

PADEA EDUCATION

# Risk Management Strategy

## 1. Purpose

This Risk Management Strategy sets out how Padea manages risks of abuse and harm to the children in its care. Its objective is prevention. It names each risk and its controls, and points to the documents that carry them.

Padea is a child safe entity under the Child Safe Organisations Act 2024 (Qld). That Act requires Padea to implement and comply with the Child Safe Standards and the Universal Principle (s 11), including the standard that physical and online environments promote safety and wellbeing and minimise the opportunity for children to be harmed (s 9(h)). This Strategy documents how Padea identifies, assesses and minimises those opportunities for harm.

## 2. Scope

This Strategy applies to every Padea worker and to every session, site and digital environment connected to Padea's services, for the time a child is in Padea's care. Each physical site is audited under this Strategy through a Site Risk Assessment.

## 3. The Strategy

### a. Risk Management Approach

#### i. Risk Tolerance

Padea has zero tolerance for any risk of severe abuse or harm to a child. Padea accepts low, well-controlled operational risks that cannot reasonably be removed. No worker, student or family is ever penalised for raising a complaint, concern, disclosure or allegation in good faith.

#### ii. Risk Management Cycle

Padea follows the six steps of the National Office for Child Safety method for managing child safety and wellbeing risks. Padea consults with workers, students, families and partner schools at each step.

Step	What Padea Does
Understand the Context	Records the laws, the operating model and the environment that shape Padea's risks.
Identify the Risks	Names each way a child could be abused or harmed, its causes and consequences, and assigns a risk owner.
Analyse the Risks	Rates each risk before controls (inherent), records existing controls, then rates it after controls (residual).
Evaluate and Treat	Compares each residual rating to Padea's tolerance, sets a target, and plans treatments to reach it.
Monitor, Review and Report	Reviews each risk at a frequency set by its rating, tracks its measures of success, and reports to the Director.
Communicate	Makes the Strategy available, explains it to workers, students, families and partner schools, and invites feedback.

#### iii. Risk Rating

Padea rates each risk on 1) the likelihood of abuse or harm and 2) the consequence of abuse or harm. Padea rates likelihood on five levels, by how often the event would occur: almost certain (multiple times a year), likely (once a year), possible (once every five years), unlikely (once every ten years) and rare (once every twenty years). Padea rates consequence on three levels, by the effect on the child: minor (some upset or concern), moderate (distress) and major (significant distress and abuse or harm). Likelihood and consequence give a rating of Low, Medium or High.

Padea rates each risk three times: inherent (before controls), residual (after controls) and target. Controls reduce the likelihood of abuse or harm, not its consequence. Because abuse or harm to a child is always a major consequence, such a risk does not rate below Medium even when well controlled. Where unsure, Padea rates the consequence higher, not lower.

#### iv. Controls and Treatments

A control is a measure Padea already has in place. A treatment is a measure not yet in place; once it is, it becomes a control. Padea uses three kinds of control: preventive controls stop abuse or harm before it starts, detective controls catch abuse or harm early, and corrective controls limit and repair abuse or harm after it occurs. No single control is enough, so Padea layers them: if one fails, another still stands.

#### v. Ownership and Oversight

Responsibility for managing risk is shared across three roles, so the person who carries out a control is not the only one who checks it. Tutors and Managers carry out the controls in each session. Managers also supervise on-site and check the controls are followed. The Director is Padea's Child Safety Officer and holds ultimate accountability for child safety; the Director reviews risk independently and owns this Strategy and its register. Each role's responsibilities and the reporting lines are set in full in the Child Safety Governance document.

Padea is a small business, and no separate governing body oversees the Director. Padea reduces this risk in four ways. The Coordinator, as Deputy Child Safety Officer, is an independent escalation path who acts when the Director is unavailable or is the subject of a concern. Where Padea has engaged an external child-safe adviser, that adviser can review any complaint, concern, disclosure or allegation involving the Director, and check Padea's annual self-assessment. Any worker, student, family, partner school staff or community member can report a complaint, concern, disclosure or allegation about the Director directly to the QFCC. Padea documents the Director's risk management decisions so they can be reviewed at each annual self-assessment.

### **b. Sources of Risk**

Padea identifies risks from its operating model, each Site Risk Assessment, the incidents and feedback raised by students, families, workers and partner schools, and the guidance of child-safety regulators and authorities. The National Office for Child Safety identifies four sources of risk, all of them relevant to Padea:

#### i. Propensity

Propensity is the risk that an adult who would abuse or harm a child gets access to one. Padea controls it by screening every worker before they start, requiring clear

professional boundaries, supervising sessions, and acting on every complaint, concern, disclosure or allegation without delay.

ii. Situational

Situational is the risk created by opportunity. Padea's tutors are recent high-school graduates and current university students, close in age to its students. That closeness can blur the line between an adult and a child, and boundary erosion through private digital contact can pass for ordinary friendliness. Padea also runs after school hours, often after dark, on a near-empty campus, which makes isolation easy and leaves a supervision gap as students arrive and leave.

Padea treats this as the reason its boundary, supervision and contact controls must be stronger than a school's, not weaker. Workers are trained to recognise the signs of grooming: one-to-one access to a child, in person or online; contact through personal channels; gifts, favours or escalating attention; boundary-testing or personal comments; after-hours or out-of-scope contact; and isolating a child from others.

iii. Vulnerability

Vulnerability is the risk that a child's circumstances increase their exposure to abuse or harm, or make them less able to raise a complaint, concern, disclosure or allegation. This includes Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with disability, children with refugee or asylum-seeker experience and LGBTIQ+ children.

A more vulnerable child is both more likely to be targeted for abuse or harm and less likely to report it, so meeting these needs is a necessary control. In practice, Padea adapts its environment, communication and support to each child's needs, so every child is safe and able to speak up.

iv. Institutional

Institutional is the risk created by Padea's own structure, culture and practices. Padea addresses it through its governance, policies and procedures.

**c. Working with Partner Schools**

Padea runs its service on a Partner School's campus, which the school owns and controls. Because of that, Padea cannot assume the environment is safe, so it verifies each site through a Site Risk Assessment before use, each year, and after any incident or material change to the site. Padea owes a direct, non-delegable duty of care to the children in its care, and cannot hand that duty to the school.

Responsibility is shared but clear. The school is responsible for the site, including its security, lighting, fire and emergency systems. Padea is responsible for its service, its workers and the children in its care, including responding to an emergency itself when school staff are not present after hours. Children at the school who are not enrolled in Padea's service are not in its care, and remain the school's responsibility. Padea still redirects them from its service area, and acts without delay if any child appears at risk. The Service Agreement with each school sets out the responsibilities of each party. Padea confirms the following commitments with each Partner School:

Commitment	What Padea Does
Named Contact	The Manager is Padea's on-site contact during sessions, and the Director is contactable at any reasonable time.
Incident Notification	Padea notifies the Partner School without delay of any complaint, concern, disclosure or allegation involving its students or campus, so the school can meet its own obligations, except where that would put a child at risk or compromise a report to or investigation by the authorities.
Site Safety	Padea uses a site only once a Site Risk Assessment confirms it is safe.
Information Sharing	Padea shares a child's or their family's sensitive information with the Partner School only to protect a child.
Standing of Workers	Padea's workers act under Padea's direction and Code of Conduct, not as agents of the school.

Where responsibility or authority between Padea and the Partner School is unclear, the Manager acts first to keep students safe, then raises the matter with the Director without delay.

#### **d. Risks and Controls**

##### **i. Abuse or Harm to a Child by an Adult**

Padea works to prevent harm to a child in all its forms. Harm caused by an adult usually begins with grooming, and Padea places controls at every stage. Before a worker has access to students, Padea verifies their Blue Card and confirms they have completed the relevant training and signed the Code of Conduct. During sessions, Padea keeps open sightlines, allows no one-to-one isolation or private contact and holds every worker to clear professional boundaries. When a complaint, concern, disclosure or allegation is made, Padea receives it without promising confidentiality, reports it without delay, stands the worker down, makes any mandatory reports and notifies the Partner School. Tutors do not investigate concerns themselves. These controls are set out in the Code of Conduct, the Site Risk Assessment and the Child Safety Governance document.

##### **ii. Physical Environment**

The risks here are an unsupervised arrival and departure window, poor sightlines and an unauthorised person entering the space. The Site Risk Assessment audits each site before use and Padea's policies, procedures and training, control these risks.

##### **iii. Digital Environment**

Private digital contact between a worker and a student is the main risk here. Worker and student communication occurs only through official Padea channels. Images of students are taken or shared only on Padea-approved equipment, for an approved purpose and with consent recorded. If a student makes private contact, the worker does not respond, keeps any evidence and tells the Director without delay. These rules are set in the Code of Conduct.

##### **iv. Peer-to-Peer Harm**

Students can harm one another through bullying, harassment, exclusion or harmful sexual behaviours. Padea keeps groups small and supervises group dynamics. Padea treats harmful sexual behaviours as a child-safety concern, not a discipline matter, and responds through the process in the Complaints Handling Policy.

v. Suitability and Support

The risk is that an unsuitable person gains access to students, or that a worker stops being suitable while engaged. No worker has contact with students before holding a valid Blue Card, completing induction and signing the Code of Conduct, and no one has access while verification is pending. Workers must tell the Director without delay of anything that affects their suitability. Managers supervise workers on-site, and the Director acts on any complaint, concern, disclosure or allegation, removing access as a precaution while a matter is assessed.

vi. Voice and Information

A child who does not know their rights, has no way to raise a complaint, concern, disclosure or allegation, or does not feel safe to do so, may stay silent. A concern raised but not acted on protects a child no more than one never raised. Padea therefore tells students their rights and how to speak up, in age-appropriate ways, and offers a child-focused complaints process, open to students and families, under the Complaints Handling Policy. It keeps families informed and gives them a named contact, the Coordinator. Every worker can raise a concern without fear, and Padea records and acts on every concern without delay. Padea holds sensitive information about children securely and on a need-to-know basis, in line with applicable privacy law and its Privacy Policy.

## e. Risk Register

### i. Rating Table

Likelihood ↓ / Consequence →	Minor (Upset)	Moderate (Distressed)	Major (Significant Harm, Abuse or Grooming)
Almost Certain (several times a year)	Medium	High	High
Likely (about yearly)	Medium	High	High
Possible (about every 5 years)	Low	Medium	High
Unlikely (about every 10 years)	Low	Medium	Medium
Rare (about every 20 years)	Low	Low	Medium

Controls reduce likelihood, not consequence. **Source:** (P) Propensity, (S) Situational, (V) Vulnerability, (I) Institutional. Control Type: (P) Preventive, (D) Detective, (C) Corrective. Owner: (D) Director, (M) Manager, (C) Coordinator.

### ii. Risk Register

#	Risk	Source	Inherent	Key controls (type → home document)	Residual	Target	Owner	Review
1	A worker grooms or sexually abuses or harms a student	P,S	Possible × Major = High	Blue Card verified, child safety training completed and the Code of Conduct signed before working with students (P → Child Safety and Wellbeing Policy / Code of Conduct); clear professional boundaries, including worker–student contact only through official Padea channels (P → Code of Conduct); no worker alone with a student, with open sightlines maintained (P → Code of Conduct / SRA); the Manager checks on site each session that these controls are followed (D → this Strategy); if a worker is the subject of a complaint, concern, disclosure or allegation, Padea takes precautionary action such as standing the worker down, makes any external reports, coordinates with the Partner School and does not investigate, all without delay or promising confidentiality (Cr → Complaints Handling Policy)	Unlikely × Major = Medium	Rare × Major = Medium	D	Annual; any new worker
2	A worker has private digital contact with a student	S,P	Almost Certain × Moderate = High	Worker–student contact only through official Padea channels, with images of students taken or shared only on approved equipment for an approved purpose (P → Code of Conduct); Padea channels keep a record the Director can review (D → Code of Conduct / Governance); on any reported private contact, the evidence is preserved and Padea suspends the worker's access as a precaution, without delay (Cr → Code of Conduct / Complaints Handling Policy)	Possible × Moderate = Medium	Unlikely × Moderate = Medium	D	Annual; any reported contact
3	An unsuitable worker has access to students	I,P	Possible × Major = High	No worker has access to students until a valid Blue Card is linked to Padea (P → Child Safety and Wellbeing Policy); selection includes a values-based assessment of suitability, and workers are inducted before they commence (P → Child Safety and Wellbeing Policy); Padea monitors ongoing Blue Card validity and acts without delay on any suspension, cancellation or negative notice (D/C → Child Safety and Wellbeing Policy); workers tell the Director without delay of anything affecting their Blue Card or suitability (P → Code of Conduct)	Rare × Major = Medium	Rare × Major = Medium	D	Annual; any Blue Card notification

4	A student is isolated with a worker	S	Likely × Major = High	Each site is assessed for blind spots and isolated spaces, and is used only once the Site Risk Assessment confirms it is safe (P/D → SRA); Tutors and the Manager actively supervise students throughout the session (P/D → Governance); no worker is alone with a student, with open sightlines maintained (P → Code of Conduct / SRA)	Unlikely × Major = Medium	Rare × Major = Medium	M	Annual
5	A student is unsupervised while arriving or leaving	S	Possible × Major = High	Tutors mark attendance at the start of each session, and the Manager promptly follows up any absence with guardians (P/D → Padea App); a well-lit collection area and route that can be easily supervised (P → SRA); no worker walks an individual student to a vehicle, and the Manager remains on site in open view until the last student is collected (P → Code of Conduct)	Unlikely × Major = Medium	Rare × Major = Medium	M	Annual; any new worker
6	A site outside Padea's control is unsafe	I,S	Likely × Moderate = High	Padea uses a site only once a Site Risk Assessment confirms it is safe, and reassesses it each year and after any incident or material change (P/D → SRA); a Service Agreement with each school sets out the responsibilities of each party (P → Service Agreement); a named after-hours school contact is recorded at onboarding (P/D → Onboarding); if a site control fails during a session, the Manager acts first to keep students safe, then notifies the Director and the school without delay (Cr → Governance / Service Agreement)	Unlikely × Moderate = Medium	Rare × Moderate = Low	D	Annual; space change
7	An unauthorised person enters the session space	S,I	Possible × Major = High	Catering deliveries use a parking location and route that minimises student contact (P → SRA); the Manager supervises the space and redirects any non-Padea person, acting without delay on any risk to a child (P/D → Governance / SRA)	Unlikely × Major = Medium	Rare × Major = Medium	M	Annual; new vendor
8	A required report or school notification is missed or delayed	I	Possible × Major = High	The reporting thresholds and who to contact are set out in the External Reporting table (P → Child Safety Governance); workers' personal reporting duties are set out in the Code's Applicable Law, and training reinforces them (P → Code of Conduct / Child Safety and Wellbeing Policy); Padea checks its records of complaints, concerns, disclosures and allegations against the reports it made, to confirm nothing reportable was missed (D); Padea makes its own external report without delay and independently of the school, and notifies the partner school without delay (Cr → Complaints Handling Policy / Child Safety Governance)	Rare × Major = Medium	Rare × Major = Medium	D	Annual
9	A child's personal information is lost or exposed	I	Possible × Moderate = Medium	Information about children is stored securely, with access on a need-to-know basis (P → Privacy Policy); records are kept in line with legislative requirements, and child-safety records are kept longer (P → Privacy Policy); access to children's information is reviewed regularly to confirm it remains need-to-know (D → Privacy Policy); Padea contains and responds to any data breach, and notifies it as required (C → Privacy Policy)	Unlikely × Moderate = Medium	Rare × Moderate = Low	D	Annual; any data breach
10	A child is unable or unwilling to disclose	V,I	Likely × Major = High	Students are told their rights, and how and to whom to raise a concern, in age-appropriate accessible ways (P → Child Safety and Wellbeing Policy / Complaints Handling Policy); Padea removes barriers so every student, whatever their background, language, ability or identity, can raise a concern (P → Child Safety and Wellbeing Policy); child-focused, culturally safe ways to speak up, including a trusted worker or Kids Helpline 1800 55 1800 (P/D → Complaints Handling Policy / Child Safety Governance); Padea reviews how well it meets its students' diverse needs and acts on what it hears (D)	Possible × Major = High	Unlikely × Major = Medium	D	Annual; on feedback
11	A concern about the Director is not handled independently	I	Possible × Major = High	The Coordinator, as Deputy Child Safety Officer, takes carriage of any concern about the Director (P → Child Safety Governance); where Padea has engaged an	Unlikely × Major = Medium	Unlikely × Major = Medium	C	Annual; any concern involving the Director

				external child-safe adviser, that adviser reviews any concern involving the Director and sights Padea's annual self-assessment (P/C); the Director records every risk decision so it can be reviewed (D); any worker, student or family can report a concern about the Director directly to the QFCC (C → Child Safety Governance)				
12	Harmful sexual behaviours occur between students	V,S	Possible × Major = High	Small groups of no more than six named students per tutor, actively supervised by Tutors and the Manager (P/D → Code of Conduct); Padea responds to harmful sexual behaviours as a child-safety concern, not a discipline matter, seeks specialist guidance, and notifies the guardians of those involved and the partner school (C → Complaints Handling Policy)	Unlikely × Major = Medium	Unlikely × Major = Medium	M	Annual
13	A complaint, concern, disclosure or allegation is not raised, escalated or acted on	I	Possible × Major = High	No person is penalised for raising a complaint, concern, disclosure or allegation in good faith (P → Child Safety and Wellbeing Policy / Complaints Handling Policy); students, families and workers each have more than one way to raise a concern, including one that bypasses the person it concerns (P → Child Safety Governance / Complaints Handling Policy); Padea keeps a record of every concern and reviews these records for patterns (D → Complaints Handling Policy / Child Safety and Wellbeing Policy); Padea acknowledges and acts on every concern without delay, and dismisses none (C → Complaints Handling Policy)	Unlikely × Major = Medium	Rare × Major = Medium	D	Annual
14	A worker is unfit for duty	P,V	Possible × Moderate = Medium	Workers work with students only when fit to do so, and tell the Director without delay if they are not (P → Code of Conduct); workers are inducted before they commence and supported by the Manager and the Director (P → Child Safety and Wellbeing Policy); the Manager supervises workers' fitness for duty on-site (D → Child Safety and Wellbeing Policy); the Director supports the worker and, where needed, restricts their duties or stands them down (C)	Unlikely × Moderate = Medium	Unlikely × Moderate = Medium	M	Annual
15	A family is not engaged or informed	I	Possible × Moderate = Medium	Padea informs families of its child safety policies and procedures, and how to raise a complaint, concern, disclosure or allegation (P → Public Commitment to Child Safety and Wellbeing / Complaints Handling Policy); every family has a named point of contact, the Coordinator, at families@padea.com.au (P → Child Safety Governance); Padea keeps families informed about a matter affecting their child, within the limits of confidentiality and the law (P → Complaints Handling Policy); Padea seeks family feedback at each review and acts on it (D)	Unlikely × Moderate = Medium	Rare × Moderate = Low	Coord	Annual; on feedback

Padea reviews each risk at a frequency set by its rating (see the Review column). It also reviews the register after any incident or any complaint, concern, disclosure or allegation, and whenever it adds a new site, tutor cohort or platform, or the law changes. The Director signs off each version. Padea tests whether its controls work, not just whether they exist, and any gap becomes a change to a control, the register or this Strategy. External reporting thresholds and contacts are set out in the Child Safety Governance document, and Padea reports against them without delay. This Strategy does not restate them and treats a missed or delayed report as a risk in its own right.

#### **4. Strategy Ownership**

The Director owns and maintains this Strategy. For any questions about the Strategy, please contact Dylan Chern at [dylan@padea.com.au](mailto:dylan@padea.com.au).

The current version of this document, and of every Padea child safety document, is publicly available at [www.padea.com.au/legal](http://www.padea.com.au/legal). A printed copy is available on request.

