



Student Safety and Risk Management Procedure

PURPOSE

Ballarat Grammar is committed to ensuring the safety, wellbeing, and empowerment of all students in alignment with Ministerial Order 1359, the Victorian Child Safe Standards, and the School's mission and values. As a regional Anglican school, Ballarat Grammar fosters academic aspiration, trust, opportunity, engagement, resilience, and social and environmental justice. We aim to provide a safe, inclusive, and student-focused learning environment where student wellbeing is paramount.

Ballarat Grammar's student safety program is made up of work systems, practices, policies and procedures designed to maintain a student-safe environment and to embed an organisational culture of student safety within the whole school community. All allegations and safety concerns will be treated very seriously and consistently with our policies and procedures.

The purpose of this procedure is to provide a framework for identifying, mitigating, and managing student safety risks across all school environments, including boarding, homestay, physical and online spaces.

SCOPE

This procedure applies to all staff, volunteers, contractors, and visitors engaged with Ballarat Grammar. It covers student safety risk management across all school activities, including:

- On-campus learning and extracurricular activities
- Boarding and homestay environments
- Online learning and digital communication
- Off-campus activities, excursions, and camps
- Engagement with external service providers

STATEMENT

Ballarat Grammar is committed to embedding student safety considerations into all risk management processes. The School takes a proactive approach to student safety by ensuring that:

- Student safety risks are identified, assessed, and managed within all risk registers.
- Risk mitigation strategies are applied across all School environments to prevent foreseeable harm.
- Staff receive regular training on student safety obligations and risk management strategies.
- A student-safe culture is promoted, where students feel safe, supported, and empowered to speak up.

Ballarat Grammar has zero tolerance for child abuse and is committed to acting in student's best interests and keeping them safe from harm. The School regards its student safety responsibilities with the utmost importance and as such, is committed to providing the necessary resources to ensure compliance with all relevant child protection laws and regulations and maintain a student safe culture.

All staff, volunteers and members of our community have a duty of care to protect the safety, health and wellbeing of all children in their care. As a school with a diverse population, this includes students with a disability, Aboriginal and Torres Strait Islander children and children from culturally and linguistically diverse backgrounds.

STUDENT SAFETY RISK MANAGEMENT APPROACH

Ballarat Grammar integrates student safety into all risk management practices by:

- Embedding student safety risks into all risk registers across School operations in order to ensure student safety is considered across all areas and operations of the School.





- Conducting activity and area-based risk assessments to identify and mitigate potential risks to students.
- Implementing policies and procedures that align with Child Safe Standards and Ministerial Order 1359.
- Providing training to staff, Board members and volunteers to ensure student safety is embedded in School culture and practice.
- Appointing Student Safeguarding Officers who are “Student Safeguarding Champions” at the School. Student Safeguarding Officers receive additional training to ensure that any concerns held by students, staff, volunteers or School community members regarding student safety and protection in the School environment may be discussed in a safe and supportive environment.

PROFESSIONAL BOUNDARIES

To maintain a professional and safe school environment, staff and volunteers must:

- Ensure all interactions with students are appropriate, professional, and supportive of student wellbeing.
- Avoid personal relationships, favouritism, or social interactions that could compromise professional integrity.
- Use only school-approved communication channels when engaging with students.
- Maintain student privacy and uphold clear boundaries, especially in boarding settings.

STUDENT PARTICIPATION AND EMPOWERMENT

Ballarat Grammar ensures students have a voice in maintaining their safety by:

- Encouraging open communication and reporting of safety concerns.
- Providing education on identifying unsafe situations and how to respond.
- Ensuring that reporting mechanisms are clear, accessible, and confidential.

RISK MANAGEMENT STRATEGIES

To proactively mitigate student safety risks, the School implements:

- Clear policies and procedures that address student safety risks and concerns.
- Initial and ongoing student safety training for staff, volunteers, and external providers.
- Verification of VIT Registration and Working with Children Checks for all relevant personnel.
- Structured risk assessment framework and processes for excursions, camps, internal and external learning environments.
- An online risk and compliance workflow management tool that allows for an integrated approach utilising the Schools risk, safety, quality assurance and policy frameworks.
- Active oversight from School leadership and governance bodies.

REPORTING AND RESPONSE PROCEDURES

All student safety concerns must be reported immediately through designated school channels. Staff, volunteers, and students should:

- Report concerns to the designated Student Safeguarding Officers.
- Follow procedures for mandatory reporting of child abuse under Ministerial Order 1359.
- Understand that all reports will be handled with confidentiality and urgency.

ONLINE SAFETY AND WELLBEING

Ballarat Grammar promotes safe online practices by:

- Educating students and parents on cyber safety and responsible digital behaviour.
- Implementing internet restrictions on School devices to prevent exposure to harmful content.
- Monitoring online activity within the School’s network to detect and prevent risks.





BOARDING SAFETY MEASURES

Additional safeguards apply to students in the Ballarat Grammar boarding environment, including:

- Onsite staffing overnight for all boarding houses
- Emergency call processes in place for students to contact staff overnight
- The Senior Staff on Duty (SSOD) can be contacted at any time to ensure access to Student Safeguarding Officers
- Nighttime curfew enforcement and student headcounts undertaken by duty staff each night
- Students are required to sign in and out of the Boarding Houses when exiting and entering
- Maintaining professional boundaries in all staff-student interactions.
- Conducting daily House meetings for student support and communication.
- Implementing mentorship programs to provide social and emotional support.
- Regular welfare checks on vulnerable students
- Ensuring regular updates and communication with boarding families
- Ensuring that no unauthorised visitors are within the boarding environment
- Visitors enter and exit Boarding houses under supervision of MOD / HoH / AHoH
- Leave requests are submitted in advance and are confirmed with parents/guardians and approved by the HoH
- Respectful relationships education (including cyberbullying prevention) is provided to all students
- Access to medical support is available 24/7 via the School Health Centre or community-based health services

EARLY CHILDHOOD SAFETY MEASURES

The CEEd requires additional safeguarding strategies to ensure the safety of School's youngest learners. These strategies include:

- All supervision complies with supervision and educator to child ratios
- Active supervision at all times including during sleep, meal and transition periods
- Frequent headcounts especially during outdoor play and excursions
- All staff are provided with annual training to understand their obligations as mandatory reporters

INTERNATIONAL STUDENT SAFETY MEASURES

Ballarat Grammar recognises that international students may have specific vulnerabilities due to reduced access to their usual familial support networks and may face language and cultural barriers. Additional student safety measures include:

- International Student Welfare Officer to oversee safety, wellbeing and pastoral care of international students
- Additional student check-ins
- Homestay providers must meet all screening and safety standards
- Information and training regarding student safety and student rights is adapted to meet the cultural needs of the student

GOVERNANCE DOCUMENT RESPONSIBILITIES AND COMMUNICATIONS

All documentation within the Governance Framework will be communicated throughout the School including, but not limited to, internal communications such as Nexus posts, staff emails, staff inductions and documentation distribution.

Document Owners are responsible for identifying and managing information-related risks and issues for their assigned information entities and for escalating these to Approval Authorities accordingly. Owners of Governance Documents are accountable for their respective procedures, manuals and work instructions in alignment with their position descriptions.





Appendix A - Applying a Risk Management Framework to minimise potential for child abuse to occur

	Actions	Responsibility	Steps
A	Developing and implementing strategies to identify and remove or reduce risks of child abuse	<ul style="list-style-type: none"> Senior Safeguarding Officer Safety & Risk Department 	<ol style="list-style-type: none"> Develop and maintain the necessary risk management strategies to appropriately mitigate against the risks of child abuse across the School Integrate these strategies with the Risk, Safety, Quality and Policy Frameworks of the School Assist all staff in implementing these strategies across the School Provide analysis to the Senior Leadership Team on reported safety incidents to identify causes and systemic failures to inform continuous improvement
		<ul style="list-style-type: none"> All Staff 	<ol style="list-style-type: none"> Participate in mandatory training and strategies provided to support Student Safety Implement these strategies in all School activities by: <ol style="list-style-type: none"> Identifying and mitigating risks of child abuse taking into account the nature of the environment, the activities expected to be conducted in it (including the provision of services by contractors, partner providers or other outside organisations), and the characteristics and needs of all students expected to be present in that environment; Reporting any identified risks of child abuse and taking action to mitigate risk if immediate intervention is required
		<ul style="list-style-type: none"> Headmaster / Senior Leadership Team 	<ol style="list-style-type: none"> Monitor and evaluate the effectiveness of the risk management strategies against child abuse and of the implementation of risk controls Analyse complaints, concerns and safety incidents to identify causes and systemic failures to inform continuous improvement Report on the findings of relevant reviews of child safe practices to staff and student stakeholders (as required)
B	Utilising student safe recruitment practices	<ul style="list-style-type: none"> Director of People & Culture 	<ol style="list-style-type: none"> Ensure student safety recruitment practices are adopted in accordance with the School's <i>Recruitment Procedure</i>, <i>VIT Registration Procedure</i> and <i>Working with Children Check Procedure</i> Ensure all new employees are provided with an overview of the current Child Safe Standards (Vic) and alignment with their responsibilities as employees
		<ul style="list-style-type: none"> People & Culture Department Safety & Risk Department 	<ol style="list-style-type: none"> Ensure all new employees are provided with training with regard to Student Safety and staff obligations



Appendix B – Educating Staff and Students

Regarding their Responsibilities in Ensuring Student Safety

	Actions	Responsibility	Steps
A	Ensuring all new employees are provided with an overview of the Child Safe Standards and the School's commitment to student safety.	<ul style="list-style-type: none"> Safety & Risk Department Director, People & Culture 	<ol style="list-style-type: none"> Ensure the online staff induction for new employees includes an overview of the Child Safe Standards and the procedures associated with implementing Student Safety at Ballarat Grammar Ensure all staff are aware of the School's Student Safety Code of Conduct and Child Safe Standards Monitor completion of the online student safety induction training Update the information on the online student safety induction training relevant to the current standards. Provide clear information regarding the School's commitment to student safety on the School website.
B	Ongoing training for all employees	<ul style="list-style-type: none"> Safety & Risk Department 	<ol style="list-style-type: none"> Provide at least annual training to all staff on: <ol style="list-style-type: none"> their legal reporting responsibilities warning signs that may indicate any of the following: physical, sexual, emotional and psychological, racial, cultural, religious abuse and/or neglect acceptable and unacceptable behaviour under the School's Student Safety Code of Conduct Maintain records of completion of Student Safety training module
C	Information provided to students regarding expectations and processes aligned to student safety	<ul style="list-style-type: none"> Heads of School 	<ul style="list-style-type: none"> Providing a variety of resources and educational tools through onsite learning, incursions and excursions. Using mentor groups, homerooms and classroom teaching to develop positive relationships. Having clear expectations and straight-forward information regarding School-related documentation such as bullying and harassment policies and ensuring students and parents sign off on these to acknowledge mutual understanding. Implementation and monitoring of a strong wellbeing program delivered in mentor groups regarding the 6 Ways of Wellbeing: <ul style="list-style-type: none"> Care; Move; Learn; Give; Connect; and Notice. Providing opportunities for students to engage in broad extracurricular activities which encourages





			<p>participation but also challenges and provides extension for those seeking it.</p> <ul style="list-style-type: none">• Providing varied and extensive service opportunities for students to engage with the community.• Empowering students to suggest and drive extracurricular and service opportunities, by encouraging an open dialogue, listening to their suggestions and providing support and guidance to enable their ideas to be actioned.• Having clear expectations from students' initial interview stage regarding participation and communication.• Integrating sexual abuse prevention programs, other relevant programs and age-appropriate information throughout the curriculum during the student's progression. This includes but is not limited to the following:<ul style="list-style-type: none">○ The CEEd incorporating body awareness skills into its curriculum including 'Zones of Regulation' and 'Boss of my Body';○ The Junior School utilising the Bounce Back! Program;○ Years 7-9 having a designated health curriculum;○ Year 10 focusing on Respectful Relationships; and○ Years 11-12 utilising external resources such as Elephant Ed presentations and Ballarat Community Health.• Having a strong Wellbeing Department and onsite Health Centre including fully qualified nursing staff and trained psychologists and councillors to answer questions and provide support as required.
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Office Use Only

Document Control / History	
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History	March 2025 – New document – merged <i>Creating & Maintaining a Student Safe Environment</i> and <i>Student Safety Risk Management Policy</i>

Supporting Documents	
<ul style="list-style-type: none"> SSS-001 Student Safety & Support Policy (overarching policy - in development) SSS-002 Student Safety Program Reference Guide SSS -003 Student Safety Definitions and Additional References SSS-004 Student Safety and Wellbeing SSS-005 Student Safety Code of Conduct SSS-006 Student Duty of Care SSS-007 Student Safety and Risk Management Procedure SSS-008 Professional Boundaries Guidelines SSS-009 Responding to and Reporting Allegations of Abuse SSS-010 Our Student Safeguarding Officers 	<ul style="list-style-type: none"> SSS-011 Student Safety Report form – Incident, Disclosure, Suspicion SSS-012 Student Safety Report form – Student Sexual Offending SSS-013 Student Safety Report Form – Early Childhood SSS-014 Student Version – Student Safety & Wellbeing SSS-025 Restraint Guidelines SSS-026 Discipline Policy IDG-003 Privacy Policy ICT-XXX ICT Acceptable Use

Student Lifecycle / Pillars / Values / IDEALS / IB PYP Attributes					
Student Lifecycle	Student Lifecycle Subsection	Pillars	Values	IDEALS	IB PYP Attributes
<ul style="list-style-type: none"> Student Recruitment Delivery of Education Programs Graduation & Community 	<ul style="list-style-type: none"> Marketing & Advertising Enrolments & Offers Finance Teaching & Learning Assessment Experiences Careers / Work Experience Graduation Old Grammarians / Alumni 	<ul style="list-style-type: none"> Governance & Leadership Legislative & Regulatory Compliance Complaints & Compliments People & Culture Finance Community Engagement / Foundation Property & Maintenance 	<ul style="list-style-type: none"> Integrity Aspiration Courage Compassion Responsibility Hope 	<ul style="list-style-type: none"> Internationalism Democracy Environmentalism Adventure Leadership Service 	<ul style="list-style-type: none"> Inquirers Knowledgeable Thinkers Communicators Principled Open Minded Caring Risk Takers Balanced Reflective

Legislative Context
<ul style="list-style-type: none"> Betrayal of Trust Report - Betrayal of Trust Child Safe Standards CCYP The 11 Child Safe Standards Children Youth & Families Act 2005 (Vic) Children, Youth and Families Act 2005 legislation.vic.gov.au Child Wellbeing & Safety Act 2005 (Vic) Child Wellbeing and Safety Act 2005 legislation.vic.gov.au Crimes Act 1958 (Vic) Crimes Act 1958 legislation.vic.gov.au Education & Training Reform Act 2006 (Vic) Education and Training Reform Act 2006 legislation.vic.gov.au Education & Training Reform Regulations 2017 (Vic) Education and Training Reform Regulations 2017 legislation.vic.gov.au Education Services for Overseas Students (ESOS) Act 2000 Federal Register of Legislation - Education Services for Overseas Students Act 2000 Education & Care Service National Law Act 2010 Education and Care Services National Law Act 2010 legislation.vic.gov.au Family Violence Protection Act 2008 Family Violence Protection Act 2008 legislation.vic.gov.au Ministerial Order 1359 ministerial-order-1359-975 National Code of Practice for Providers of Education & Training to Overseas Students 2018 (National Code 2018) Federal Register of Legislation - National Code of Practice for Providers of Education and Training to Overseas Students 2018 National Quality Standard (NQS) National Quality Standard ACECQA Notifiable Data Breaches Scheme About the Notifiable Data Breaches scheme OAIC Privacy Act 1988 (Cth) Federal Register of Legislation - Privacy Act 1988 Worker Screening Act 2020 Worker Screening Act 2020 legislation.vic.gov.au





Regulatory Context				
VRQA	CRICOS / National Code / ESOS Act	ACECQA / Department of Education	International Baccalaureate	Other
<ul style="list-style-type: none"> Education & Training Reform Act 2006 (Vic) – Section 4.3.1 Education & Training Reform Regulations 2017 (Vic) – Part 2A VRQA Guidelines to the Minimum Standards for School Registration Victorian Child Safe Standards Ministerial Order No: 1359 Child, Youth & Families Act 2005 (Vic) Worker Screening Act 2020 (Vic) 	<ul style="list-style-type: none"> Education Services for Overseas Students (ESOS) Act 2000 – Section 5, Section 22 National Code of Practice for Providers of Education & Training to Overseas Students 2018 (National Code 2018) – Standards 2, 5, 6, 11 	<ul style="list-style-type: none"> National Quality Framework (NQF) Education & Care Service National Law Act 2010 – Section 3(2) Education & Care Services National Regulations 2011 – Regulation 168 National Quality Standard (NQS) – Quality Area 2 	<ul style="list-style-type: none"> IB Standards & Practices – Standard C3 PYP: From Principles into Practice 	<ul style="list-style-type: none"> Child Wellbeing & Safety Act 2005 (Vic) Crimes Act 1958 (Vic) – Section 49M Privacy Act 1988 (Cth) Notifiable Data Breaches Scheme Family Violence Protection Act 2008 (Vic)

