

Risk Management Policy

July 2022

Summary

This policy applies to Community Language Schools SA and all member schools.

Table 1: Document Details

Policy Number	ES02
Related Policies	All Community Language Schools Policies and Procedures
Version	3.2
Created By	CLSSA Policy Officer
Reviewed By	CLSSA Executive Officer
Applies to	Community Language Schools SA
Key Words	Risk Management Process; Risk Management Cycle; Identifying Hazards; Assessing Risks; Controlling/ Treating Risks; Risk Assessment /Rating Matrix; Risk Assessment and Checklists;
Status	Approved
Approved By	CLSSA Board <i>(Administrative updates approved by Executive Officer)</i>
Approval Date	July 2022
Review Date	December 2023
Notes	Version 3.2 – Administrative and specific content updates

Table 2: Revision Record

Date	Version	Revision Description
January 2017	1.0	New policy developed
March 2017	1.1	Formatting, adding risk of fraud
30 th June 2019	2.0	<ul style="list-style-type: none"> Amend policy to make it generic by replacing individual school details with “Ethnic and Community Language Schools” Changes in ‘Created By’ and ‘Reviewed By’ in Table 1; Changed Contents to Table of Contents; reformatting of table and titles; added new key words to reflect addition of definitions in policy; Changed Further Documentation to References and Other Documentation Reformatting of policy by addition of Hazard; Risk Management Process; Risk Management Cycle; Identifying the Hazard; Risk Assessment; Risk Assessment Matrix; Controlling Risks; Reporting and Documentation; Monitoring and Reviewing Separated Risk Assessment and Checklists from main policy

18 th January 2021	3.0	<ul style="list-style-type: none"> Added School Administrator in Responsibilities Removed numbers 1-5 in Table 6 Update Table 9 to include ES07B and ES16 Amend contents in Table 9 for Playground, Allergic Reaction and Anaphylaxis. Amend the likelihood and/or consequences and probability of risk of the last three column (from below) in Table 9. Also added 'Adult students and visitors, volunteers and parent volunteers in school' column Amend Step 5: Monitoring and Reviewing Change URL to find policies on website
December 2021	3.1	<ul style="list-style-type: none"> Updated policy name in 'Related Policies' (Table 1) Updated policies and names of policies in Table 9
July 2022	3.2	<ul style="list-style-type: none"> Added 'Hazard for children and young people' and 'Risk for children and young people'; in 'Definition' Changes in definition for 'Hazard' and 'Risk' Added content in 'Sexual Misconduct' (formerly Sexual Harassment) and 'Cyber-bullying' in Table 9 Changes in content of ES02C: Risk Management Plan (former-ES02C: Risk Assessment and Checklists)

Table of Contents

Risk Management Policy.....	1
Summary	1
Table 1: Document Details	1
Table 2: Revision Record	1
Risk Management Policy	3
Introduction	3
Definitions	3
Policy	4
Responsibilities	4
Risk Management Process	5
Step 1: Identifying the hazards	6
Step 2: Assessing the risk (Risk Assessment).....	7
Risk Assessment/Rating Matrix.....	8
Step 3: Controlling Risks	9
Step 4: Reporting and Documentation.....	10
Risk Management Checklist.....	10
Step 5: Monitoring and Reviewing	13
References and Other Documentation	13

Risk Management Policy

Introduction

Community Language Schools are non-profit making, after-hours language and culture school open to all students irrespective of their linguistic background. All Community Language Schools work to sustain and develop the languages and cultures of Australian communities. Community Language Schools use premises belonging to the Department for Education, or sites belonging to religious organizations. These sites have been reviewed as acceptable and safe places for ethnic schools to conduct the teaching and learning of language and culture.

Community Language Schools will endeavor to minimize the risk any operation possesses to our school, our personnel, our volunteers, our clients, or the general public. Community Language Schools require a Risk Management Policy to comply with registration requirements.

This policy relates to the care of children and school personnel attending all Community Language Schools and any external events associated with the school. The purpose of this document is to identify applicable risks and enable risk management procedures to be satisfactorily identified, organized, and maintained.

Definitions

Hazard is a potential source of harm or a danger of risk which can cause harm or damage to the students, school personnel, volunteers, clients, the public, the school, or the environment.

Hazard for **children and young people** is when the children and young people are at risk of harm which involves not only physically but also neglect, emotional maltreatment or sexual abuse.

Risk is the probability that exposure to a hazard will lead to a negative consequence to our school, our school personnel, our volunteers, our clients, or the general public.

Risk for **children and young people** are children or young people that are at risk of harm with harm here being physical or psychological harm (whether caused by an act or omission), including harm caused by sexual, physical, mental or emotional abuse or neglect

Risk assessment is a term used to describe the overall process or method where we analyze and evaluate the risk associated with a hazard. This involves *Risk analysis* and *Risk evaluation*

Risk analysis is a process of analyzing the nature, sources, and causes of the risk that have been identified and to estimate the likelihood of the risk or hazard occurring

Risk evaluation is the seriousness of the risk in relation to other risks and how we prioritize the risks

Consequence is the outcome of any event or activity. A single event or activity can generate a range of consequences which can have both positive and negative consequences. Initial consequences can escalate resulting in more severe consequences.

Likelihood refers to the chance of something happening, whether defined, measured or determined objectively or subjectively, qualitatively or quantitatively, and described using general terms or mathematically

Risk Control involves establishing and implementing suitable risk control measures with reference to the risk assessment.

Policy

Community Language Schools have a duty to provide a safe workplace for its school personnel and volunteers, a safe environment for its clients, and a reliable development path for the organization. All Community Language Schools will put procedures in place that will as far as possible, ensure that risks are minimized and their consequences averted.

Responsibilities

It is the responsibility of Community Language Schools, with the assistance of the School Administrator and/or Chairperson and the Risk Management Officer, to carry out risk Management analyses of the organization, and to take appropriate measures.

The responsibilities of the School Administrator and/or Chairperson include but are not limited to ensure that:

- a Risk Management Officer for the organization is nominated
- effective risk management procedures are in place, applicable to all relevant areas
- risk management procedures are reviewed regularly
- recommendations arising out of the risk management process are evaluated and, if necessary, implemented, and
- employees and volunteers are aware of all applicable risks and familiar with the organization's risk management procedures.

The responsibilities of the Risk Management Officer include but are not limited to ensure that:

- risk management analyses are carried out for all relevant sectors of the school
- risk management checklists are prepared for each relevant section
- risk management checklists are reviewed regularly by relevant school personnel with the assistance of the elected Risk Management Officer to ensure that no risks have been overlooked or have ceased to be relevant

- each risk management checklist is reviewed by every section to which it is applicable at least once a year to ensure that procedures are in place to avert the risk or, if that is not possible, to mitigate its impact
- copies of up-to-date risk management checklists are kept in a safe place

It is the responsibilities of all employees and volunteers to ensure that:

- they are familiar with the organization's risk management procedures applicable to their section
- they observe those risk management procedures; and
- they inform their supervisor if they become aware of any risk not covered by existing procedures.

Risk Management Process

Community Language Schools will closely follow the Risk Management Process which is part of the Code of Practice on how to manage work health and safety risks under section 274 of the *Work Health and Safety Act (the WHS Act)*.

The following processes will be employed by all Community Language Schools to identify the risks and hazards related to school activities and events based on the Risk Management Cycle in Diagram 1.

Risk management Cycle is the continuous identification, assessment and prioritization of risks, followed by a coordinated and economical application of resources to minimize or control the probability of occurrence and the impact of negative events, as well as to maximize the realization of opportunities.

There are 5 main steps involved in the Risk Management Cycle:

Step 1: Identify hazards

Step 2: Assess risks

Step 3: Control risks

Step 4: Report and document

Step 5: Monitor and review



Diagram 1: Risk Management Cycle

Step 1: Identifying the hazards

Identifying Hazard is an assessment process to workplace processes and/or environments used to identify possible situations where people may be exposed to injury, illness and/or disease. When identifying hazards, it is recommended that these questions are asked:

- ✓ *What could possibly happen?* Think about anything that could possibly go wrong. This could include things like people hurting themselves, a fire, lack of supervision, negative media coverage of an event.
- ✓ *What are the where, when, why and how events that precipitate risks?* Identify not just physical injuries and observable issues but also risks to do with child abuse and unintentional harm.

In order to identify hazards, the following are recommended:

- Examine past incidents/accidents to see what happened and whether the incident/accident could occur again.
- Consult relevant school personnel to find out what they consider are safety issues:
 - ask workers about hazards near misses they have encountered
 - use a survey or questionnaire to assist in providing information about workplace hazards.

- Inspect or examine work areas or work sites to find out what is currently happening. Document identified hazard to allow further action. School personnel at Ethnic school will use **ES02A: Hazard Report Form** to document any hazard that has been identified.
- Review to determine information about equipment (e.g. operating instructions) and Material Safety Data Sheets for relevant safety precautions
- Welcome creative thinking about what could go wrong, i.e. what hazardous event could take place here?

Step 2: Assessing the risk (Risk Assessment)

A risk assessment is the process of assessing identified hazards; considering what could happen if someone is exposed to a hazard and the *likelihood* of it happening, in order to eradicate, limit and/or reduce the potential injury, illness, disease or any type of harm possible.

When assessing risks, it is recommended that these questions are asked:

- ✓ *How likely is it to happen?* For each risk that you've identified think about how likely it is for it to happen. Consider everything, from the far-fetched to the common, the everyday to the rare.
- ✓ *How serious would the harm be?* If it did happen, how serious could the harm be? Consider the consequence for your organization, children, school personnel, volunteers etc. if harm did occur.
- ✓ *Have a plan of action for each risk identified.* What would you do in response if the identified risk happened? When the harm is serious, and the problem could arise often, you have a risk that needs immediate attention.

Community Language Schools will determine consequences and likelihood of each identified hazard using Table 3 and Table 4.

Table 3: Likelihood of hazard

Likelihood	Almost Certain	Almost certain to occur in most circumstances (>95%)
	Likely	Likely to occur frequently (66% - 95%)
	Possible	Possible and likely to occur at some time (26% - 66%)
	Unlikely	Unlikely to occur but could happen (5% - 25%)
	Rare	May occur but only in rare and exceptional circumstances (<5%)

Table 4: Consequence of hazard- Risk Prioritizing

Consequence	Insignificant/ Very Low Priority	<ul style="list-style-type: none"> • No treatment required.
	Minor/ Low Priority	<ul style="list-style-type: none"> • Minor first aid or minor occupational health safety & welfare liability incident / issue (e.g. minor cuts, bruises, bumps). • Minor behavioral issues.

Moderate/ Medium Priority	<ul style="list-style-type: none"> • Serious injuries and/or illness. • Complex welfare and/or health care issue. • Serious disruption or incident, resulting in distress to children and adults.
Major/ High Priority	<ul style="list-style-type: none"> • Multiple injuries requiring specialist medical treatment or hospitalization; and/or major occupational health safety & welfare liability incident / issue. • Major incident which damages public or parent confidence. • One or more children are lost from the main group.
Catastrophic/ Urgent action	<ul style="list-style-type: none"> • Critical or catastrophic incident. (e.g. Death or permanent disability of adult or child; high level of distress to other parties) • Sustained negative publicity or damage to reputation from a national perspective or from the community welfare perspective.

Many hazards and their associated risks are well known and have well established and accepted control measures. If, after identifying a hazard, you already know the risk and how to control it effectively, you may simply implement the controls as shown in **Diagram 1: The Risk Management Cycle**.

Risk Assessment/Rating Matrix

Community Language Schools will identify the probability of the risk or hazard occurring using the **Risk Assessment/Rating Matrix**. This matrix records the level of risk which is determined by the relationship between the *likelihood* of an incident occurring from the hazard, and the *consequence* caused by the hazard. This is recorded as a numerical code. The relationship between likelihood and consequence determines how dangerous the hazard is.

Table 5: Risk Assessment Matrix

		Consequences				
		Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
Likelihood	Almost certain (5)	Moderate (5)	High (10)	High (15)	Catastrophic (20)	Catastrophic (25)
	Likely (4)	Moderate (4)	Moderate (8)	High (12)	Catastrophic (16)	Catastrophic (20)
	Possible (3)	Low (3)	Moderate (6)	Moderate (9)	High (12)	High (15)
	Unlikely (2)	Low (2)	Moderate (4)	Moderate (6)	Moderate (8)	High (10)
	Rare (1)	Low (1)	Low (2)	Low (3)	Moderate (4)	Moderate (5)

Once the risk has been assessed, the level of priority or urgency to address the risk is identified. The priority level or the **Risk Priority Rating** allows Management Committee to prioritize the hazards identified to ensure that the hazards with high potential of creating an incident are control or treated first. Table 6 outlines the level of acceptance for a given risk that can help in prioritizing risks. **ES02B:** Incident Report Form is used to document how the risk was managed.

Table 6: Risk Priority Rating

Urgent Action - (Risk no 16 - 25)
High Priority - (Risk no 10 - 15)
Medium Priority - (Risk no 4 - 9)
Low Priority - (Risk no 2 - 3)
Very Low Priority - No Action Required (Risk no 1)

Step 3: Controlling Risks

Once prioritization of risk areas has been achieved, actions will be taken to eliminate health and safety risks so far as is reasonably practicable. This is done by Controlling the Risks which is the stage where the actions to identify and implement safety measures to control risks are performed to best protect everyone exposed to the risk. Table 7 outlines the **Risk Control Effectiveness** that can be used to rate the effectiveness of the control measures.

Table 7: Risk Control Effectiveness

Controls	
Risk Rating	Control Criteria
Effective	<u>Controls:</u> <ul style="list-style-type: none"> • Are adequate and effective in addressing the key consequences and causes of the risk • Have been formally documented and proactively communicated • Operating effectively to manage the identified risk
Acceptable	<u>Controls:</u> <ul style="list-style-type: none"> • Are mostly adequate and effective in addressing the key consequences and causes of the risk • Have been formally documented but NOT proactively communicated • Operatively in a satisfactory manner and are providing some level of assurance
Needs Improvement	<u>Controls:</u> <ul style="list-style-type: none"> • The design partially addresses the key consequences and causes of the risk • Documentation and communication of the controls are incomplete, unclear or inconsistent • Not operating consistently • Not implemented in full
Ineffective	<u>Controls:</u> <ul style="list-style-type: none"> • Are ineffective in addressing the key consequences and causes of the risk • Documentation and communication is non-existent • Are NOT in operation or have NOT been implemented yet.

Risk control methods include:

- Elimination: removing the risk entirely
- Substitution: wholly or partly swapping an item or work process for a safer one (for instance, using kids scissors for students, choosing a different location for activities)
- Engineering controls: modifications to the environment or equipment that poses the risk (such as installing handrails at staircase so that students can hold on to while using the staircase)

- Administrative controls: modifications to the workflow or work process (for example, rotating teachers through several different work tasks to prevent repetitive stress injuries)
- Personal protective equipment: safety gear (for instance hats worn by students for outdoor activities)

Step 4: Reporting and Documentation

Community Language Schools have implemented a suite of reporting and investigation procedures that allow school management to investigate areas of improvement, identify preventative measures to be implemented. Incident reports should be completed with factual information and data to enable preventative measure to be put in place for the future.

Documentation of hazard identification and risk assessment systems and procedures is important to ensuring safety and should be clear enough that anyone could read the document and follow the systems and procedures.

Community Language Schools have implemented a **ES02C: Risk Management Checklist** for The Management Committee to conduct a risk assessment and identify strategies to minimize the risk on an annual basis. The Management Committee will identify any further actions required to manage the risk.

Risk Management Checklist

This policy includes thirteen checklists that all Community Language Schools will use to identify and assess risks. Schools will need to specify any additional risks identified during a risk assessment. Where applicable, controls relating school policies and procedures have been included. Schools will need to stipulate specific controls regarding the person responsible, when and how the control will be implement. The checklists are a guide for Community Language Schools and are not exhaustive. Checklists are based on checklists from the Institute of Community Directors: Risk Management Help for Non-for-Profits.

The school management committee will identify hazard, brainstorm ideas and group risks in appropriate risk categories. Consider the effects on people (school personnel, students and other people), information, physical assets and finances, reputation

While identifying Hazards and potential risks on the checklist, schools can refer to Table 8, the Risk Acceptability and Level of Acceptance for assistance

Table 8: Risk acceptability and Level of Acceptance

Risk Acceptability		
Risk Rating	Level of Acceptance	Description
Low	<i>Acceptable with periodic review</i>	Exposure to the risk is acceptable. Risk is subjective to periodic review to ensure that it does not increase and current controls are effective.
Moderate	<i>Tolerable with frequent review</i>	Exposure to the risk may continue. Risk has been appropriately assessed and managed to ensure risk is as low as practicable. Risk is subjective to frequent review to ensure risk analysis remains valid and current controls are effective. Additional treatments to reduce risk are to be considered during review.
High	<i>Tolerable with ongoing review</i>	Risks should be analyzed on an ongoing basis with new treatments identified and implemented. Risk is subjective to ongoing review to ensure controls remain effective, and the benefits balance against the risk. High risks discussed at School Management Committee meetings and reviewed by the Risk Management Officer
Extreme	<i>Unacceptable</i>	Immediately consideration given by the Principle and the Risk Management Officer to determine whether the activity or event associated with the risk should cease. Any decision to continue exposure to extreme risks requires the development of detailed treatments, ongoing collaboration and supervision.

Community Language Schools SA has identified the following areas, situations and activities where there may be hazard for school personnel and students of community language schools. The following list is not exhaustive and schools are encouraged to identify additional hazards.

Table 9: General Risk Assessment for all Community Language School s

Hazard	Likelihood	Consequence	Probability of Risk	Plan of action for each risk identified
Fire	Rare	Minor to Catastrophic	Moderate	Fire Evacuation Plan outlined in ES08 Emergency and Critical Incident Policy and Procedures.
Lack of supervision	Unlikely	Minor to Moderate	Moderate	Supervision of students always during school hours. Dedicated policy (ES09 Supervision of Students Policy) outlining supervision procedures.
Bullying	Possible	Minor to Moderate	Moderate	Dedicated policies outlining behavior management strategies and procedures for dealing with bullying and harassment (ES35 Behavior Support Policy and Procedures; ES38 Bullying and Harassment Policy and Procedures; ES39 Cyber-Safety Policy; ES40 Special Needs Policy; and ES41 Gender Identity Policy and Guidelines)
Child wandering onto a road	Unlikely	Moderate to Catastrophic	Moderate	Supervision of students in place during break time. Dedicated policy (ES09 Supervision of Students Policy) outlining supervision procedures.
Child being struck by vehicle in car park	Rare	Minor to Catastrophic	Moderate	Parents are asked to escort children to school buildings. Dedicated policy (ES09 Supervision of Students Policy) outlining supervision procedures.
Earthquake	Rare	Minor to Catastrophic	Moderate	Evacuation Plan in place. Dedicated policy in ES08 Emergency and Critical Incident Policy and Procedures outlining emergency procedures
Child left at school by parents after school finishes	Unlikely	Minor	Moderate	Parents are informed of school finishing times. A teacher will wait with a child until a parent arrives to collect their child. Teachers to make sure that all their school children are released to their parent's care at the end of school on time.

Sunburn	Likely	Minor	Moderate	Students are required to wear protecting clothing outside and apply sunscreen. Dedicated policy outlining SunSmart procedures ES46 SunSmart policy
Folding tables	Unlikely	Minor	Moderate	Relevant school personnel to set up and store folding tables. First aid treatment provided by trained first aid officer to any injury sustained. Dedicated policy outlining first aid procedures (ES37 Medication, Accident and First Aid Policy and Procedures)
Manipulation of financial reporting	Unlikely	Minor to Major	Moderate	Financial balances and reports occur on an annual basis. Census data used for needs-based funding. ES22 School Safety and Security Policy and Procedures implemented
Playground injuries	Likely	Minor	Moderate	Students supervised whilst using playground equipment. Dedicated policy (ES09 Supervision of Students Policy) outlining supervision procedures. First aid treatment provided by trained first aid officer to any injury sustained. Dedicated policy outlining first aid procedures (ES37 Medication, Accident and First Aid Policy and Procedures)
Theft	Rare	Minor to Moderate	Low	Valuable items securely stored. Dedicated policy outlining procedures (ES22 School Safety and Security Policy and Procedures)
Vandalism	Rare	Moderate	Low	Dedicated policy outlining procedures (ES08 Emergency and Critical Incident Policy; ES22 School Safety and Security Policy and ES25 Managing Trespass and Misbehavior Policy and Procedures)
Allergic Reaction	Rare	Moderate	Low	First aid treatment provided by trained first aid officer. Refer to student Enrolment Form (ES7A) and Student Health Support Form (ES7B) for medication plan and/or treatment plan. Dedicated policy outlining first aid procedures (ES37 Medication, Accident and First Aid Policy and Procedures). Emergency contact person contacted.
Anaphylaxis	Rare	Major to Catastrophic	Moderate	First aid treatment provided. Refer to student Enrolment Form (ES7A) and Student Health Support Form (ES7B) for medication plan and/or treatment plan. Dedicated policy outlining first aid procedures (ES37 Medication, Accident and First Aid Policy and Procedures). Emergency contact person and/or emergency services notified in the event of any anaphylaxis. EpiPen administered (if available).
Animal bite or sting	Possible	Moderate	Moderate	First aid treatment provided by trained first aid officer to any bite or sting sustained. Dedicated policy outlining first aid procedures (ES37 Medication, Accident and First Aid Policy). Emergency contact person and/or emergency services notified in the event of an allergic reaction.
Breach of Privacy	Unlikely	Major	Moderate	Privacy disclaimer on all forms containing confidential information. Forms and documents containing sensitive information securely stored in accordance with the procedures outlined in the (ES10 Personal Information and Photograph Release Policy; ES20 Data and Information Policy and ES22 School Safety and Security Policy and Procedures)
Sexual Misconduct	Unlikely	Major	Moderate	Teacher code of conduct in place outlining expectations for all teachers (ES05 School Personnel Code of Conduct). Dedicated policy outlining the procedures for identifying and dealing with sexual harassment and a range of potential harms to children and young people for example grooming and sexual abuse (ES15 Sexual Misconduct Policy and Guidelines)
Cyber-safety	Possible	Major	Moderate	Restricted use of social media during school hours. Students will also be made aware of cyber safety and cyber bullying outside their community language school hours when the issue is addressed in class Dedicated policies outlining behavior support strategies and procedures for dealing with bullying (ES35 Behaviour Support Policy and Procedures; ES38 Bullying and Harassment Policy and Procedures and ES39 Cyber-Safety Policy).
Unauthorized person on school grounds	Possible	Major	High	Any person who is unauthorized to be on the school grounds is to be questioned by an adult. Dedicated policy outlining the procedures for dealing with trespasses (ES25 Managing Trespass and Misbehavior Policy and Procedures)
Recruiting unsuitable personnel	Possible	Major	High	All personnel to have a Department of Human Services (DHS) Working with Children Check (WWCC) and attend Child Safe Environments Training (Dedicated policies ES01 Child Safe Environments and Procedures and ES14

				Working with Children Check Policy and Procedures). Also refer Dedicated policy outlining recruitment procedures (ES03 Teaching Staff Recruitment Policy and Procedures)
Adult students and visitors, volunteers, and parent volunteers in school	Possible	Major	High	All adult students who are student above 18 years old (Dedicated policy ES16 Adult Students attending Community Language Schools Policy), visitors and parent volunteers [Dedicated policy ES24 Visitor and Parental Policy need to have a Department of Human Services (DHS) Working with Children Check (WWCC). Volunteers (14 years old and above) who assist teachers need to have both a WWCC and attend Child Safe Environments Training. (Dedicated policies ES01 Child Safe Environments Policy and Procedures , ES14 Working with Children Check Policy and Procedures)

Step 5: Monitoring and Reviewing

Community Language Schools Management Committees will meet on a regular basis to discuss and identify any risks or hazards. The Management Committee meetings will work together in identifying the risks and how they can be managed and provide members to identify actions, responsibilities, resources and timeline regarding any identified hazards and assessing risks. Subsequent meetings will review the outcome, develop interventions and identify any improvements. Community Language Schools are encouraged to invite parents to assist in the Risk Management Process.

Community Language Schools will review the risk assessment on an annual basis or in response to a critical incident or event. All risk assessments will be filed and stored in accordance with the **ES22: School Safety and Security Policy and Procedures**

References and Other Documentation

- Our Community Pty Ltd Risk Management Help for Not-for-Profits checklists: [Institute of Community Directors Australia \(ICDA\) | Insurance and...](#)
- Other helpful sites:
 - Identify Hazard: [How to identify Hazards in the School | RS Components \(rs-online.com\)](#)
 - Risk assessment: [Risk Assessment : OSH Answers \(ccohs.ca\)](#)