low, Medium and High. To have a low level of risk, the event must have a somewhat limited probability and level of severity. Note that a risk with a negligible consequence is usually low risk, but it could become a medium risk if it occurs frequently.

Example

In a sports club setting, the risk management team identified one risk in their club is of a coach becoming frustrated with a young athlete and directing verbal abuse at them. The team first plotted for a one-off incident. They considered the event as 'possible' (that is, has a moderate chance of occurring).

	Minor	Moderate	Major
Low			
Medium		Coach shouting (one-off incident)	
High			

The team notes that the event falls in a yellow box. They consult their risk level chart. They can see that yellow boxes indicate a low risk that can be managed by routine procedures or check lists.










Risk levels

- Low** Risks which may be managed by routine procedures or check lists.
- Medium** Risks which need attention and policy interventions put in place.
- High** Risks which need urgent attention, require further investigation and need significant interventions put in place.



Step 5 - Calculate the risk

The club then used the risk assessment matrix to plot the same event, but if it was repeated often. (If it occurred like this it would be considered psychological abuse.)

	Minor	Moderate	Major
Low			
Medium			
High			 Coach shouting (repeatedly)

Looking at the risk level chart, the event when repeated has now become a major risk as it falls in the red box. This means it needs urgent attention, with interventions put in place to prevent it occurring.





Step 6 - Identify and introduce suitable protective strategies for each risk

Once you've determined the risk levels for each potential event in your organisation, you'll need to establish what you can do to prevent them occurring. If they can't be prevented entirely, you'll need to work out how to reduce the likelihood of them happening. There are many things you can do to prevent harm occurring. The first step is to consult the Child Safe Standards. The Standards provide direction and give you a framework to mitigate risk.

Protective strategies

Type of protective strategies	Examples	Standards applied
Physical barriers	Locks on doors to prevent access to secluded areas; areas where adults and children interact have clear lines of sight.	1, 8 and 10
Rules governing interactions	Adults are not allowed to be alone with children and young people; adults are not allowed to touch children in certain ways.	1, 5, 7 and 10
Rules governing behaviour	Adults are not allowed to contact children and young people on social media; adults are not allowed to shout at children.	1, 5, 7 and 10
Screening processes	You should ensure as much as you can that all adults working with children are suitable to do so. This can happen as part of your recruitment process and by verifying their Working with Children Check.*	5, 7 and 10
Protective behaviours	Children and young people are given protective behaviours skills so they understand they can speak up if they feel upset, sad or angry.	2, 3 and 4
Governance	Leaders model the behaviour they expect from adults. They ensure codes of conduct are read and understood and put robust reporting methods in place.	1, 9 and 10

Once you've established your risk ratings you can start to prioritise your risk mitigation process. This means you'll have identified what risks are most likely to occur and what the potential for further abuse is. You can then apply what you've found to put prevention or reduction measures in place via your policies, procedures, codes of conduct or other protective strategies.

* More information on this will be available in the OCG's Recruitment Resource, currently under development



While some risks may be considered ‘unmodifiable’, that is, inevitable, there are often measures that can still be put in place. In situations where children are left alone with non-related adults (out-of-home care or elite sport coaching) for example, one option is to introduce protective behaviours training for the children. You should challenge yourself to find solutions that reduce risk in every setting.



Step 6 - Identify and introduce suitable protective strategies for each risk

Creating an action plan

Once you've established your risk ratings you can start to prioritise your risk mitigation process. This means you'll have identified what risks are most likely to occur and what the potential for further abuse is. You can then apply what you've found to put prevention or reduction measures in place via your policies, procedures, codes of conduct or other protective strategies.

As mentioned earlier, preventing risk doesn't have to be expensive and your risk mitigation strategies should consider simple, cheaper methods wherever possible. You should attempt to carry out a 'cost/benefit' analysis of risks that appear only to have expensive solutions. If the cost of controlling the risk is challenging for your organisation, can you find other, cheaper but equally effective solutions?

One way to work through the development of your action plan is by having a group of people working through different ideas of what can prevent children being harmed in all the settings you work in. The more people you work with, the more ideas and experience you have to draw on. Sometimes it's the smallest ideas that have the biggest impact.

For example, a sign in and sign out procedure for children is a simple and effective protective strategy to ensure that no child is left in a childcare centre after closing time. It can be made stronger by having an additional procedure which says that the last adult in the centre (the person physically locking the doors as they exit) confirms all children have been signed out and that all rooms are empty.

- **In some scenarios, such as a community area, a manager may not have direct responsibility for the care of children who use the space. In these situations the manager should attempt to ensure that the person *who does* have responsibility for the children has applied appropriate risk management measures.**

Some protective strategies can be put in place even before an adult begins working with children. They can start from the moment you advertise the position, as you can make public your organisation's commitment to valuing the safety of children and young people. This will allow potentially unwanted applicants to 'self-select' and decide not to apply for a role in your organisation. This emphasis on child safety can be maintained in all aspects of your recruitment, staff support and training processes.

All the risks and the protective strategies you identify can be combined with your policies, procedures and codes of conduct to create your action plan. You should consult with children and young people wherever possible to obtain their input on the plan. They will often identify things you have missed and give you useful suggestions to make it stronger. It also helps empower them.

Your action plan should:

- Describe all risks
- Rate their likelihood and consequence
- Identify existing protective strategies
- Propose new protective strategies where necessary.

It can be created by combining your risk identification document with your risk assessment one, as shown on the next page.





Step 6 - Identify and introduce suitable protective strategies for each risk

Risk title and description	Cause and consequence	Existing protective strategies	Current risk assessment – with existing controls			
			Current risk consequence	Current risk likelihood	Current risk rating	Effectiveness of existing controls. How effective are the current controls we have in place? (Acceptable or unacceptable)
<p>Define the risk event including a risk title and a short description.</p> <p><i>What can go wrong?</i></p>	<p>Describe the risk event's causes and consequences.</p> <p><i>What would allow it to occur (causes)? What are the impacts if it does go wrong (consequences)?</i></p>	<p>Describe any existing policy, procedure, practice or device that currently acts to minimise the risk.</p> <p><i>What is in place now that reduces the likelihood of this risk occurring or its impact if it did occur?</i></p>				
<p>Risk title:</p> <p>Child left alone with a coach after training has ended.</p> <p>Risk short description:</p> <p>Children are at an increased risk of harm when left unsupervised by only one adult.</p>	<p>When a parent often fails to collect their child on time, it means the child is regularly left alone with the coach. This increases the possibility of the child being harmed. This could lead the coach to believe the child has a lack of caring adults in their life.</p>	<p>The club has an induction night and all parents are required to attend. They are required to sign a rule book which includes being on time for drop off and collection. A 'second last parent to arrive must remain with the coach until the last parent arrives' rule can be instigated. Coaches are provided with emergency contact numbers for all children.</p>	Moderate	Occasionally	Medium	Unacceptable





Step 6 - Identify and introduce suitable protective strategies for each risk

The next step is to identify any additional protective strategies that will eliminate the risk of children being harmed or reduce it occurring. The table below lists some additional controls that this sports club can consider:

Treatment	Target risk rating after additional protective strategies			
Describe the actions to be undertaken for those risks requiring further prevention measures. <i>What will be done? Who is accountable? When will it happen?</i>	Target risk consequence	Target risk likelihood	What is the target risk level based on the risk rating matrix?	Effectiveness of proposed controls. How effective are the current controls we have in place? (Acceptable or unacceptable)
Action: <ul style="list-style-type: none"> Parents are required to remain with their child during training Communication of the new rule via email/Facebook/text/emergency parent meeting explaining the new procedures Allowance for parents to share their time at training sessions with other parents with the consent of the leadership team and the parents involved Emergency contact details to be updated. Who: J. Smith, Club Director When: 10 January YEAR	Moderate	Possible	Low	Acceptable
Action: <ul style="list-style-type: none"> New procedure to be developed that ensures if a parent fails to remain with their child and the child is left behind after training finishes then the coach is aware of what procedures to follow All coaches to receive training in the new procedures Parents to be encouraged to remain at training. Who: L. Hughes, Head Coach When: 20 February YEAR				Acceptable





Step 6 - Identify and introduce suitable protective strategies for each risk

By having the additional protective strategies the risk is reduced and in some instances will be eliminated. While having a group of people (including children and young people) identifying the risks and protective strategies is preferable, the action plan should state who in the organisation is responsible for delivering it. It will then be the responsibility of the leadership team to ensure all new actions are approved and implemented.

The following page is a risk management template. You can use this to record the risks you identify in your organisation.



Sample Risk Management Plan

Organisation and context

Organisation name	Sunny Pines Swimming Club
Nature of services provided	The swim centre has a predominately professional workforce that includes prominent national and state level coaches that have each been coaching for over ten years and have a good reputation. All coaches and staff have a WWCC. Swimmers are aged between 10 and 18, with the average age being around 14. There is a mix of male and female swimmers that each train over five times a week, in the pool and gym. As these children and young people are considered 'elite' swimmers, their coaches spend varying amounts of one-on-one time with them. There are opportunities for coaches and swimmers to spend significant amounts of time alone and to build close relationships. Some swimmers have solo sessions with their coaches, particularly during the weeks prior to competitions. Parental involvement is mainly oriented around dropping and picking their children up from training, or watching their children compete when they can. The swim centre has not updated its child safe policies and procedures for over five years.
Baseline expectations*	All staff and volunteers have a verified WWCC
Combined level of risk	High
Date completed	1 January 2022
Last reviewed	N/A



* The Child Safe Standards are principle-based so they can apply to all child-related organisations and be implemented flexibly. The proposed requirement in legislation is that child-related organisations implement child safe practice, guided by the Child Safe Standards. Baseline expectations are that all child-related organisations have in place and/or complete the following: Statement of Commitment to Child Safety, Commitment to Children's Empowerment, Child Safe Policy, Code of Conduct, HR Policy, Complaint Handling Policy and Reporting Policy.

Risk and protective strategies

Identified risk	Risk	Child Safe Standard	Protective strategies and interventions	Governance	Timeframe	Outcome
Lack of focus on children's welfare and wellbeing through absence of child safe policies and procedures	Low	10: Policies and procedures	<p>Policies and procedures will be developed in line with those provided by the NSW Office of the Children's Guardian (examples available online). These are:</p> <ul style="list-style-type: none"> Code of Conduct Commitment to Child Safety Child Safe Policy Complaint Handling Procedure 	President	June 2022	<p>Staff and the community understand the organisation's approach to child safety</p> <p>Staff and the community know that the organisation takes child safety seriously</p>
			<p>Policies and procedures (when developed) will be distributed to all members, including athletes, parents and carers, and placed on our website.</p>	Admin	August 2022	
			<p>The Risk Management strategy will be updated with any additional actions arising from the self-assessment tool.</p>	Executive	August 2022	
Opportunities for coaches to spend significant amounts of time alone with athletes and build close relationships Unclear expectations about staff-child relationships	Moderate	8: Physical and online environment	<p>Leaders set clear expectations around child safety and ensure they are followed by staff. All staff must sign and adhere to the organisation's Code of Conduct which sets clear behavioural expectations around child safety. Staff understand the consequences of breaching a Code of Conduct.</p>	President and Executive	January 2022	Physical environments are safer for children
			<p>Parents are encouraged to stay and watch their children train when they can. A swim lane will be left open for parents and carers to use when their children are training to encourage attendance.</p>	All	January 2022	
			<p>Two deep leadership. There must be at least two adults present when children are training or travelling to competitions. If this is not possible, coaches should log one-on-one training in a log book and parents must be advised and aware of the one-on-one training.</p>	All	January 2022	
			<p>Timetabling will be reviewed so that training sessions are conducted in groups as much as possible.</p>	Lead Coach	March 2022	

Identified risk	Risk	Child Safe Standard	Protective strategies and interventions	Governance	Timeframe	Outcome
Competitive cultures can reduce the likelihood of athletes speaking up when they have concerns Competitive cultures can normalise emotionally abusive practices	High	1: Leadership, governance and culture 2: Children's participation and empowerment	Leaders and staff will champion a set of core values that inform the organisation's approach to child safety. Leaders demonstrate attitudes and behaviours that prioritise the safety of children through the behaviours and practices they reward and challenge. This will include calling out behaviours that do not support child safety, or those that foster a negative competitive environment, such as threatening athletes' success if they speak out about things that concern them. It will also include encouraging a culture of reporting through materials distributed by the club, such as newsletters, and at staff meetings.	President and Executive	January 2022	Organisational culture creates an environment where it is difficult for abuse to occur Children speak-up about their safety and the safety of their friends Staff appropriately respond to and report child abuse
			All staff must sign and adhere to the organisation's Code of Conduct which sets clear behavioural expectations around child safety, including positive behaviours that challenge negative competitive cultures and encourage athletes to say something if they have safety concerns.	All	June 2022	
			Campaign to encourage people to speak up if they see or have concerns about child safety. Information packs will be distributed, and posters put up around the centre, to encourage swimmers to speak up if they see anything that concerns them. Staff and members will be provided with contact details for the centre's complaint handling officer. This will include parents and carers.	Admin	April 2022	
			Athletes will be provided information about internal and external support services and staff will encourage peer support for children.	Admin	March 2022	

Identified risk	Risk	Child Safe Standard	Protective strategies and interventions	Governance	Timeframe	Outcome
Average age of swimmers is 14 years	Moderate	2: Children's participation and empowerment	Opportunities are created for children to be included in organisational decision-making through a survey which will explore how children consider the swim centre could be safer for them, and whether there are any safety concerns.	President	April 2022	Children understand that they are listened to and respected
			Age-appropriate information that describes how adults should behave is provided to children and is consistently reinforced.	Admin	April 2022	Children speak-up about their safety and the safety of their friends



Risk Management Plan template

Organisation details

Organisation name

Nature of services
provided

Combined level
of risk
*See key - combined
level of risk*

Date completed

Last reviewed

Addressing identified risks

[illegible]



Step 7 - Monitor and review

Once your plan is finalised it needs to be implemented. All adults working with children and young people should be aware of the plan. Your publications and social media can let all your stakeholders know about it.

Remember the plan is intended to:

- Create safe environments for children and young people
- Increase the effort needed for an offender to engage in inappropriate behaviour
- Increase the likelihood of offenders being caught
- Support children and young people who report instances of harm
- Remove all excuses for anyone engaging in inappropriate behaviour.

Part of the process of implementing the plan should be a date in the future when it is to be reviewed, to see where it can be improved. This can be every year and after any 'critical' incidents.*

Children and young people should be consulted as part of this process. Adults should research 'best practice' in other organisations to see if new initiatives can make the plan even better. A name, or position title, should be attached to the review process so all your stakeholders know who is responsible for it.



Tips for reviewing

- **Conduct an annual risk audit** – ensure there's nothing in your working environment you've missed when creating your CSRMP, or that's changed since it was implemented
- **Having regular inspections** – leaders use spot checks to attempt to identify weaknesses in the organisation's CSRMP and consult with workers, volunteers, parents and community members, children and young people and, if possible, external consultants
- **Look at current and past incidents records** – these can inform the content of your CSRMP by identifying weaknesses in risk management practices
- **Meet with other child-related organisations** – share information, discuss best practice outcomes, ask them to review your CSRMP against their own, and offer to do the same for them
- **Hold workshops with children and young people** – they are your key stakeholders and will often have insight into your CSRMP from a different perspective to adults (see the Empowerment and Participation resource on the OCG website for more information).¹⁵

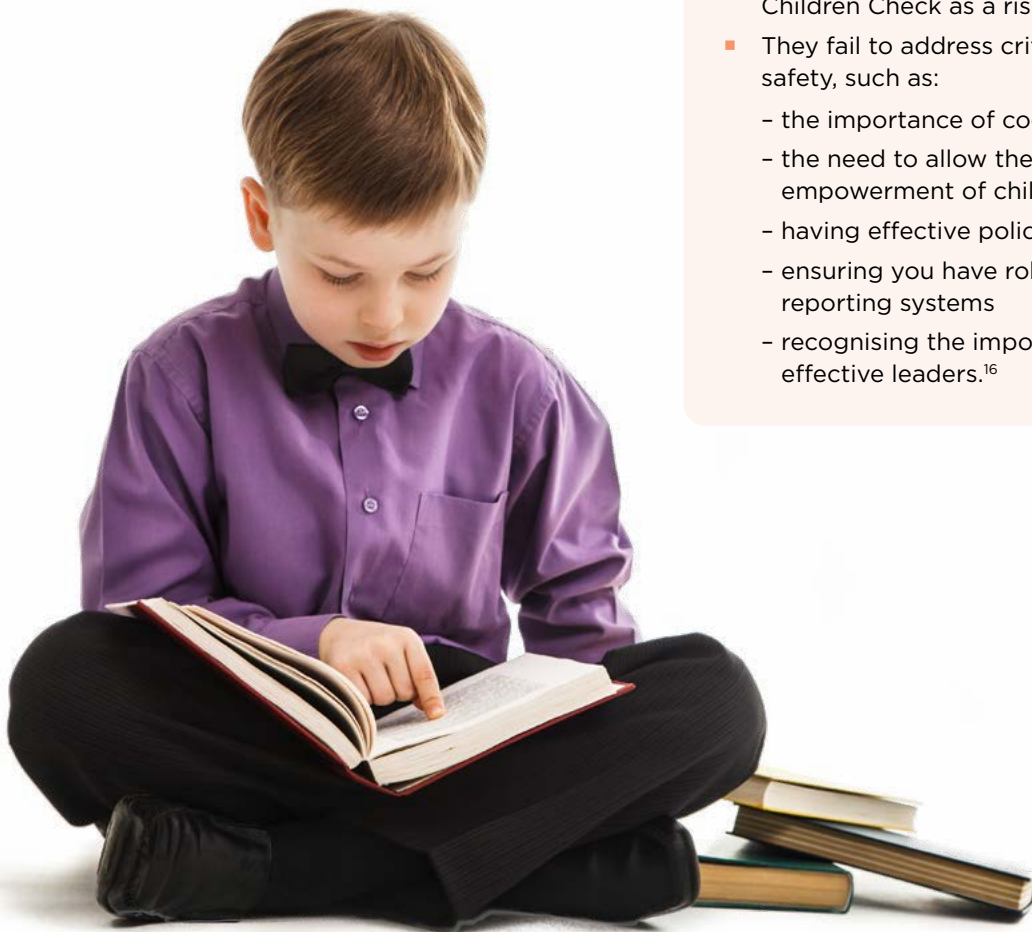
In review

A Child Safe Risk Management Plan is an overarching description of how you intend to keep children safe in your organisation. For you to create one that is suitable for your organisation, you must first understand the risks that can occur in your unique operating setting, or settings. You must then take steps to reduce the chances of harm occurring based on the information you've gathered. In order to do this you need to have a number of things in place:

- An understanding and application of the Child Safe Standards
- Child Safe Policies and Procedures that include a Statement of Commitment to Child Safety that are publicised and understood
- A Code of Conduct (or multiple Codes for different stakeholders) that are publicised and understood
- Reporting processes that are accessible and understood by all your stakeholders.

What are some common reasons CSRMP's are not effective?

- They're not very well prepared
- They're very well prepared, but they're not used
- They're not reviewed
 - regularly
 - after critical incidents*
 - when new activities or programs are commenced, or when other circumstances change, such as the use of new equipment or buildings
- They address easy-to-fix risks but ignore the harder ones
- They rely too heavily on the Working with Children Check as a risk mitigation strategy
- They fail to address critical aspects of child safety, such as:
 - the importance of codes of conduct
 - the need to allow the participation and empowerment of children and young people
 - having effective policies and procedures
 - ensuring you have robust and transparent reporting systems
 - recognising the importance of strong and effective leaders.¹⁶



* A critical incident is any incident of harm, abuse and neglect that occurs in your organisation.

A note on managing Persons of Concern (PoC)

Some organisations embrace the involvement of all community members. They may become aware that some adults are not suitable to work with, or be in the company of, children and young people. This may be because they have revealed a prior history which involves harming children, they have had their Working with Children Check clearance refused, or have displayed behaviours which a reasonable person would understand could lead to a child being harmed.

If a Person of Concern is identified in a club or religious setting and they aren't interacting with children, risk management strategies may still need to be implemented

A PoC safety plan should be created, which at a minimum should include:

- professional advice, such as from a forensic psychologist, regarding the risk of re-offending
- what boundaries are in place such as where the PoC is allowed to go, what times they are allowed to be at the organisation etc
- consequences of breaching the safety plan
- who in the organisation needs to know about the safety plan
- identifying a mentor or someone responsible for the PoC
- identifying places to seek assistance such as child protection services, the organisation's safeguarding unit, police.



Case Study

Andrew was convicted of a child-related offence several years ago. He wants to attend his local place of worship and has asked the leader if he can join the weekly services. A large number of children attend the organisation regularly, so the leader understands Andrew's attendance could pose a risk of harm. The leader speaks with other key people in the organisation and decides they have a suitable mentor that can support Andrew's attendance during worship and safely manage his participation.

The leader meets with Andrew and proposes several conditions Andrew will need to follow. These include staying with his mentor at all times, not having any interactions with children whilst at the organisation and arriving and leaving immediately before and after the service. Andrew is provided with pastoral support by the leader and agrees to meet with his mentor fortnightly. He is made aware that failure to comply with the conditions in the safety plan will result in refusal to attend future services at the organisation.

After three months the leader reviews the safety plan with Andrew and his mentor. The mentor mentioned Andrew had needed to use the bathroom after last week's service. He'd gone to a bathroom that children sometimes used. It was decided that Andrew would not be permitted to use this bathroom in the future and was directed to a bathroom in another building. The safety plan was then updated to include this change.



References

- 1 Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 2
- 2 Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 6, Making organisations child safe, 2017, Sydney, p 155; D Palmer, *The role of organisational culture in child sexual abuse in institutional contexts*, report prepared for the Royal Commission into Institutional Responses to Child Sexual Abuse, Sydney, 2016, pp 36–50.
- 3 T Moore, 'Children and young people's views on institutional safety: It's not just because we're little', *Child Abuse and Neglect*, Vol 74, 2017, p 81.
- 4 Parkinson, P and Cashmore, J: Assessing the different dimensions and degrees of risk of child sexual abuse in institutions, Report to the Royal Commission into Institutional Responses to Child Sexual Abuse pp 8, 9.
- 5 Organisations in scope of the Reportable Conduct Scheme are: Government schools and non-government schools; local health districts; designated out-of-home care agencies; approved education and care services; statutory health corporations; affiliated health organisations; agencies providing substitute residential care (including non-designated Voluntary Out-Of-Home Care (VOOHC) agencies); youth justice centres; public authorities (which includes local councils); religious bodies.
- 6 A 'reportable allegation' is an allegation that a relevant employee has engaged in conduct that may be 'reportable conduct'. A 'reportable conviction' is any conviction of an offence involving 'reportable conduct'. 'Reportable conduct' is defined to mean the following conduct (whether or not a criminal proceeding in relation to the conduct has been commenced or concluded): a sexual offence with or in the presence of a child; sexual misconduct with, or in the presence of a child; ill-treatment of a child; neglect of a child; an assault against a child; behaviour that causes significant emotional or psychological harm to a child; any offence under section 43B or 316A of the *Crimes Act 1900*, whether or not, with the consent of the child.
- 7 See the OCG's Child Safe Policy resource for more information on this document, including a sample and template.
- 8 Adapted from Risk Management Policy, Cumberland City Council, 18 December 2019, p 3.
- 9 Adapted from 'Running the Risk? Risk management tool for volunteer involving organisations' published by Volunteering Australia 2003, © Commonwealth of Australia 2003 p 4.
- 10 Office of the Children's Guardian Annual Report 2020/21 Tables 4.4 and 4.5, pp 32 and 33.
- 11 See also <https://www.childwelfare.gov/pubPDFs/riskprotectivefactors.pdf>
- 12 Valentine, I., Katz, I., Smyth, C., Bent, C., Rinaldis, S., Wade, C., & Albers, B., 2016, *Key Elements of Child Safe Organisations – Research Study*, Royal Commission into Institutional Responses to Child Sexual Abuse, Sydney p 70.
- 13 Adapted from 'Running the Risk? Risk management tool for volunteer involving organisations' published by Volunteering Australia 2003, © Commonwealth of Australia 2003 p 8.
- 14 Adapted from 'Running the Risk? Risk management tool for volunteer involving organisations' published by Volunteering Australia 2003, © Commonwealth of Australia 2003 p 14.
- 15 Adapted from 'Running the Risk? Risk management tool for volunteer involving organisations' published by Volunteering Australia 2003, © Commonwealth of Australia 2003 p 19.
- 16 Adapted from 'Running the Risk? Risk management tool for volunteer involving organisations' published by Volunteering Australia 2003, © Commonwealth of Australia 2003 p 7.

