Risk Management and the Child Safe Standards

Part 1: Responding to risk

A resource for child-related organisations

Contents

Acknowledgement of Country

We acknowledge the Traditional Custodians of the lands where we work and live. We celebrate the diversity of Aboriginal and Torres Strait Islander people and their ongoing cultures and connections to the lands and waters of NSW. We pay our respects to Elders past and present.

We advise this handbook may contain images of deceased persons.

Recognition of survivors

We would also like to recognise the experiences of those who have survived child sexual abuse. The effects of abuse are long lasting and serious. We want to encourage everyone to champion child safety. We owe it to survivors to prevent future abuse, whether it's sexual, physical, emotional or lack of appropriate care.

Note: The information contained in this handbook is for guidance purposes only. Always refer to the legislation to fully inform yourself of your legal obligations.

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 (WHS) risks. Organisations also need to be aware of risks that may lead to the harm or abuse of children.

Child safety cannot occur without effective risk management, and it should ultimately be a shared responsibility between organisations and their communities. This handbook describes how your organisation and broader community can best respond to risk. It complements part 2 of the risk management handbooks. The Child Safe Standards inform both handbooks, and if you work for an organisation that has a role in reducing the risk of harm and abuse to children, then they are for you.

Part 1 describes what risk management looks like and breaks down the steps needed to mitigate it. It will take you through the process of creating a Child Safe Risk Management Plan (CSRMP) and explain why it's valuable.

Part 2 describes risk, including the types of abuse and grooming behaviour, and explains how to recognise offenders and their motivations for offending. It's a companion handbook that provides important background information to help you create a robust CSRMP.

Risk factors must be considered in each individual organisational context and be monitored over time. Types of risk will vary across different organisations. For example, the risks in a sports club will be different from those in a school or religious organisation. 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.[2] A vital component of an organisation's approach to mitigating and preventing risk is a Child Safe Risk Management Plan (CSRMP). This is different to a work health and safety plan (WHS) 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 psychological abuse (also known as emotional abuse), physical abuse, sexual abuse, grooming, misconduct and lack of appropriate care. 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 documents, which should include a:

- Child Safe Policy (that includes a Statement of Commitment to Child Safety)

- Child Safe Code of Conduct

- Child Safe Reporting Policy

- Child Safe Recruitment, Training and Induction Policy.

The OCG has resources to support you to develop all these important documents. See the OCG website for links to PDFs, videos and eLearning.
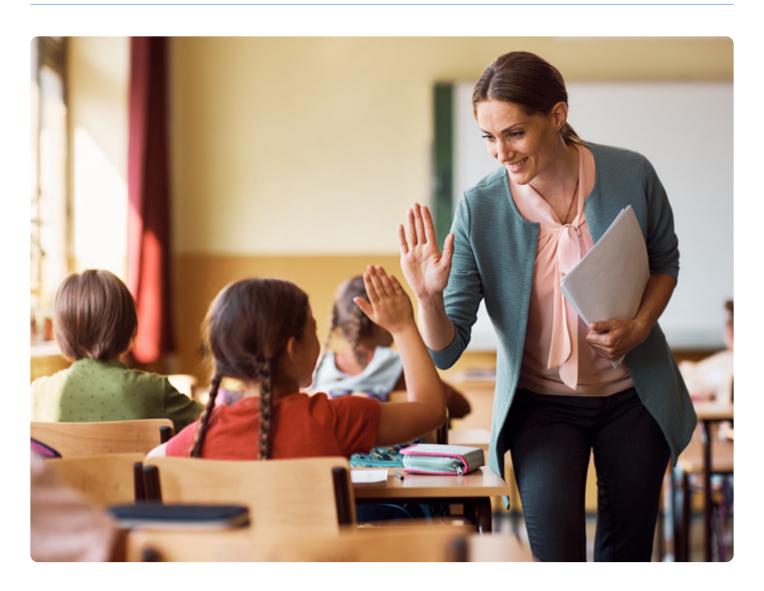
What is risk management in a child-related organisation?[3]

Risk management:

- reduces the likelihood of children being harmed or abused
- means fewer children will have to live with the effects of abuse
- makes your organisation less likely to attract offenders for fear of being caught
- gives staff and volunteers 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 of course a potential benefit
- something introduced by leaders intent on 'micromanaging'
- about preventing adults in child-related employment from 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

Risk management and the Child Safe Standards

STANDARD 1

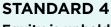Child safety is embedded in organisational leadership, governance and culture

STANDARD 2

Children participate in decisions affecting them and are taken seriously

STANDARD 3

Families and communities are informed and involved

STANDARD 4

Equity is upheld and diverse needs are taken into account

STANDARD 5

People working with children are suitable and supported

STANDARD 6

Processes to respond to complaints of child abuse are child focused

STANDARD 7

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

STANDARD 8

Physical and online environments minimise the opportunity for abuse to occur

STANDARD 9

Implementation of the Child Safe Standards is continuously reviewed and improved

STANDARD 10

Policies and procedures document how the organisation is child safe

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 handbook explains how it can be done. Managing risk supports a culture of safety that includes communication, 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 10 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 (specific information on how to identify and assess risk is given later in this handbook). 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 leaders of child-related organisations can use to improve their child safe practices. A core component of this Standard states: '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 consider risk management to be a priority may not encourage a child safe culture where the children's best interests are 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 from 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 organisation's increased understanding of the experiences and cultures of its stakeholders, as well as the stakeholders' corresponding increased understanding of the organisation, 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 more successful 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 a Child Safe Code of Conduct so 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 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 are supported, vulnerable children will be safer because their needs are more likely to be met. This means they can recognise abuse and report it if it occurs, and be given protective strategies to avoid it. It includes children who may have intellectual and physical disabilities, are from different cultural backgrounds and heritages, are very young, live in remote communities or have a history of trauma. Children should feel culturally safe and know 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 ensuring the appropriate staff and volunteers are employed to work with children. It helps reduce the risk of hiring unsuitable adults to work with children and young people. 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. In addition, there are other useful screening checks such as National Police 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 particularly 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 other adults in oversight roles. They can exploit their positions to avoid scrutiny and reduce 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 if it occurs.

When it's applied

Organisations that are 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 children and young people in their care, including children with disability, in detention or with low self-esteem. If children and young people 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 implement the organisation's child safe policies.

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 good understanding of the strategies perpetrators use to access and abuse children. When they can recognise how and where abuse is occurring, they are better able to prevent 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 make sure all their physical spaces where adults interact with children have clear lines of sight so they're easy for other adults to observe.

If it's not applied

Children can be more at risk where there are increased opportunities for adults to be alone with children – including online. If specific protective strategies 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 conduct site audits and have a Child Safe Code of Conduct that describes any situations that permit adults to be alone with children. Risk management plans should indicate the areas that are out of bounds for children. Adults should be supervised to reduce any opportunities for them to form relationships with children 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 8000 survivors of abuse aged between seven and 93 years old. It identified over 4000 organisations where abuse occurred. It found that it takes an average of 23.9 years for a survivor to disclose abuse. As a result of its research the Royal Commission developed the Child Safe Standards to establish the essential components of a child safe organisation.

If it's not applied

If organisations rely on outdated or ineffective protective 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. Organisations work to establish gold standard child safe practices, setting benchmarks to chart their progress. As a way of proactively addressing risk, they regularly review their risk management strategies and high risk activities.

Child Safe Standard

Standard 10: Policies and procedures document how the organisation is child safe

How risk management applies to this Standard

Effective child safe policies and procedures describe how your organisation manages child safety, including risk. This ensures risk management strategies are robust, properly implemented and fit for purpose. Anyone seeking to harm children is more likely to target organisations where child safety is not seen as a priority. Implementing child safe policies and procedures creates an organisational culture that helps to prevent this from happening. In these environments, risk is minimised and proactively addressed.
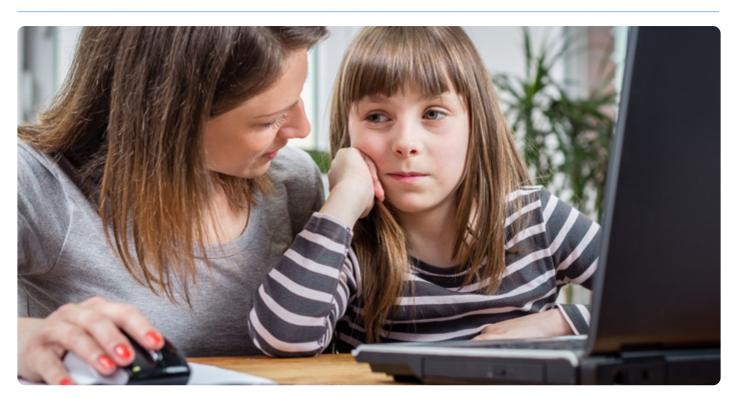
Child safe policies should be reviewed annually and after critical incidents. As your organisation grows and its systems and processes change you should also revisit your risk management plan to ensure it reflects all the services you offer and any potential risks to children they may carry.

If it's not applied

Organisations are more vulnerable to abuse occurring when they do not set down what they consider to be acceptable and unacceptable behaviour in interactions between adults and children. It's difficult to hold staff accountable to standards of acceptable behaviour when they are not clearly established. 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 unacceptable behaviour.

When it's applied

Having a Child Safe Code of Conduct that clearly describes acceptable and unacceptable behaviour means 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 dimensions.[4]

01	02	03	04
Organisational risk	**Vulnerability risk**	**Environmental risk**	**Propensity risk**

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

Dimension	Definition and examples
Organisational risk	An organisation's culture that may make abuse more likely to occur or less likely to be dealt with, including: ■ leaders not supporting or prioritising child safety ■ an emphasis on power, aggression, strength and competition ■ a lack of understanding or awareness of child abuse ■ protection of an organisation's reputation over the safety of a child ■ unclear expectations around staff-child relationships ■ 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 reporting processes. In 'total' organisations, where children and young people live and work for extended periods of time cut off from the wider society, risk can be elevated because of factors such as an increased opportunity for perpetrators to be alone with children.[5] Leadership and culture shape an organisation's attitudes, beliefs and practices, and also influence how adults behave when they interact with children – they understand what is acceptable and unacceptable behaviour and prioritise children's safety. Leadership and culture also influence how organisations operate and make decisions to prioritise children.

Dimension	Definition and examples
Vulnerability risk	The characteristics of the children cared for that may make them more vulnerable to abuse, including: ■ age (some are more vulnerable to certain types of abuse at certain ages) ■ physical or intellectual disability ■ not feeling confident to speak up ■ having experienced prior maltreatment ■ out-of-home care arrangements or challenging home environments ■ different cultural background. Every child is vulnerable to abuse but some children are additionally vulnerable and may be more likely to be targeted. By identifying the factors that may increase a child's vulnerability to abuse, organisations can better understand any barriers that may prevent them from disclosing abuse.
Environmental risk	An organisation's physical and online spaces that may provide opportunities for abuse to occur, including: ■ adults being alone with children and young people (residential settings, for example, allow more opportunities for adults to be alone with children) ■ adults forming relationships with children that could involve physical contact and emotional closeness. Physical and online environments can provide opportunities for grooming to occur and this can progress past seemingly innocent behaviour, which by itself may not be harmful, to abuse. Additionally, adults given opportunities to form relationships with children that involve physical contact or emotional closeness can cross acceptable professional boundaries. Clear behavioural expectations around adult and child interactions should be set out in an organisation's Child Safe Code of Conduct in a way that does not negatively impact on a child's feeling of safety or their interactions with trusted adults.[6]
Propensity risk	A greater-than-average cluster of adults within an organisation with a propensity to abuse children and young people. Men, for example, sexually abuse children and young people more often than women. However, women are more likely to physically assault or neglect children compared to men. '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 elevated vulnerability risk or [environmental] risk profiles, need to give particular attention to strategies that will moderate that risk.' – Report to the Royal Commission into Institutional Responses to Child Sexual Abuse[7]

Read more about each of these risks and how to prevent them in *Risk Management and the Child Safe Standards - Part 2: Identifying risk*.

A practical understanding of risk management

In a child safe context, risk management involves identifying any risks in your organisation that may increase the likelihood of harm or abuse occurring, including poor professional practices or misconduct by staff and volunteers, whether it 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 include accidents and, in a child safe context, deliberate or unintentional harm and abuse perpetrated by adults or other children. Risk of accidents should be addressed in a work health and safety policy. This handbook discusses other kinds of harm and abuse children and young people can be exposed to, including lack of appropriate care. So, while physical injuries could be seen as work health and safety issues, they should also be assessed as instances of potential abuse. (See Part 2: Identifying risk for more information on the different types or harm and abuse and the factors that can increase the likelihood of them occurring.)

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

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

Risk identification and management

1. Identify the settings in your organisation where interactions occur between adults and children. (This is best done as a team to help share the workload and get a broader understanding of potential risks in your organisation.)

2. Identify the specific risks that exist when interacting in those settings.

3. Assess risk likelihood. (You will learn how to do this later in the handbook.)

4. Assess risk consequence. (You will learn how to do this later in the handbook.)

5. Calculate risk rating – low, medium, high. (You will learn how to do this later in the handbook.)

6. Identify and introduce protective strategies, and what you expect to see after implementing the protective strategies (they do not need to be expensive and many can be implemented with no or limited cost). There should be a time frame for when the changes need to be implemented and your organisation should identify who is responsible for implementing and overseeing the protective strategies.

7. Review your approach to risk management annually or after critical incidents. All identified risks and protective strategies should be monitored regularly to ensure they remain fit for purpose.

See the next section 'Developing a Child Safe Risk Management Plan' for more detailed information on how to use these steps to manage risk in your organisation.

Remember, some children are more vulnerable to harm and abuse. They face additional risks that must be considered and monitored in the context of your organisation.

While governance risks, such as those relating to finance and legal outcomes, should be considered, 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[8]

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 across every level of the organsiation and modelling an understanding that keeping children and young people safe is everyone's responsibility

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

Reviewing and monitoring:
regularly monitoring, reviewing and reporting risks

Promoting education and awareness:
creating awareness and a positive attitude to risk management through education and training

Reflective questions

1. What have you done to identify risk in your organisation?
2. How do you consider and demonstrate the Child Safe Standards through your risk management planning?

DEVELOPING A CHILD SAFE RISK MANAGEMENT PLAN

Understanding how to develop a Child Safe Risk Management Plan

Keeping children safe is a shared responsibility for all adults in an organisation, and especially for leaders who should be promoting a culture of protecting children from harm and abuse. One way to do this is with a Child Safe Risk Management Plan (CSRMP). Here's what you need to know to create one.

Your organisation's CSRMP should describe what you can do to prevent or lower the risk of child harm or abuse occurring in your organisation. Putting protective strategies and controls in place to help manage risk in your organisation also provides protection to workers and the organisation itself, in case there are potential allegations of harm or abuse. A good CSRMP means children and young people, their families, communities and the organisation all benefit. For details on types of risk, how to identify grooming and how to recognise offenders, see the OCG's handbook *Risk Management and the Child Safe Standards - Part 2: Identifying risk*. Part 2 provides important background information to help you create a robust CSRMP.

Any approach to risk that prioritises children's safety should have at its heart the following values*:

- 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.

*See also Child Welfare Information Gateway's bulletin 'Risk and Protective Factors for Child Abuse and Neglect'.

A Statement of Commitment to Child Safety describes and underpins an organisation's approach to child safety and its values. Child safe cultures need consistent focus, effort and action by leaders and workers over the long term, and an organisation's Statement of Commitment can help to provide that consistency.

Looking at Standard 1 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 (see *Risk Management and the Child Safe Standards - Part 2: Identifying risk* for more information)
- have a prevention focus that addresses child safety
- have appropriate protective strategies or controls to eliminate or mitigate identified risks
- consider any increased risk with specific activities, and particularly for vulnerable children, but should not discourage positive relationships between adults and children or healthy child development.[9]

First steps

A CSRMP is an opportunity to understand risk in your organisation and develop protective strategies or controls to reduce or remove it. There are a number of steps you'll need to take to create a robust one.

When we talk about addressing the risk, we mean how we can reduce the likelihood of the harm or abuse occurring. Understanding the four dimensions of risk, introduced in section 1 of this handbook (organisational, vulnerability, environmental and propensity) and discussed in more detail in part 2 of the risk management handbooks, can help us to decrease the likelihood. For example:

- **Organisational risk:** This relates to the culture of an organisation. Does your organisation value children? Is there a hierarchical structure that means children's safety is not valued? Does your organisation value its 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?

- **Environmental 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?

When considering the four dimensions of risk, it is important to remember that changing the last three is dependent on external factors and may not be possible under every circumstance. Changing your organisational culture therefore provides the greatest chance to reduce the risk of harm and abuse to children occurring in your organisation.

Pathway to a robust CSRMP

- Identify the benefits and challenges of implementing a CSRMP

- Gain the support and commitment of your leadership team

- Establish a group to manage and coordinate the creation of your CSRMP – remember to think about ways to consult with children and young people when recreating your CSRMP

- Communicate the plan to your stakeholders

- Investigate your environment, thoroughly explore all the potential risks of harm or abuse that exist and begin to design your CSRMP

- Document the protective strategies or controls

- Implement the protective strategies or controls

- Monitor and regularly review the protective strategies or controls[10] – again, remember to consult with children and young people when reviewing your CSRMP

Step-by-step approach to assessing risk

A risk assessment matrix is a helpful way to assess risk. You may have seen one as part of a work health and safety plan. It typically comprises two axes that gauge likelihood and consequence. It asks the person assessing the risk to consider:

- Likelihood: how likely is it that this risk would occur?
- Consequence: what would be the consequences if it were to occur?

In gauging the risk of harm to children, the *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 that are considered highly unlikely should be included in your CSRMP.
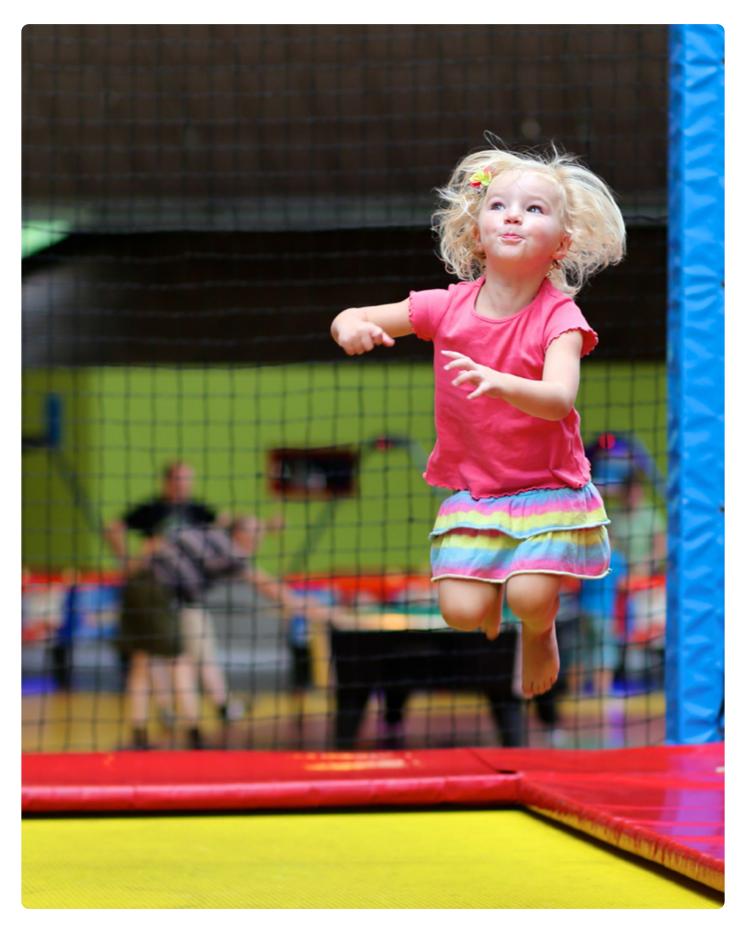
The likelihood of a particular risk occurring will vary depending on the organisation. A risk rated as 'likely' to occur at an early education and childcare centre might only be rated 'possible' at a sports club. This is why your organisation needs to tailor its CSRMP to its unique environment. It cannot simply copy and paste from somewhere else. It must consider all its settings and the risks associated with each.

It is becoming more apparent that harm to children also carries financial and reputational risks, and these may be part of an overall risk assessment. However, harm to children should always be seen as the paramount consideration. Organisations that prioritise risks to children and young people over any to the organisation understand that preventing children from being harmed or abused will also address these other kinds of organisational risks.

Potential responses to risk

1. **Risk avoidance:** An organisation may decide not to run a particular activity because it decides the risks may be too high. Children are disadvantaged because that activity isn't running.

2. **Risk financing:** An organisation decides it will address harm and abuse only if it arises by preparing to cover any financial payouts or ignoring damage to its reputation. The result is children are at risk of harm.

3. **Risk transfer:** An organisation transfers the operation of programs and activities to third party providers without oversight. The result is children are at risk of harm.

4. **Risk control:** An organisation implements robust and effective protective strategies. As a result children are protected from harm and able to participate in activities and programs that support their physical and emotional growth.[11]

Seven steps to an effective CSRMP

Managing risk to keep children and young people safe from harm and abuse is not unlike other standard risk management approaches:

- identify risks
- assess risks
- apply controls or protective strategies
- review controls or protective strategies.

Breaking this down further, you can use the following approach to help you create your CSRMP in seven steps.

Seven steps to creating a CSRMP

Identify

Step 1: Identify the settings (or environments) you operate in where adults interact with children

Step 2: Identify the risks of potential harm and abuse occurring in each setting (or environment)

Review

Step 7: Monitor and review

Step 1
Identify

Step 2
Identify

Step 3
Assess

Step 4
Assess

Step 5
Calculate

Step 6
Protective strategies

Step 7
Review

Assess and calculate

Step 3: Consider the likelihood of each risk occurring

Step 4: Consider the consequence of each risk

Step 5: Calculate risk rating

Control

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

Step 1: Identify the settings (or environments) you operate in

Think of the different settings in your organisation where adults work or interact with children. For 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 the online services and platforms you use. Do adults in your organisation text or use other messaging services to interact with children? Consider, too, games, websites and social media platforms such as Facebook, as well as video conferencing platforms such as Zoom or Skype.

Step 2: Identify the risks in each setting (or environment)

Once you've compiled a comprehensive list of all the physical and online environments you operate in, you need to think about the risks that exist in these spaces. You should even include worst case scenarios because 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 consider establishing a working group or subcommittee to share the load. It's a good idea to see if anyone in your organisation has had previous experience with identifying risk and use what they've learned. You should always consult with the children and young people who attend your organisation, and you can also ask for input from the wider community. To ensure you have covered all possible scenarios, you should look at other organisations' CSRMPs to see what they have identified – but remember not to simply cut and paste but to make it your own. If your organisation is well resourced, you may even want to employ an external professional to assist you.

You should think of the different kinds of harm and abuse that can occur in the environments you have identified, and any potential opportunities for grooming. *Risk Management and the Child Safe Standards - Part 2: Identifying Risk* outlines types of harm and abuse in more detail but they include:

- psychological abuse
- physical abuse
- sexual abuse
- misconduct.

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 environments the organisation considers a risk for potential harm and abuse occurring, and describes the risks in detail in the table below.

Risk setting (name of area)	Brief description of setting (where is the area and what occurs there)
Nappy changing area	The nappy changing areas, toilets and personal care areas located off the main activity areas are separated by a heavy wooden door that is usually closed to provide privacy

Risk title and description (define the risk)	Describe the risk (including causes and consequences)
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.	- 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 CSRMP 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 Child Safe Code of Conduct that would describe acceptable and unacceptable behaviours in the nappy change area (Standard 10).

Matters of high risk

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

There may be a setting that lacks oversight from other adults (environmental risk), like the example of the nappy change room, or it could be because of a power imbalance between the adult and child that an adult exploits (propensity risk). It could also be because adults in the organisation are seen as more important than children (organisational risk). Your Child Safe Policy should address matters of high risk and provide guidance on how adults should behave in these circumstances to help reduce the likelihood of them occurring.

Defining matters of high risk will vary in organisations and should be based on the services you provide. The next three steps will help your organisation calculate whether the risks you've identified are low, medium or high. This will help your organisation prioritise which risks need immediate attention and protective strategies put in place to help reduce the risk from high to low.
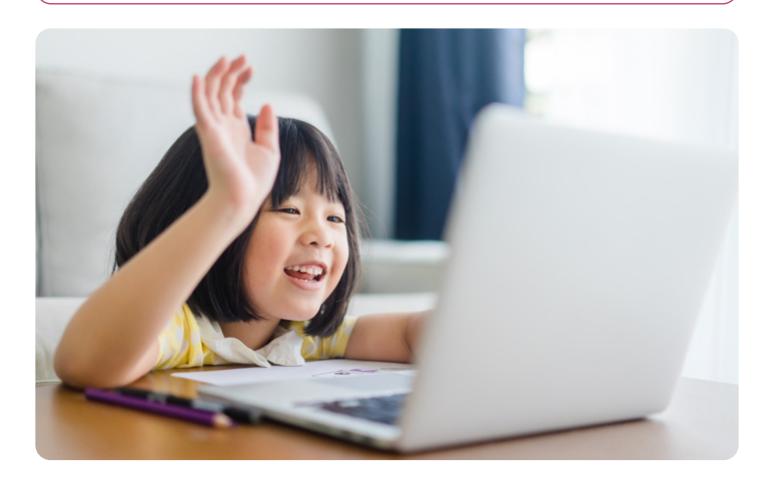
Step 3: Assess the likelihood

When assessing the risk likelihood you can use the following scale.

Rating	Application of the Standards	Description
Unlikely	The Child Safe Standards are applied, adhered to and reviewed regularly.	There are enough protective strategies in place to prevent this kind of harm from happening.
Possible	Some Standards are applied but not all, and they are not regularly reviewed.	Harm could occur; there are protective strategies in place but not all Standards are applied.
Likely	Old systems and procedures are in place but not all are used. The Child Safe Standards aren't applied. The organisation may be hierarchical and other risk factors may be present.	Harm is likely to occur despite some protective strategies, or very likely to occur if the organisation is closed and there are no protective strategies in place.

Step 4: Assess the consequence

While sexual abuse and serious physical assault undeniably fall into the category of 'major', prolonged psychological abuse and lack of care can be just as damaging.
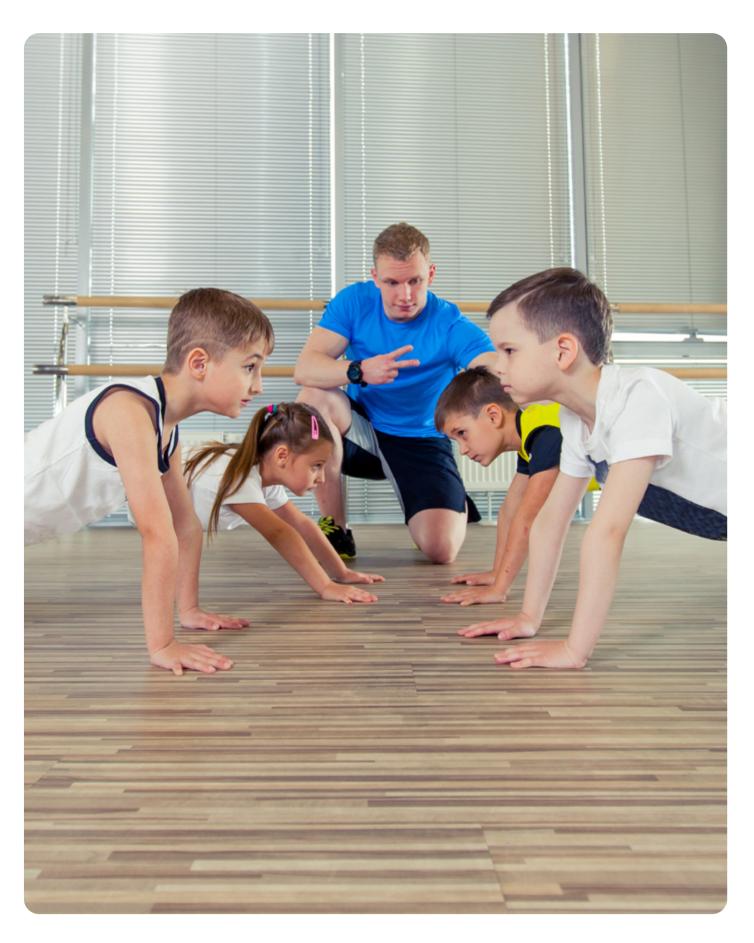
Consequence becomes more severe when the likelihood of it recurring is greater. Similarly, the effect of some actions on vulnerable children may be greater than on other children. For example, the consequence of a one-off incident of physical harm on a child with disability might be greater than for a child without disability. Therefore, when determining consequence your organisation should consider the detriment the harm would cause to the child, if possible.

In terms of risk prevention, consequence in a child safe context is perhaps a less important factor than in a WHS setting. The consequence of an accident could be a graze, a sprain, a break or a death. In other words, the consequence has different levels of severity. However, most people would consider any instance of child sexual abuse as 'major', whether it's 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 rather than the severity level of the abuse itself. Generally, the only way to reduce the consequence is to decrease the likelihood of it occurring.

Consequence	Effect on the child	Examples
Minor	Causing the child some upset or concern	One-off event of poor behaviour such as an adult belittling a child
Moderate	Causing the child significant distress	Instances of bullying, psychological harm, physical punishment or lack of care
Major	Ongoing significant distress or harm	Repeated inappropriate behaviour (bullying, psychological harm and so on) as well as grooming and abuse

Remember, even if a consequence is considered 'minor' it should still be reported if it breaches your organisation's Child Safe Code of Conduct.

Step 5: Calculate the risk rating

To determine the risk rating, use the left-hand column to plot the risk likelihood, then plot the risk consequence along the top.

	Minor	Moderate	Major
Unlikely	🟡	🟡	🟠
	🟡	🟡	🟠
Likely	🟡	🟠	🔴

Using the colour code of yellow, orange and red, the risk ratings are low (yellow), medium (orange) and high (red). To have a low risk rating, the consequence sits at the lower end of the severity scale but as soon as severity level and likelihood increase, so too does the risk rating. It's important to remember that while a risk with a negligible consequence is usually low, it could become a medium risk if it occurs frequently.

Example

In a sports club setting, the risk management team identified a risk of a coach becoming frustrated with a young athlete and verbally abusing them. The team first plotted for a one-off incident. They considered the event as 'possible' and rated the consequence as 'moderate'. They then consulted the risk rating chart.

	Minor	Moderate	Major
Unlikely	🟡	🟡	🟠
Possible	🟡	🟡 **Coach shouting** (one-off incident)	🟠
Likely	🟡	🟠	🔴

The team sees that the event has a yellow rating, therefore indicating a low risk that can be managed by routine procedures or checklists.

Risk ratings

🟡	**Low**	Risks that may be managed by routine procedures or checklists
🟠	**Medium**	Risks that need attention and policy interventions put in place
🔴	**High**	Risks that 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, a coach shouting, but this time the event occurs frequently.

	Minor	Moderate	Major
Unlikely	🟡	🟡	🟠
Possible	🟡	🟡	🟠
Likely	🟡	🟠	🔴 Coach shouting (repeatedly)

Looking at the risk rating chart, the event when repeated has now become a risk with a 'high' (red) rating. This means it needs urgent attention with protective strategies put in place to prevent it occurring.

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

Once you've determined the risk ratings for each potential identified risk in your organisation, you'll need to put in place suitable protective strategies to prevent them from occurring. If they can't be prevented entirely, you'll need to work out how to reduce the likelihood of them occurring. To help you establish your protective strategies, first consult the Child Safe Standards. The Standards provide direction and a framework. See the examples below.

Protective strategies

Type of protective strategy	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	Adults working with children should be suitable to do so with appropriate recruitment processes in place to ensure that they are, including screening processes such as 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 worried, sad or angry	2, 3 and 4
Governance	Leaders model the behaviour they expect from adults; they make sure child safe codes of conduct are read and understood, and put robust child-focused reporting practices in place	1, 6 and 10*

Note: Once you've established your risk ratings you can prioritise your risk prevention process. You'll have identified the risks that need your immediate attention and can work to put protective strategies in place for them first. Based on what you have found, you should review and update your child safe policies to reflect any new protective strategies you have developed, in accordance with Standard 9.

*Standard 10 refers to making sure processes and procedures for how to implement and improve protective strategies are explained in your child safe policies.
†See the OCG's *Child Safe Recruitment and the Working with Children Check* handbook for more information.

While some risks may be considered 'unmodifiable' or inevitable, there are often measures that can still be put in place to reduce potential harm to children. 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 environment.

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

Create a risk register

In addition to using the 10 Child Safe Standards to help you develop protective strategies, you can develop a risk register, which would involve a group of people at your organisation working through different ideas of what can prevent children being harmed in all the environments you've identified where adults and children interact. The more people involved, 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 no child is left in a childcare centre after closing time. With an additional procedure in place, which says the last adult in the centre (the person physically locking the doors as they exit) checks all children have been signed out and that all rooms are empty strengthens the procedure.

Preventing or reducing risk doesn't have to be expensive and your protective strategies should consider simple, cheaper methods wherever possible. If the cost of controlling the risk is challenging for your organisation, can you find other cheaper, but equally effective, solutions?

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 with a public statement that 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.

You should consult with children and young people wherever possible to obtain their input. They will often identify things you have missed and give you useful suggestions to make it stronger. It also helps empower them.

Your risk register should:

- describe all risks
- rate their likelihood and consequence to calculate the risk rating
- identify existing protective strategies
- propose new protective strategies where necessary.

It would something like what is shown over the next two pages.

- **In some environments, 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 controls.**

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			
Define the risk factor including a risk title and a short description. *What can go wrong?*	Describe the risk factor's causes and consequences. *What would allow it to occur (causes)? What are the impacts if it does go wrong (consequences)?*	Describe any existing policy, procedure, practice or process that currently acts to minimise the risk. *What is in place now that reduces the likelihood of this risk occurring or its impact if it did occur?*	Current risk consequence	Current risk likelihood	Current risk rating	Effectiveness of existing controls. Are the current protective strategies we have in place acceptable or unacceptable?
Risk title: Child left alone with a coach after training has ended. **Risk short description:** Children are at an increased risk of harm when left unsupervised by only one adult.	When a parent often doesn't pick up their child on time, the child is left alone with the coach. This increases the possibility of the child being harmed or abused.	The club has an induction night – all parents are required to attend and asked to sign a rule book that includes a commitment to being on time for drop off and pick up. A 'second last' rule is instigated: the second-last parent to arrive must remain with the coach until the last parent arrives. Coaches are provided with emergency contact numbers for all parents or carers.	Major	Likely	High	Unacceptable

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

The next step is to identify additional protective strategies that will reduce the likelihood of children being harmed. The table below lists some additional controls the sports club can consider.

Protective strategy	Target risk rating after additional protective strategies			
Describe the actions to be undertaken for those risks requiring further protective strategies. *What will be done? Who is accountable? When will it happen?*	Target risk consequence **Note: It's often the case that the consequence cannot be changed. The main objective should always be to change the likelihood.**	Target risk likelihood	What is the target risk rating?	How effective have the new controls or protective strategies been? Are they acceptable or unacceptable?
Action: ■ parents are required to remain with their child during training ■ parents are allowed to share their time at training sessions with other parents as long as they have the consent of the leadership team and the parents involved ■ the new rule will be communicated in a number of ways, email, Facebook, text or emergency parent meeting, to explain the new procedures ■ emergency contact details to be updated **Who:** J. Smith, Club Director **When:** 10 January YEAR	Major	Unlikely	Medium	Acceptable
Action: ■ new procedure to be developed that ensures coaches know what to do if a parent fails to remain with their child and the child is left behind after training ■ all coaches to receive training in the new procedure ■ parents to be encouraged to remain training **Who:** L. Hughes, Head Coach **When:** 20 February YEAR				Acceptable

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

While it's preferable to have a group of people (including children and young people) help your organisation identify risks and protective strategies, the Child Safe Risk Management Plan should state who in the organisation is responsible for delivering it. It will then be the responsibility of the leadership team to ensure it is approved and implemented.

Read through the sample Child Safe Risk Mangement Plan (see Appendix C) to help your organisation understand what's included in a CSRMP, then use the template (see Appendix D) to create your own.

Step 7: Publicise and review

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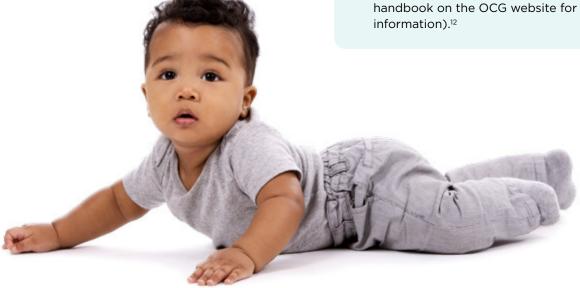
Remember the plan is intended to:

- 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 or abuse
- remove all excuses for anyone engaging in inappropriate behaviour.

Your CSRMP should include a date when it is to be reviewed, to see where it can be improved. This can be every year and after any critical incidents, which are any instances where harm or abuse occurs in your organisation.

Children and young people should be consulted as part of this process. Adults should also research best practice in other organisations to see if new initiatives can make their 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.

- **Have regular inspections:** Leaders can use spot checks to identify any weaknesses in the organisation's CSRMP, and consult with workers, parents, community members, children and young people and, if possible, external consultants.

- **Look at current and past records for any incidents:** When you update your risk management practices to ensure incidents aren't repeated, your CSRMP is strengthened.

- **Meet with other child-related organisations:** Share information, discuss best practice outcomes, ask them to review your CSRMP 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* handbook on the OCG website for more information).[12]

In review

A CSRMP is an overarching policy that describes 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 the unique environment you work in. You must then take steps to reduce the chances of harm and abuse occurring based on the information you've gathered. To do this you need to have a number of things in place:

- an understanding of the Child Safe Standards, ensuring each is implemented in your organisation

- child safe policies and procedures, including your CSRMP, that are publicised and understood

- a Child Safe Code of Conduct that is publicised and understood (you may want to think about having an age-appropriate version for children and young people)

- reporting processes that are accessible and understood by all your stakeholders, and included in your Child Safe Reporting Policy.

What are some common reasons CSRMPs are not effective?

- They're not very well prepared

- They're very well prepared but they're not used and no one knows about them

- 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 prevention strategy.

- They fail to address critical aspects of child safety such as:
  - having effective policies and procedures in place, including a Child Safe Code of Conduct
  - allowing children and young people the opportunity to participate in the decisions that affect them
  - ensuring robust and transparent reporting systems are in place
  - recognising the importance of strong and effective leaders[13]

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 to have a suitable mentor 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 while 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.

Images used on this page are commercial photography and not actual pictures of anyone who has been exposed to or perpetrated abuse.

Appendix A
Risk management for boards and leaders

An organisation's culture and governance informs the way it operates and responds to issues, and leaders play a critical role in ensuring children's rights, best interests and safety are prioritised. Organisations demonstrate their commitment to child safety by managing risks that may provide opportunities for child abuse (sexual, physical and emotional), misconduct or neglect to occur, or not be responded to appropriately.

Boards 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 for boards and leaders

Boards and leaders sometimes choose to focus on financial risks, yet 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	In November 2021 the NSW Government passed legislation to give effect to recommendations from the Royal Commission into Institutional Responses. This is known as the Child Safe Scheme. The scheme requires many child-related organisations to follow 10 recommendations from the Royal Commission and implement the Child Safe Standards.	Children's Guardian Amendment (Child Safe Scheme) Bill 2021 Part 3A of the *Children's Guardian Act 2019*
Responsibilities of organisation heads under the Reportable Conduct Scheme	Under the Reportable Conduct Scheme*, the head of an organisation is the Head of a Relevant Entity (HRE)[†]. HREs are responsible for the entity's compliance with its legislative obligations under the scheme. Obligations include: ■ notifying the Children's Guardian if they become aware of a reportable allegation or a reportable conviction[‡] ■ ensuring their entity has systems, policies and processes in place for preventing, responding to and reporting reportable conduct (child abuse) – including the capacity to conduct robust investigations.	Sections 29 and 54 of the *Children's Guardian Act 2019*

*Organisations that fall under the Reportable Conduct Scheme include government 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, youth justice centres, public authorities (including local councils) and religious bodies.

[†]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.

[‡]A 'reportable allegation' refers to the conduct of a relevant employee that may be reportable conduct. A 'reportable conviction' is any conviction of a reportable conduct offence. Reportable conduct includes 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; and any offence under sections 43B or 316A of the *Crimes Act 1900*.

Obligation	Overview	Legislation
Duty of care	Organisations have a duty to prevent child abuse from occurring. NSW law imposes a statutory duty on organisations that exercise care, supervision or authority over children to prevent individuals associated with the organisation perpetuating child abuse. The onus of proof is on the organisation, which must establish that it took reasonable precautions to prevent abuse occurring. This could include ensuring it implements proper systems and processes to prevent, detect and respond to abuse.	Part 1B Division 2 of the *Civil Liability Act 2002*
Failure to protect offence	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. An organisation doing child-related work includes but is not limited to: ▪ sports clubs ▪ childcare services ▪ education services ▪ residential care services.	Section 43B of the *Crimes Act 1900*
Failure to report offence	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.	Section 316A of the *Crimes Act 1900*

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 their Statement of Commitment to Child Safety. See the OCG's *Understanding and Developing a Child Safe Policy* handbook for more information, including a sample and template.

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 management plans should factor in potential legal, financial (including insurance) and reputational outcomes resulting from children being harmed.**

Appendix B
A note on managing Persons of Concern

Some organisations embrace involvement from all community members, and 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 that involves harming children, they have had their Working with Children Check clearance refused, or they have displayed behaviours that a reasonable person would understand could lead to a child being harmed.

If a Person of Concern (POC) 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 reoffending
- what boundaries are in place (such as where the POC is allowed to go) and what times they are allowed to be at the organisation
- 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 if need be such as child protection services, the organisation's Child Wellbeing Unit (CWU) or police.

Appendix C
Sample Child Safe Risk Management Plan

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 10 years and have a good reputation. All coaches and staff have a WWCC. Swimmers are aged between 10 and 18, with the average age around 14. There is a mix of male and female swimmers who 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. This provides opportunities for coaches to spend significant amounts of time alone with children and young people and build close relationships with them. Some swimmers have solo sessions with their coaches, particularly during the weeks prior to competitions. Parental involvement is mainly centred around drop off and pick 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 2023
Last reviewed	N/A

*The Child Safe Scheme requires all child safe organisations to implement the Child Safe Standards. Baseline expectations are that the Standards are implemented through systems, policies and processes, including but not limited to a Statement of Commitment to Child Safety, a Child Safe Policy, a Child Safe Code of Conduct, a Child Safe Reporting Policy, a Child Safe Recruitment, Induction and Training Policy and a Child Safe Risk Management Plan.

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	Standard 10: Policies and procedures document how the organisation is child safe	Policies and procedures will be developed in line with the Child Safe Scheme These are: ■ Statement of Commitment to Child Safety ■ Child Safe Policy ■ Child Safe Code of Conduct ■ Child Safe Reporting Policy ■ Child Safe Recruitment, Induction and Training Policy ■ Child Safe Risk Management Plan Guidance on how to create these child safe policies is available on the Office of the Children's Guardian's website	President	June 2023	Staff and the community understand the organisation's approach to child safety Staff and the community know that the organisation takes child safety seriously
			Child safe policies (when developed) will be distributed to all members, including athletes, parents and carers, and placed on our website	Admin	August 2023	
			The Child Safe Risk Management Plan will be updated to reflect any additional actions that arise from the OCG's Child Safe Self-Assessment	Executive	August 2023	
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	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.	President and Executive	January 2022	Physical environments are safer for children
			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.	All	January 2022	
			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.	All	January 2022	
			Timetabling will be reviewed so that training sessions are conducted in groups as much as possible.	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	Standard 1: Child safety is embedded in organisational leadership, governance and culture Standard 2: Children participate in decisions affecting them	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 includes calling out behaviours that do not support child safety or foster a negative competitive environment, such as threatening an athlete's success if they speak out about things that concern them It will also include encouraging a culture of reporting	President and executive	January 2023	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 harm and abuse
			All staff must sign and adhere to the organisation's Child Safe Code of Conduct, which sets out 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 2023	
			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, including parents and carers	Admin	April 2023	
			Athletes will be provided with information about internal and external support services should they be required	Admin	March 2023	

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Identified risk	Risk	Child Safe Standard	Protective strategies and interventions	Governance	Timeframe	Outcome
Average age of swimmers is 14 years	Med-ium	Standard 2: Children participate in decisions affecting them and are taken seriously	Opportunities are created for children to be included in organisational decision-making with a survey that will explore whether there are any safety concerns for them, asking them to consider ways the swim centre could be safer for them	President	April 2023	Children understand that they are listened to and respected
			Age-appropriate information that describes how adults should behave is provided to children and consistently reinforced	Admin	April 2023	Children speak-up about their safety and the safety of their friends

Place your organisation's logo here

Child Safe Risk Management Plan

A Child Safe Risk Management Plan explains what your organisation does to prevent or lower the risk of child harm or abuse occurring in its physical and online environments. You can use this template to create your Child Safe Risk Management Plan.

Title	Content
Nature of services provided	
Date completed	
Next review date **[Include a date when the plan will be reviewed and who is responsible for the review, noting that if there are any critical incidents the plan will be reviewed immediately]**	

Identified risks and their protective strategies

Identify settings where interactions occur	Identify risks in interactions	Assess risk likelihood	Assess risk consequence	Determine risk rating	Identify and introduce protective strategies	Regularly review
Think of the different environmental settings in your organisation, physical and online, where adults work or interact with children	Think about the specific risks that exist when interacting in those settings	Assess the likelihood of the risk occurring	Assess the consequence of the risk occurring	Use a risk assessment matrix to allocate ratings for likelihood and consequence for an over risk rating	Identify what protective strategies already exist and what strategies need to be developed to help minimise the risk	Regularly review to make sure any protective strategies implemented are working

Endnotes

1   Royal Commission into Institutional Responses to Child Sexual Abuse (2017) *Final Report: Nature and cause*, 2:16, Commonwealth of Australia, accessed 27 February 2023.

2   Royal Commission into Institutional Responses to Child Sexual Abuse (2017) *Final Report: Nature and cause*, 2:180, Commonwealth of Australia, accessed 27 February 2023.

3   Adapted from 'Running the Risk? Risk management tool for volunteer involving organisations' (2003), p 4, Volunteering Australia, Commonwealth of Australia, accessed 27 February 2023.

4   P Parkinson and J Cashmore (2017) 'Assessing the different dimensions and degrees of risk of child sexual abuse in institutions', Commonwealth of Australia, accessed 27 February 2023.

5   P Parkinson and J Cashmore (2017) 'Assessing the different dimensions and degrees of risk of child sexual abuse in institutions', pp 86-89, Commonwealth of Australia, accessed 27 February 2023.

6   T Moore (2017) 'Children and young people's views on institutional safety: It's not just because we're little', *Child Abuse & Neglect*, volume 74, Elsevier, accessed 27 February 2023.

7   P Parkinson and J Cashmore (2017) 'Assessing the different dimensions and degrees of risk of child sexual abuse in institutions', pp 8-9, Commonwealth of Australia, accessed 27 February 2023.

8   Adapted from Risk Management Policy (2019), p 3, Cumberland City Council, accessed 27 February 2023.

9   I Valentine, I Katz, C Smyth, C Bent, S Rinaldis, C Wade and B Albers (2016) *Key Elements of Child Safe Organisations – Research Study*, p 71, Commonwealth of Australia, accessed 27 February 2023.

10   Adapted from 'Running the Risk? Risk management tool for volunteer involving organisations' (2003), p 8, Volunteering Australia, Commonwealth of Australia, accessed 27 February 2023.

11   Adapted from 'Running the Risk? Risk management tool for volunteer involving organisations' (2003), p 14-15, Volunteering Australia, Commonwealth of Australia, accessed 27 February 2023.

12   Adapted from 'Running the Risk? Risk management tool for volunteer involving organisations' (2003), p 19, Volunteering Australia, Commonwealth of Australia, accessed 27 February 2023.

13   Adapted from 'Running the Risk? Risk management tool for volunteer involving organisations' (2003), p 7, Volunteering Australia, Commonwealth of Australia, accessed 27 February 2023.

Office of the Children's Guardian Child Safe Standards Handbooks

Guide to the Child Safe Standards

Understanding and Developing a Child Safe Code of Conduct

Empowerment and Participation

Reporting Obligations and Processes

Understanding and Developing a Child Safe Policy

Child Safe Recruitment and the Working with Children Check

Risk Management and the Child Safe Standards Part 1: Responding to risk

Risk Management and the Child Safe Standards Part 2: Identifying risk