

Child Safety (U18) Risk Management Strategy - HGS

1. Scope

This Risk Management Strategy (RMS) is applicable to Holmes Grammar School (Holmes). The RMS provides direction, strategies, guidelines and procedures developed to help staff support and manage students under the age of 18 enrolled at Holmes' especially those who sit under Holmes Confirmation of Accommodation and Welfare (CAAW) arrangements. This Strategy should be read in conjunction with Holmes Management of U18 Students Policy and Procedures and Child Safe Standards Risk Register.

2. Definitions

- 2.1 **Breach** is any action or inaction deemed contrary to Holmes' Child Safety – Code of Conduct policies and this Risk Management Strategy.
- 2.2 **Parents** refer to the parent or legal guardian of an under 18 domestic / local and international students.
- 2.3 **Staff** refers to all Holmes staff - paid and unpaid, including but not limited to office staff, educators, and volunteers.
- 2.4 **Students refer** to domestic / local and international students under the age of 18.
- 2.5 **U18 Homestay and Welfare Officer** refer to the Holmes staff member nominated to provide general welfare and support services, including the coordination of student Homestays for domestic / local and international students under 18 years of age. Currently this role is fulfilled by the Head of School.

3. Statement of Commitment

- 3.1 Holmes is committed to providing age and culturally appropriate welfare arrangements for the student's accommodation, support and general welfare in accordance with industry, best practice standards and legislation noted in the:
 - ESOS Act 2000 and its amendments
 - ESOS National Code (2018)
 - VRQA Child Safety Guidelines under Ministerial Order 1359
- 3.2 All staff working with students are expected to be familiar with and will be provided with training in regards to relevant standards and legislation and this Risk Management Strategy.
- 3.3 Holmes is committed to ensuring the safety and wellbeing of all under 18 domestic / local and international students and will endeavour to provide a safe environment so the students can successfully pursue their academic and personal development. The

following values reflect Holmes Under 18 student management culture - All students have the right:

- a. to feel safe,
- b. be listened to and heard,
- c. be involved in decisions that affect them,
- d. to have their cultural values respected,
- e. not to be unjustly discriminated against on the basis of their status, activities, expressed opinions or those of their families or carers, and
- f. to have their best interests considered (with parental/guardian consent).

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

- 4.1 All staff are expected to possess valid Working with Children Checks (WWCCs) and to be familiar with and effectively implement Management of U18 International Students Policy and Procedures.
- 4.2 Where possible, a staff member will monitor the interactions of under 18's with those aged 18 or over, during all approved activities to ensure the safety and wellbeing of the students under 18.
- 4.3 Staff should avoid taking videos or photography where images of students under 18 may be included. Where video or photography of such students is taken, written consent of the child and their parent (or guardian) must be sought prior to recording or the subsequent display or distribution of that photo or visual material.
- 4.4 Permissions to record and produce material involving domestic / local and international students under 18 should be documented via a Consent form that should be signed by the student and their parent or guardian and filed appropriately in the students' e-file.
- 4.5 Students are made aware of their rights and obligations in Australia and at Holmes at Orientation and in monthly interviews. Students are expected to maintain regular class attendance (above 80%) and to participate in monthly interviews with the Principal or delegate. Students will be asked about their academic experience and general welfare in such interviews.
- 4.6 An U18 Interview Register will be maintained by the Principal or delegate for all U18 domestic / local and international students.
- 4.7 Attendance monitoring will also be routinely undertaken.
- 4.8 Homestay host/s and Third -Party Homestay providers are expected to be familiar with and will be provided training with regard to Child Safety. Homestay host/s and Third- Party Homestay providers will be expected to abide by Holmes' policy and procedures for working with young children, including any other organisational requirements as set out in written agreements between Holmes and the Host/ Homestay Provider.

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

- 5.1 Holmes' organisational recruitment processes will ensure the recruitment and selection of suitable staff and Homestay host/s and Third -Party Homestay providers.

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

6.1 What is “harm”?

- a. Harm is defined as “any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing.”
- b. Harm can be caused by physical, psychological, or emotional abuse or neglect, or sexual abuse or exploitation through the process of grooming.

6.2 Types of harm

Type	Examples	Indicators of abuse and neglect
Physical	Hitting, providing any inappropriate substances such as poisons, alcohol, illegal drugs or medication b. Domestic and family violence	• showing wariness and distrust of adults • low self-esteem, withdrawn • abusing alcohol or drugs • being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable • feeling suicidal or attempting suicide • being reluctant to go home • malnutrition, poor hygiene, matted hair, dirty skin or body odour • unattended physical or medical problems • comments from a child that no one is home to provide care • being constantly tired • frequent lateness or absence from school • being left unsupervised for long periods • fear of going home
Psychological or Emotional	Verbal insults, hostility, bullying, cultural affront	
Neglect	Not providing sufficient food, housing and hygienic living Conditions	
Sexual/exploitation	Inappropriate touching, kissing or holding a sexual manner Exposing a sexual body part to a child Exposing children to sexual acts or pornography Making obscene phone calls or remarks to a child	
Grooming	Predatory conduct designed to facilitate later sexual activity.	

	Facilitating engagement in or involvement in sexual conduct, whether with the groomer or another adult. Establishing a relationship with the child, parent or carer for the purpose of facilitating sexual activity at a later time.
Student on Student Harm	Student-on-student harm would include incidents related to sexual abuse, bullying, self-harm, and physical harm.

6.3 Handling risks, disclosures and suspicions of harm:

a. Risks, disclosures or suspicions of harm involving a student should be reported to the Principal and/or Head of School in the first instance, where possible.

- If the incident is considered serious, the staff member is encouraged to firstly, act to ensure the young person's safety and wellbeing.
- At the earliest opportunity, the staff member must provide the Principal and/or Head of School with written details of the incident.
- In the event of a conflict of interest, referrals should be made to the Principal to determine the appropriate actions to resolve matters.
- In the case of the Principal's direct involvement in a matter, matters can be referred to the School Council, through management up-lines.

b. The Head of School will then make a confidential written report to the Principal, who will in turn escalate the report to the Child Safety Management team for consultation.

c. Depending on the outcome of the assessment for harm or risk of harm (refer to 6.2 above), the incident/matter may be referred to Police, or other Holmes staff for follow-up.

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

e. The Principal will action any mandatory reporting in accordance with relevant state and federal child safety requirements. This also extends to all mandated staff – please refer to Holmes Grammar School Child Safety Reporting and Complaints Policy.

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

- a. If there are suspicions of harm or concern for a child's welfare, staff should:
 - i. Remain alert to any warning signs or indicators;
 - ii. Pay close attention to changes in the student's behaviour, ideas, feelings and the words they use;
 - iii. Make written notes of observations in a non-judgemental and accurate manner; and
 - iv. Assure the student that they can come to talk when they need to, and listen to them and believe them when they do, and follow any relevant process for reporting a suspicion of harm and consider whether there are requirements to report matters to the Police Service and/or what support services could be offered if the concern does not meet the relevant reporting process.
- b. Any disclosure of harm must be documented. In the first instance, staff should:
 - i. Remain calm and listen attentively, actively and non-judgementally;
 - ii. Ensure there is a private place to talk;
 - iii. Encourage the person to talk in their own words and ensure just enough open-ended questions are asked to act protectively (e.g. 'Can you tell me what happened' or 'Can you tell me more about that');
 - iv. Reassure the person they have done the right thing by telling you; and

Advise the person/ and where appropriate the relevant child that disclosure will be treated confidentially but cannot remain a secret as it may be necessary to tell someone in order to get appropriate help'

- a. Document the disclosure clearly and accurately, including a detailed description of:
 - i. The relevant dates, times, locations and who was present;
 - ii. Exactly what the person disclosing said, using "I said," "they said," statements;
 - iii. The questions you asked;
 - iv. Any comments you made; and
 - v. Your actions following the disclosure.
- b. Do not attempt to investigate or mediate an outcome.
- c. Follow any relevant process for reporting a disclosure of harm consistent with 6.3 above.

6.5 Assessing harm:

- a. Gather information:
 - i. Facts

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

6.6 Reporting guidelines for Harm:

- a. Staff – report risk matters related to an under 18 student to the Principal and/or Head of School (and follow processes as outlined in 6.3 above).
- b. Homestay host/s or Homestay Providers – homestay host/s can report an incident by contacting the Principal and/or Head of School. Contact details, including the Holmes 24/7 Emergency Contact numbers are provided in relevant Homestay contracts and supporting documentation, the latter of which is communicated to homestay host/s and providers during induction, orientation and training events
- c. Others – any person can report an incident to the following contacts:
 - i. Triple 000 if you believe child is in immediate danger of life- threatening situation
 - ii. Holmes 24/7 Emergency Contact numbers

7. Managing breaches of risk management strategy

7.1 Any identified breaches of standards outlined in Child Safety policies and

standards will be risk managed by the Principal in liaison with the Child Safety Management Team. This includes the identification of a risk mitigation plan and a subsequent review of risk control within the Child Safe Standards Risk Register.

8. Risk Management for Planned Off-Site Activities

8.1 From time to time, Holmes may coordinate off-site activities for students' engagement. In conjunction with the Safe Environment Policy the Principal will initially assess the risk of the activity for approval by reviewing the following:

- a. The nature and purpose of the activity
 - i. What are this activity's objectives?
 - ii. Please describe the proposed activity from start to finish.
 - iii. Where is the activity taking place?
 - iv. What environmental factors need to be considered?
 - v. Who is involved in the activity? Parents? Staff? Children?
Will people be external to the organisation?
- b. What is the level of child abuse risk in relation to the activity
 - i. How might a child be harmed?
 - ii. Where or when might harm occur?
 - iii. How might harm occur?
 - iv. Why might harm occur?
- c. An analysis of the risks - The purpose of risk evaluation is to make decisions, based on the outcomes of risk analysis. The level of risk will determine whether a high-risk activity or special event is practical.

9.Strategies for Communication and support

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

- a. Multiple access points for the staff, student and homestay host/s to seek appropriate support and assistance, including via Holmes' Child Safety Reporting and Complaints Policy.
- b. Student Orientation
- c. Home visits
- d. Telephone calls, email and SMS texts to students and hosts
- e. Email contact with students and hosts
- f. U18 Interviews
- g. Homeroom sessions
- h. Homestay host/s orientation interview
- i. Annual Staff Training
- j. Training and Information sessions

9.2 Staff needing additional support can seek assistance from the School

Principal.

10.Evaluation

10.1 A review of the efficacy of this Risk Management Strategy and Controls as identified in the Child Safe Standards Risk Register will be undertaken annually by the School Council.

Version Control and accountable officers

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

Responsible Officer	School Council/Principal		
Implementation Officers	All staff		
Review Date	September 2026		
Approved by			
School Council			
Associated Documents			
Critical Incidents Policy Complaints and Appeals Policy Child Safety Policy Child Safety Code of Conduct Child Safety Reporting and Complaints Policy Holmes Grammar School Staff Manual Privacy Policy Reporting Sexual Abuse Policy, Guidelines and Procedures Child Safe Standards Risk Register			
Version	Brief Description of the changes	Date Approved	Effective Date
1	New Risk Management Strategy	20 August 2019	20 August 2019
2	- Holmes Secondary College changed to Holmes Grammar School - Document reformatted in line with the other school	27 May 2021	27 May 2021

	policy documents		
3	Risk Matrix Amended to reflect students of linguistically diverse backgrounds	29 July 2021	29 July 2021
4	- Clause 10.1 amended to reflect an annual review of the efficacy of the strategies and controls in place - Inclusion of further risk management strategy pertaining to School Council evaluating effectiveness of risk controls	21 October 2021	21 October 2021
5	Risk Matrix amended to reflect Standard 1 – Child Safe School Council Review – no change required	17 August 2022 20 December 2024	17 August 2022 20 December 2024
6.	- The addition of ‘grooming’ as part of types of harm - Addition of Student-on-Student harm - Removed Risk Descriptors for inclusion in Risk	29 th September 2025	29 th September 2025

	Register • Removed Appendix 1 & 2		
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