Risk Management Framework

Table of Contents

Risk Management Framework Overview

The Diocese of Ballarat Catholic Education Limited (DOBCEL) Board recognises that risk management is integral to achieving our vision, mission and goals. Risk management maximises the ability to deliver on DOBCEL Board objectives, promotes sound decision-making for resource allocation and investment, works to safeguard student and employee wellbeing and contributes to meeting the diocesan community and government expectations for accountable and responsible use of finances and resources.

The DOBCEL Board, Standing Committees and management are committed to implementing this Risk Management Framework (the Framework) to ensure an effective and consistent approach to managing risk in an environment of continuous improvement and ongoing business excellence which enhances DOBCEL's ability to focus on learning and development. The Framework outlines DOBCEL's organisational approach to risk which ensures processes and accountability requirements are clear and consistently applied. The implementation of this framework ensures that all DOBCEL entities embed risk management culture and practices in their business and education processes so that risks are managed effectively and efficiently to deliver DOBCEL's goals and objectives. The Framework will also be used to assist with the development of and updating of resources, guides, tools and training.

Purpose

The purpose of this Framework is to provide a consistent and transparent approach to risk management. This includes how the Board, as the governing authority of schools, will manage all risks including child safety risks. This will ensure compliance with relevant legislation including Ministerial Order No.870: Child Safe Standards - managing the risk of child abuse in schools and the National Principles for Child Safe Organisations.
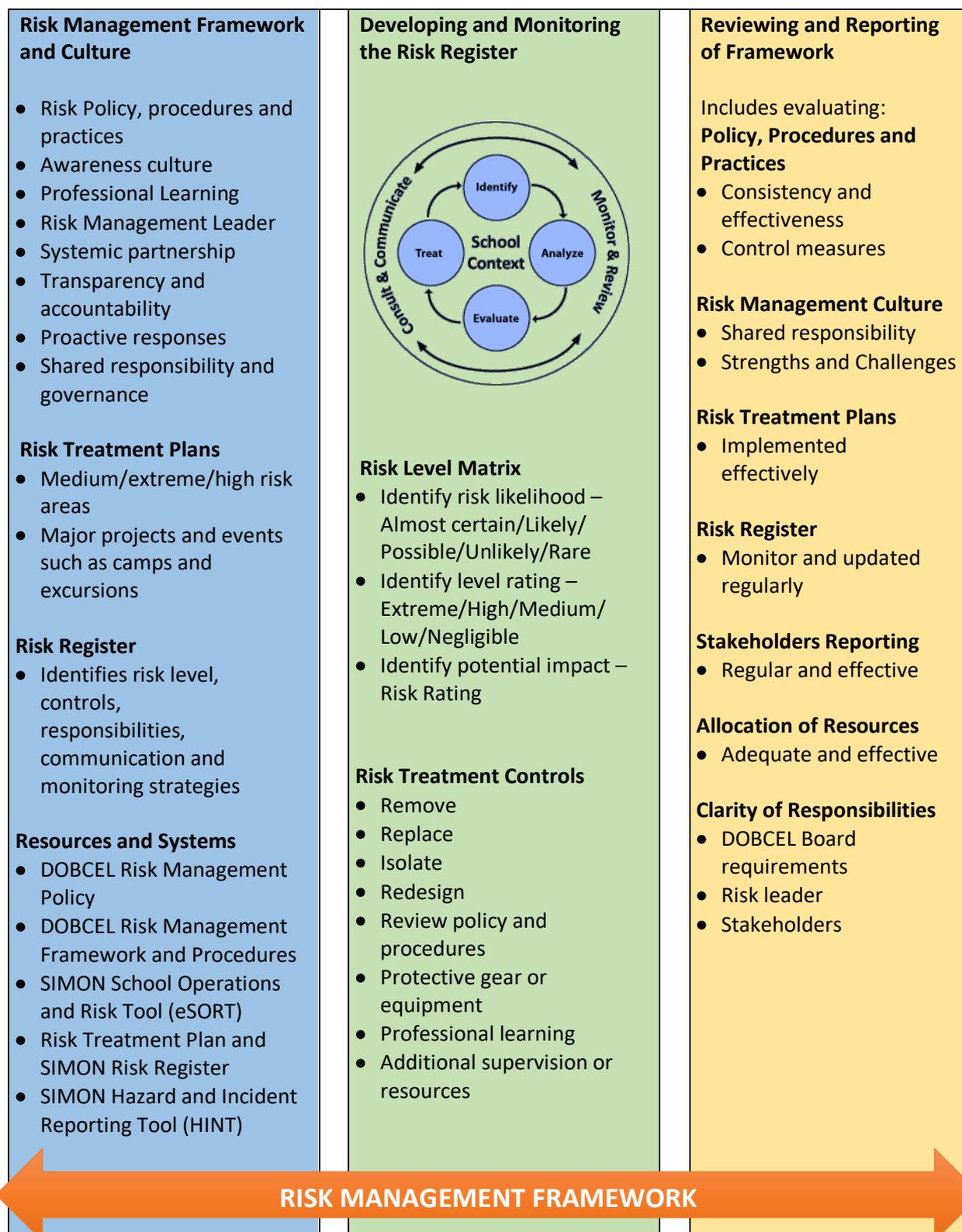
Goals of the Framework

Through implementation of the Framework, DOBCEL aims to:
- integrate risk management into the culture of the organisation and across all DOBCEL Schools
- embed risk management into all planning for education activities and business decision making processes including informing investment and resource allocation to assist in the delivery of outcomes
- ensure that systems are in place to track and report upon existing and emerging risks to the achievement of DOBCEL's objectives
- introduce a standardised approach to the management of risk across DOBCEL Schools
- increase understanding and awareness, provide guidance and clarify accountability and responsibilities in relation to risk
- provide simple guidelines for the development, implementation and management of risk at all levels within the organisation
- provide an appropriate process to give rigour to the risk attestation statement within DOBCEL's and schools' annual reports.

Elements of the Framework

The following diagram summarises the elements of the DOBCEL Risk Management Framework:

Diagram 1

Risk Management Framework and Culture

- Risk Policy, procedures and practices
- Awareness culture
- Professional Learning
- Risk Management Leader
- Systemic partnership
- Transparency and accountability
- Proactive responses
- Shared responsibility and governance

Risk Treatment Plans
- Medium/extreme/high risk areas
- Major projects and events such as camps and excursions

Risk Register
- Identifies risk level, controls, responsibilities, communication and monitoring strategies

Resources and Systems
- DOBCEL Risk Management Policy
- DOBCEL Risk Management Framework and Procedures
- SIMON School Operations and Risk Tool (eSORT)
- Risk Treatment Plan and SIMON Risk Register
- SIMON Hazard and Incident Reporting Tool (HINT)

Developing and Monitoring the Risk Register

Risk Level Matrix
- Identify risk likelihood – Almost certain/Likely/ Possible/Unlikely/Rare
- Identify level rating – Extreme/High/Medium/ Low/Negligible
- Identify potential impact – Risk Rating

Risk Treatment Controls
- Remove
- Replace
- Isolate
- Redesign
- Review policy and procedures
- Protective gear or equipment
- Professional learning
- Additional supervision or resources

Reviewing and Reporting of Framework

Includes evaluating:
Policy, Procedures and Practices
- Consistency and effectiveness
- Control measures

Risk Management Culture
- Shared responsibility
- Strengths and Challenges

Risk Treatment Plans
- Implemented effectively

Risk Register
- Monitor and updated regularly

Stakeholders Reporting
- Regular and effective

Allocation of Resources
- Adequate and effective

Clarity of Responsibilities
- DOBCEL Board requirements
- Risk leader
- Stakeholders

RISK MANAGEMENT FRAMEWORK

The DOBCEL Risk Management Framework includes the following elements:

1. An organisation-wide culture of and commitment to managing risk proactively, transparently, and co-responsibility
2. Roles and responsibilities for managing risk
3. Policies and Procedures to guide the work of DOBCEL Board, DOBCEL Management and DOBCEL Schools in identifying, minimising, and managing risk, especially in meeting the requirements of Ministerial Order 870 – Child safe standards
4. A commitment to training and continuous improvement
5. A systemic approach to risk management procedures and processes, risk treatment plans, reviewing and reporting risk at all levels of the organisation. DOBCEL Management has provided the following online tools:

   - An online schools operations and risk tool (eSORT) for DOBCEL. eSORT is available on SIMON and has a library of resources, including Guidelines to the Minimum Standards and Other Requirements for the Registration of Schools and DOBCEL Policies and Procedures (refer to **Appendix 1 – SIMON Schools Operations and Risk Tool (eSORT)**)
   - An online tool for recording and monitoring risks (Risk Register) for DOBCEL Board and DOBCEL Schools (refer to **Appendix 2 – SIMON Risk Register**)
   - An online tool for reporting and managing hazards and incidents (HINT) for DOBCEL Management and DOBCEL Schools (refer to **Appendix 3 – SIMON Hazard and Incident Reporting Tool (HINT)**)

6. Defining the risk appetite

1.   Developing a Risk Management Culture

Risk is defined as the effect of uncertainty on objectives (AS ISO 31000:2018). Uncertainty arises from internal and external factors which can influence the outcomes of organisational objectives. A risk is therefore the effect, positive or negative, of uncertainty on achieving the vision, organisational objectives and strategic directions of DOBCEL and DOBCEL Schools.

While risk management can be planned and developed according to the context of the company and individual schools, it is important to develop a risk management culture that responds as new risks arise. This can occur when implementing change such as new corporate, financial or educational strategies, equipment, and responding to workplace incidents (regardless of any injury). Regular monitoring of safety and the environment is essential in identifying new risks.

DOBCEL and all staff, including school staff, need to know the steps in commencing action to mitigate or eliminate a risk, including their responsibilities and whom to notify. Consultation with staff and community is a critical governance responsibility. This enhances the risk management culture through drawing on expertise, knowledge and ideas so that all potential risks and treatments are identified. It also assists with effective implementation of risk procedures, as there is greater understanding of how risk management works and builds confidence in the school community that risk is taken seriously.

In developing a risk management culture, policy, procedures and practices, the school community needs to be informed of its relationship to the Child Safe Standards.

Effective Risk Management Culture requires:

- collaboration through partnership between DOBCEL Board and each school
- sustained commitment from school leadership to risk management
- clarity of accountabilities, responsibilities, roles and decision-making processes
- strategic and ongoing communication and consultation
- strategic focus on improving learning outcomes within a safe environment
- commitment to accountability of diocesan and government requirements and community expectations
- forward thinking and proactive approach to stewardship
- management of risks and the anticipated benefits in all aspects of school operations
- contingency planning to prevent the school's vision and Catholic identity being undermined
- strategic process for assessing, monitoring and reporting risk
- shared responsibility for risk management by all in the school community.

2. Responsibilities for Managing Risk

As articulated in the DOBCEL Risk Management Policy, the DOBCEL Board has the ultimate responsibility for overseeing and monitoring the assessment and management of risk and compliance.

The following table outlines the process, roles and activities for monitoring, reviewing and reporting on risks between DOBCEL Board, Standing Committees, Management and Schools:

Who	Risk Management Framework responsibility	Frequency
DOBCEL Board	• Approve Executive Director Risk Management Report, Risk Register Summary and Hazard and Incident Summary reports and approve recommendations made by the ARFSC • Review Risk Management Framework, Policy and Procedures • Set the Risk Appetite	Quarterly Annually or as required Annually
Audit, Risk and Finance Standing Committee	• Escalate critical risks • Report and provide recommendations to the DOBCEL Board • Review and endorse Risk Management Framework, Policy and Procedures for Board approval • Review Hazard and Incident Detailed Report • Review of Risk Register Detailed Report • Review Executive Director Risk Management Report, including emerging risks, regulatory matters, changes in legislative or compliance requirements • Review and define the Risk Appetite • Review and endorse DOBCEL Financial Policies and Procedures for Board approval • Review and report on External Financial Audit Management Report	As required Quarterly Annually or as required Quarterly Quarterly Quarterly Annually Every two years or as required Annually
Who	Risk Management Framework responsibility	Frequency

Wellbeing and Safeguarding Standing Committee	• Review policies and procedures specific to the Wellbeing Framework and in relation to child safeguarding in accordance with Victorian Child Safe Standards as set out in Ministerial Order 870 and relevant child safety legislation	Every two years or as required
	• Oversee the operations of DOBCEL and monitoring of schools in relation to child safeguarding	Ongoing
	• Monitor areas of risk associated with wellbeing and child safeguarding	Ongoing
	• Escalate high risks to the Board	Quarterly or more frequently when required
	• Advise the Executive Director on areas of risk associated with wellbeing and child safeguarding that require support, intervention or oversight	As required
System Improvement Standing Committee	• Review policies and procedures specific to school improvement	Every two years or as required
	• Report to DOBCEL about the strategic directions of DOBCEL schools	
	• Review External School Reviewer Reports	Quarterly
	• Monitor areas of risk associated with school improvement	Ongoing
	• Escalate high risks to the Board	As required
	• Advise the Executive Director on areas of risk associated with school improvement that require support, intervention or oversight	As required
Enhancing Catholic Identity Standing Committee	• Review policies and procedures specific to Catholic Identity	Every two years or as required
	• Monitor areas of risk associated with Catholic Identity	Ongoing
	• Escalate high risks to the Board	As required
	• Advise the Executive Director on areas of risk associated with school Catholic Identity that require support, intervention or oversight	As required
Family and Community Engagement Standing Committee	• Review policies and procedures specific to Family and Community Engagement	Every two years or as required
	• Monitor areas of risk associated with Family and Community Engagement	Quarterly
	• Escalate high risks to the Board	As required
	• Advise the Executive Director on areas of risk associated with school Family and Community Engagement that require support, intervention or oversight	As required

Who	Risk Management Framework responsibility	Frequency
Executive Director	• Escalate high risks to the ARFSC and Board • Provide Executive Director Risk Management Report to Board and ARFSC • Provide Hazard and Incident Summary Reports to Board and Detailed Reports ARFSC • Provide Risk Register Summary Reports to Board and Detailed Reports ARFSC	As required Quarterly Quarterly Quarterly
DOBCEL Management	• Provide Risk Management Report to ARFSC • Review and update over-arching DOBCEL Risk Register • Facilitate risk management training for DOBCEL and school staff • Monitor Risk Management Treatment Plans • Liaise with the external provider on outcomes of audits and control reviews • Provide support for any new risk management matters or projects	Quarterly Quarterly Ongoing Quarterly Quarterly As required
DOBCEL Management and DOBCEL School Principals	• Manage and review risk register • Report Hazards and Incidents • Review Risk Appetite • Integrate risk management processes into existing business processes • Notify Executive Director/ARFSC of any changes in risk levels or new initiatives or projects that many expose DOBCEL Board to new risks	Quarterly Quarterly Annually Ongoing As required
Risk Management Partner/Advisor)	A third party review of the DOBCEL risk management policy and framework that covers: • Enterprise Risk Management review that provides a risk maturity rating at all levels of the organisation and recommended actions for improvement • Sample testing of nominated risks to understand the adequacy of controls to mitigate risks • Review of Risk Management Policy and Risk Framework and Procedures	At a minimum annually or otherwise as required

The DOBCEL Board assigns responsibility for the following risk categories:

Risk Category	Owned by	Managed by	Approach
Strategic risks Company or organisation wide risks - that affect longer term interest of DOBCEL or -overall strategic priorities or - require significant coordination across DOBCEL entities	DOBCEL Board	Board with support from DOBCEL Standing Committees and DOBCEL Management	Identified and owned by Board, who monitor the risk exposure and the status of controls and treatments and agree changes in risk exposure. Review of strategic risk informs strategic planning and resource prioritisation at system level. Activities to treat strategic risks are delegated to a member of DOBCEL Management with support from a DOBCEL Standing Committee to deliver. Risk treatment plans are actively monitored by nominated risk leaders and reported to the Board and/or Standing Committee each term.
DOBCEL Operational risks associated with DOBCEL Management and DOBCEL Schools Risks that - impact on the ability of schools, networks, clusters or office to deliver on day-to-day or service delivery objectives - are related to performance of a principal - are related to compliance or accountability	Executive Director	Executive Director with support from DOBCEL Management, System Leadership Directorate, in liaison with System Leadership Team, Stewardship and Principals	Identified and owned by the Executive Director, who is accountable for identifying, evaluating and managing operational risks and must ensure appropriate controls and/or treatment plans are implemented and reviewed. System Leadership Team Stewardship discuss and share their risks and escalate key operational risks to DOBCEL Management for review and to inform policy and resource prioritisation. Risk treatment plans are actively monitored by nominated risk leaders within DOBCEL Management.
DOBCEL Schools Operational risks associated with individual schools	Principal	Principal with support from School Leadership Team, School Compliance Officers, SAC and DOBCEL Management	Identified and owned by Principal, who is accountable for identifying, evaluating and managing operational risks and must ensure appropriate controls and/or treatment plans are implemented and reviewed. School Leadership Teams discuss and share their risks and escalate key operational risks to relevant member of the DOBCEL Management for review and to inform DOBCEL service provision. Risk treatment plans are actively monitored by nominated risk leaders within school and reported to the Principal each term.

Risk Category	Owned by	Managed by	Approach
Project and program risks that impact on achievement of individual project	Project and program managers	Project and program managers within the project management process	Project and program managers implement appropriate risk management processes to ensure the effective and efficient delivery of the project and prioritisation of project resources. While identifying project risks, they also understand and manage the risks necessary to achieve project objectives. Review of the risks to a project should be a standard agenda item for regular project team meetings, to ensure that decisions made are informed by the risks to the objectives.

3.   Policies and Procedures

The DOBCEL Board have developed Policies and Procedures to assist in minimising risk across the many areas of DOBCEL Management and DOBCEL School operations. The DOBCEL Board endorses polices for ratification by the Bishop/Member of DOBCEL. DOBCEL Management and DOBCEL Schools must implement DOBCEL Policies and Procedures as applicable to their activities.

4.   Training and Continuous Improvement

It is a requirement under the OHS Act 2004 to provide information, education and training to staff in the workplace on the identified hazards and risks. There are a number of ways of delivering this information including training sessions, briefings and signage. DOBCEL Management and each DOBCEL School is responsible for:

- identifying, reporting and responding to actual and potential hazards
- implementing a risk management program that involves regular workplace safety briefings, audits, inspections and an analysis of identified hazards and incident reports as well as Safe Operating Procedures (SOP)
- consulting with Health and Safety Representatives, School Leaders and DOBCEL Management and others to identity potential hazards, assess the risks and implement risk control measures
- providing SOP's and installing safety switches, safety equipment and signage to inform staff on how to reduce the risk of an injury or asset/property/environmental damage or loss occurring.

On-line training is required to be completed by all DOBCEL staff, this includes the *(Non-Government Schools) Protecting Children - Mandatory Reporting and other Obligation*s and this training is currently completed online using the *ELMO Software Ltd* platform and is managed by the DOBCEL People and Development Team for all DOBCEL employees. The Mandatory Reporting online training program is undertaken during Term 1 each year and on commencement of employment.

DOBCEL Management provides an online Catholic Education Ballarat Learning Manager. Refer to Appendix 4.

5. Risk Management Procedures and Processes

DOBCEL Board aims to deliver a simple and effective seven step risk management process as outlined in the ISO31000 (2018):

5.1 Establishing the context

5.2 Identify the risk

5.3 Analyse the risk

5.4 Evaluate the risk

5.5 Treat the risk

5.6 Monitor, review and report the risk

5.7 Communication and consultation
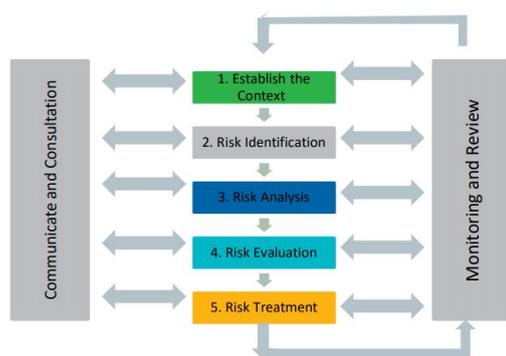
5.1 Establishing the context

This activity consists of defining the scope for the risk management process, defining DOBCEL's objectives, and establishing the risk evaluation criteria. The context comprises both external elements (regulatory environment, market conditions, school and parent expectations) and internal elements (DOBCEL's governance, culture, standards and rules, capabilities, existing contracts, employee expectations, information systems, etc).

Risk Management and the School Environment

Risk management at all times must take into account and be consistent with the requirements of the Ministerial Order No 870, which specifies the requirements for schools regarding the Child Safe Standards. It has also defined what constitutes the school environment and this applies throughout these procedures.

The **school environment** means any physical or virtual place made available or authorised by the DOBCEL Board for use by a child or school staff during or outside school hours, including:

- a campus of a school
- online school environments (including email and intranet systems)
- other locations provided by the school for the child's use (including, without limitation, location used school camps, sporting events, excursions, competitions and other events
- home offices of school staff

In addition, the school environment includes arrangements with other Australian or overseas schools, such as engaging in cultural visits through sister school arrangements or exchange programs. This may involve visiting students to the school or the school's students going to another school. Schools need to ensure effective risk management controls are consistent with the Child Safe Standards. This also applies to schools that have fee paying international students and this may extend to their living arrangements.

Each school is supported to consider its own context and processes already in place to manage risk, with due consideration to:

- commitment to ensuring processes are formalised according to DOBCEL policy, communicated and adequately resourced. It is not seen just as a compliance process but rather an important strategy in supporting school improvement and effective stewardship
- professional learning and training is undertaken to ensure risk management is understood and permeates all levels of governance and the school community
- identification of a risk management leader or compliance officer
- development or refinement of a risk management policy, procedures and practices that include:
  o identification of key stakeholders and responsibilities
  o processes for identifying risks and treatment (controls)
  o risk level matrix
  o process for monitoring and review
  o processes for consultation, communication and reporting

The school will also consider what *critical success factors* (CSFs) are required for the school context, such as:
- embedding a risk-aware culture throughout the school
- acknowledging that factors will arise that threaten an event or decision
- training is provided to staff and as part of induction
- communicating policy and procedures to the whole community
- engaging all staff and students on risk and risk treatment/controls
- ensuring that adequate records are kept and regular reviews are conducted in the management of the risk register and its implementation
- allocating time for the risk management leader to monitor and review the framework
- informing DOBCEL in relation to the implementation of the framework
- escalating risks that cannot be managed effectively at the school level to the relevant member of DOBCEL Management

5.2   Identify the Risk

This step requires identifying what could prevent DOBCEL from achieving its objectives. In developing the DOBCEL Risk Register, DOBCEL Board has identified certain risks that all schools are exposed to and Principals must manage these particular operating risks. The SIMON Risk Register, a platform in use at all DOBCEL schools, enables schools to update their school Risk Register with risks that are specific to their context and environment.

Types of Risks

The DOBCEL Board has categorised risks into the following types:

- Child Safety: Risks relating to the wellbeing and safety of all children and young people. These risks must be at the forefront of all we do and every decision we make
- Financial: Risks relating to the management of DOBCEL and DOBCEL Schools' finances and finance processes (payments, budgeting, fraud, reporting, etc.)
- Health & Safety: Risks relating to the management of the physical work environment and its impact on staff/visitor health (injuries, illness, accidents, emergency plans, etc.)
- People & Capability: Risks relating to availability of adequately skilled staff as well as the actions/inactions of staff and the management of HR processes
- Information Technology: Risks relating to the systems, software, processes and information/data required by, produced or relied upon by DOBCEL and DOBCEL Schools in the execution of its activities
- Legal & Regulatory: Risks relating to performance/non-performance and changes to the legislative and regulatory environment within which DOBCEL and DOBCEL Schools operate
- Operational: Risks relating to the disruption of DOBCEL and DOBCEL Schools work processes and service delivery
- Strategic: Risks relating to the overall strategic direction and governance of DOBCEL and DOBCEL Schools, taking account of external factors in the macro-environment (includes: governance, changes in organisational focus, reputational market and demographic changes)
- Student Outcomes: Risks relating to educational outcomes for students

5.3   Analyse the risk

This step involves understanding the sources and causes of the identified risks; determining the likelihood and consequence of the risk eventuating given the existing controls, to identify the level of residual risk.

Assessing the Risk

Each risk needs to be assigned a '*Risk Rating*' that represents the degree of risk. The rating is determined by using the risk assessment model below.

Risk Assessment Model

The following model is used to identify the '*Inherent*' risk rating and '*Residual'* Risk Rating for each risk. This is essential to demonstrate how the risk control measures will reduce the level of risk.

Determine Likelihood – what is the possibility that an injury will occur?

Level	Descriptor	Example
5	Almost certain	Expected to occur, multiple times in a year, greater than 95% chance
4	Likely	Probably will occur (no surprise) at least once in the next year, 66 – 95% chance
3	Possible	May occur at some time, once in the next 3 years, between 26 – 65% chance
2	Unlikely	Would be surprising if it occurred, once in the next 5 years, between 5 – 25% chance
1	Rare	May never occur, once in the next 10 years, less than 5% chance

Determine Consequence – what will be the most likely extent of the risk be?

Level	Descriptor	DOBCEL Consequence Rating
1	Minimal	
2	Minor	DOBCEL has established the consequence rating for each DOBCEL risk category. Refer to **Appendix 5 - Consequence Ratings**
3	Moderate	
4	Major	
5	Severe	

Use the Risk Matrix to determine the Risk Rating

Likelihood	Consequences				
	Minimal 1	Minor 2	Moderate 3	Major 4	Severe 5
5 (almost certain)	M	H	H	E	E
4 (likely)	L	M	H	H	E
3 (possible)	L	L	M	H	H
2 (unlikely)	N	L	L	M	H
1 (rare)	N	N	L	L	M

Considerations in assessing the likelihood and consequence (impact) include:
- competence, experience and qualifications of staff leading an activity or project
- levels of supervision required
- modes of transport
- environmental factors
- duration or frequency of exposure to hazard such as sun exposure
- individual and student cohort factors
- safety, wellbeing and student outcomes
- professional learning required
- communication of policies
- 'hot spots' and 'hot times'
- Control effectiveness rating (see below table).

Below is the control effectiveness table:

CONTROL EFFECTIVENESS RATING	CRITERIA
Fully effective	• Risk is being managed effectively, controls are well designed and address root cause • Only requires monitoring and review of existing controls • Controls are effective and reliable at all times
Substantially effective	• Most risk controls are designed correctly and are effective • Some existing risk controls require more work to improve operating effectiveness • There are some concerns about the effectiveness and reliability of some controls
Partially effective	• Risk controls are designed correctly by addressing root cause, but are not very effective • Some controls are not well designed, do not treat root cause or there is too great a reliance on reactive controls • Not enough of the controls are effective or reliable
Largely ineffective	• Insufficient risk controls • Risk controls, if they exist, are reactive • Risk controls do not treat the root cause or do not operate effectively • Controls require significant improvement or replacement
None or totally ineffective	• No reliable risk controls are in place or available • There is no confidence in the risk controls

5.4   Evaluate the risk (Impact)

This step is achieved by comparing risk analysis results with risk criteria to determine whether the residual risk is tolerable. Priorities for action will be determined through a process of consultation with the school community and/or staff, and will include consideration of all information available.

The Risk Priority Table below provides examples of actions and timeframe. For risks with a low or negligible risk rating, taking into consideration controls already in place, no immediate further treatments may be required, however they should be monitored.

Level of Risk	Response to Risk
Extreme	Unacceptable level of risk exposure that requires urgent and immediate corrective action by the Principal, Executive Director and escalate to the ARFSC Standing Committee and DOBCEL Board.
High	Action required to mitigate/reduce/control the risk urgently. Re-organise, change location or defer activity as soon as possible, whilst introducing more immediate temporary measures. Immediate temporary measures to reduce the risk should be developed within a week. Escalate to the Executive Director, ARFSC Standing Committee and DOBCEL Board.
Medium	Acceptable level of risk exposure but requires regular and active monitoring by <insert who this should be – Principal/Risk Leader etc.> Consult with staff, volunteers and/or students to identify solutions and a timeline for any additional controls that may be necessary. Short-term actions should be completed within 2 weeks.
Low	Acceptable level of risk. No additional controls are required but existing controls should be reviewed to ensure adequacy - consult with staff, volunteers and/or students to identify any further improvements. Short terms actions should be completed within 28 days.
Negligible	Acceptable level of risk no further action required, monitor to ensure the risk remains negligible.

5.5   Treat the Risk

This step involves changing the magnitude and likelihood of consequences, both positive and negative, to achieve a net increase in benefit. The assessed risk level determines the degree of the treatments to minimise the potential risks including the regularity of the monitoring and review. In applying risk treatments (controls), the following should be considered:
- remove - remove hazard
- replace - replace with a lesser risk
- isolation - create a barrier to access
- redesign - consider an alternative way of doing the activity or process
- policy and procedure - review policy or procedures to address or mitigate the risk
- professional learning - prioritise long and short term requirements
- protective gear or equipment - provide as necessary
- additional supervision or resources
- abandon/suspend activity - risk unacceptable

Developing Risk Treatment Plans

A separate risk treatment plan will be developed for risks that have been identified as having a medium-high number of controls. Schools must conduct a risk assessment and develop a risk treatment plan for major projects, activities and events such as:

- camps and excursions
- fetes
- working bees
- building and renovation projects
- major purchases of capital

A risk treatment plan provides details to address the operational measures to minimise or eliminate risk for a specific activity and can be incorporated into school planning sheets for activities such as a school camp. This assists in communication with all staff involved in the activity and outlines any required controls, actions and responsibilities that will be important to ensure a safe environment. The risk management assessment for the activity is usually entered on the risk register as part of the process. It includes sections for:

- risk owner
- description of risk
- controls and actions to mitigate risk
- resources required
- responsibilities and task owner
- monitoring and reporting

5.6   Monitor, Review and Report the Risk

This task consists of measuring risk management performance against indicators, which are periodically reviewed for appropriateness. It involves checking for deviations from the risk management plan, checking whether the risk management framework, policy and plan are still appropriate given DOBCEL's external and internal context, reporting on risk, progress with the risk management plan and how well the risk management policy is being followed, and reviewing the effectiveness of the risk management framework.

Risk assessments will be reviewed when:

- an incident occurs or there is evidence that the risk assessment is no longer valid
- there are significant changes to workplace activities, services and goods supplied

To give assurance at all governing levels that risks are being managed, the Executive Director will provide the following DOBCEL and School reports to the DOBCEL Board, DOBCEL Audit, Risk & Finance Committee (ARFSC) and DOBCEL Management:

- Hazard and Incident Reports (Trends / Root cause Analysis)
- Risk Register Status (Highlight any movements in risk ratings from previous report)
- Executive Director Risk Management Report: Emerging risks/Regulatory matters/Changes in legislative or compliance requirements
- Notifications to any Regulators
- Summary of any findings around Internal/External audits carried out

For further detailed reporting and assurances that each level provides refer to section 2.

5.7 Communication and Consultation

This task helps understand the DOBCEL Board, DOBCEL Management and DOBCEL Schools' interests and concerns, to check that the risk management process is focusing on the right elements, and also helps explain the rationale for decisions and for particular risk treatment options.

6. Risk Appetite

The DOBCEL Board has defined areas in which schools should have a low appetite for risk. These areas are:

- health, safety, protection and wellbeing of staff, students and school community
- administration of finances and resources
- compliance, statutory, organisational and governance requirements.

Specifically, for any risks associated to child safety (as defined in the Child Safe Standards) there is zero tolerance for any risk.

The DOBCEL Board identifies that that there is potential for a higher appetite for risks in the areas of change and innovation such as a new learning and teaching approach or organizational structure. It identifies that not all risk management is focused on adverse risk. It also acknowledges the importance of managing positive opportunities for change, innovation and research that are known, and those that become known, through implementing a risk management framework.

Definitions

Child abuse includes—

- any act committed against a child involving—
  - a sexual offence or
  - an offence under section 49B(2) of the Crimes Act 1958 (grooming)
- the infliction, on a child, of—
  - physical violence or
  - serious emotional or psychological harm
  - serious neglect of a child.

Child safety - encompasses matters related to protecting all children from child abuse, managing the risk of child abuse, providing support to a child at risk of child abuse, and responding to incidents or allegations of child abuse (in relation to the Child Safe Standards).

Risk - is *the effect of uncertainty on objectives which can be* a negative or positive effect that can arise from the implementation of business, financial or other practices that affect the operations of the company or schools and the education community. Risks occur due to the unplanned uncertainty in carrying out the operations of the education community.

Risk management - a coordinated approach to identifying risks that may occur in the organisation and stewardship of education. Risk management recognizes that there is always an element of risk in the operations related to the delivery of education and, with that, there is a governance responsibility to have policy and processes to mitigate potential risks.

Risk management framework - includes the risk management policy and procedures, resources and communication in managing risk within the education organisation.

Risk appetite - the amount and type of risk that an organisation is willing to take in order to meet their strategic objectives.

Risk management plan - provides a detailed plan to manage risk and is required for extreme or high level risks

Risk owner - person within the governance structure that is responsible for managing an identified risk

Risk level rating - provides an overall rating taking into account impact (likelihood and consequence) of the risk. The ratings are extreme (E), high (H), medium (M), low (L), Negligible (N).

Risk treatments - measures or controls put in place to modify risk

Risk register - a log that lists the identified risks, risk levels, treatments, risk owner and review dates

Stakeholders - includes internal and external stakeholders to the organisation. Stakeholders can determine or impact on a risk.

School environment - includes every school related activity and extends beyond the school grounds and outside school hours. This includes any physical or virtual place made available or authorised by DOBCEL for use by a child or outside of school hours, including a campus of a school, online school environments, and other locations provided by the school for a child's use , such as school camps and excursions.

School staff is defined as any individual working in a school environment who is directly engaged or employed by DOBCEL, a volunteer or a contracted service provider (whether or not a body corporate or any other person is an intermediary) and a minister of religion

Task owner - the person designated to ensure that specific actions are put in place in a risk treatment plan

Appendix 1 - SIMON Schools Operations and Risk Tool (eSORT)

DOBCEL Management has developed a Schools Operations and Risk Tool (eSORT) as an electronic document and risk management system. eSORT assists in managing and storing relevant documents to meet compliance, statutory, organisational and governance requirements around risk. It also assists in the process of managing potential risks.

Compliance and statutory requirements – relate to the legislative requirements and process that is used in monitoring and validating specific compliance in all Victorian schools. The Victorian Registrations and Qualifications Authority (VRQA) defines a series of minimum standards for registration of schools.

Organisational and governance requirements – include DOBCEL and school requirements that are cognisant of Catholic tradition and teaching, effective educational practice and legal requirements for a Catholic educational provider and workplace. From time-to-time, DOBCEL policy may set standards for effective practice beyond those stipulated for meeting compliance and statutory obligations.

Evidence pertaining to these elements of regulatory control is mostly in the form of documented policies, statements, declarations, certificates, procedures, rules, registers, plans, or program descriptions. These compliance areas also become a basis for risk management. Each component of our operational management can relate to inherent risks (negative and positive) associated with managing and implementing the requirements.

DOBCEL employees maintain the **resource library** on a regular basis. The information on eSORT is intended to provide Minimum Standards and general risk management advice to DOBCEL Schools. With changes to regulatory or legislative requirements, the updating of documents will only occur following endorsement by DOBCEL Management. The Library menus all focus around resources that relate to Policy, Procedures, and Practices (PPPs). It is a place where resources can be listed and grouped in a central place and in a consistent way. There are remote resources and local resources displayed with a common grouping model. DOBCEL Schools must use the eSORT module within SIMON to house and manage school documents related to governance and compliance.

Notifications are a vehicle for DOBCEL Management to notify schools of key information related to operations, compliance and risk.

Key points:

• Created in eSORT CEB admin

• Various types of notification can include:
   o general information on an update or change to a policy or other types of news and updates
   o responding to a checklist of questions which will assist in a policy review
   o responding in the form of policy evidence
   o assisting schools in archiving policy documents
   o producing reports for schools (i.e. VRQA)

• eSORT users receive an email and an alert will appear in SIMON when a notification has been sent

The notifications area consists of three main tabs and is similar to a mail client for emails. The 'Inbox' tab is where unread, or incomplete notifications appear, those that have been read and/or complete move to the 'Archive' tab and finally those notifications that required responses and submission and have been completed, will be listed in the 'Reports' tab.

Appendix 2 - SIMON Risk Register

All DOBCEL Schools will utilise the online SIMON Risk Register, which provides a tool for identifying, analysing, evaluating and treating risk. The following diagram (Diagram 2) illustrates the risk cycle. Any risk analysis takes into account legislation, organisational and governance requirements and duty of care to take reasonable precaution to avoid foreseeable risks.

Diagram 2
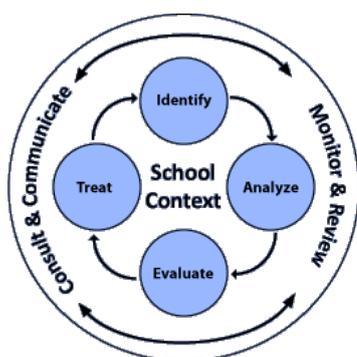
The SIMON Risk Register provides an overall assessment of risks and measures to minimise or eliminate risks. It records the following details:
- activity and risk description
- pre-mitigation assessment - the current risk status including current controls, consequence, likelihood and current risk level rating
- a post-mitigation assessment (to be developed) - what new controls have been put in place and the new risk level rating (which would usually be lower that the pre-mitigation assessment)
- accountabilities - indicating the risk owner and task owner
- monitoring and communication strategies
- review date

SIMON currently exists in all schools and this addition enhances its credentials as a one stop shop for schools with the added advantage of being able to control the development and any changes required to suit our application across schools and DOBCEL, whilst also providing an opportunity to produce consolidated data reports.

The development of the SIMON Risk Register has been divided into the following phases of development:
- Phase 1: Establishment of Basic Risk Register (completed)
- Phase 2: Transition of existing DOBCEL Risk Register into the new SIMON Risk Register (completed)
- Phase 3: Identification and creation of mandatory school risks to be pre-loaded into school register prior to release (completed)
- Phase 4: Provision of consolidated reporting on all risk registers (in progress)

Appendix 3 - SIMON Hazard and Incident and Notification Tool (HINT)

When an incident occurs in the workplace that causes, or has the potential to cause, injury, ill health, damage or other loss, DOBCEL needs a way to collect and record information about the incident. DOBCEL Management have developed an online Hazard and Incident Notification Tool (HINT) accessible through SIMON. HINT can be used to record critical information including what happened, when it happened, who was involved and the extent of any injuries or damage.

The development of the SIMON HINT has been divided into the following phases of development:

Stage 1: Incident/hazard report - nature of report & reporting person details

Stage 2: Investigation (only to be completed if injury is classified 'serious' and 'work/school related')

Stage 3: Corrective actions to be taken to reduce risk of recurrence (to be completed by the school principal / DOBCEL manager or their nominee)

Stage 4: Review of actions (to be completed by OHS Coordinator or Properties and Facilities Officer)

The HINT tool will be used to provide data and reporting that can then inform future training in identified areas for improvement, benchmarking risks and informing the Risk Register.

Definition and categorisations of an incident

Below are definitions for the HINT and are to be used as guidance for users entering data into the system:

- Hazard: a source of potential harm to health and safety
- Near miss: an incident which does not cause injury or damage but had the potential to do so
- Incident: any unplanned event resulting in, or having a potential for injury, ill health, damage or other loss (ISO 45001:2018)

This system will provide detailed and summary reports of all hazards and incidents that are recorded, as required to school leadership and DOBCEL Board and Standing Committees.

Appendix 4 – Catholic Education Ballarat Learning Manager

The Learning Manager provides web-based learning for all DOBCEL staff with a greater variety of online training so that staff can be trained no matter where people are located. This extensive range of courses are aimed to up-skill employees, help them understand their obligations and help minimise risk and to comply with the requirements of various Act's and Codes of Practice relevant to the education sector.

The Learning Manager modules are accessible to all staff through the menu bar on SIMON by selecting CEB Resource Links. For new staff that are required to be enrolled, school administration staff need to contact the DOBCEL Compliance & Risk Advisor to enrol them. Managing the training of DOBCEL staff is intended to be quite simple, as all staff who were employed before April 2020 have already been pre-enrolled into each of the following 13 courses:

- Work Health Safety & Education
- Sexual Harassment
- Harassment and Bullying
- Anti-discrimination
- Information Security
- Safeguarding Essentials
- Driver Safety Awareness
- Ergonomics & Manual Handling
- Privacy
- Due Diligence for Officers
- Camps and Excursions
- Preparing for fire and other emergencies
- Essentials of Whistleblowing
- Modern Anti-slavery

Upon successful completion of a course staff will be provided with a certificate. A copy of the certificate should be given to the relevant administration person at each school to maintain records and to monitor who has completed or may be outstanding in completing the required course.

At present the Catholic Education Ballarat Learning Manager is managed by Business Services – Planning, Facilities and Risk Team (DOBCEL Compliance & Risk Advisor is the Administrator). Schools are able to manage the process themselves if they choose to and roll out specific courses to their staff.

Appendix 5 – DOBCEL School Consequence Ratings

Category	Levels				
	Severe (5)	Major (4)	Moderate (3)	Minor (2)	Minimal (1)
Child Safety	• Major non-compliance with Ministerial Order 870 resulting in suspension of registration from regulatory authority. • Failure to protect children and young people resulting in criminal convictions, civil action and/or removal of registration of school. • Significant legal / reputational / financial impact	• Ongoing non-compliance Ministerial Order 870 resulting in warning from regulatory authority. • Substantiated findings of Reportable Conduct and/or serious misconduct against a staff member(s) • Legal / reputational / financial impact	• Failure to act following a notification of non-compliance with Ministerial Order 870. • Substantiated findings of Reportable Conduct and/or misconduct against a staff member(s). • Minor or no regulatory or legal sanctions, minor or no financial impact.	• Notification of non-compliance with Ministerial Order 870. • Allegation of Reportable Conduct or misconduct against an individual staff member.	• Allegation of noncompliance with Ministerial Order 870. • Internally identified minor non-conformance
Financial	• Loss of key assets • >15 % deviation from budget • High value fraud committed • Significant legal / reputational / financial impact	• Loss of significant assets • 6% - 15% deviation from budget • External audit qualification on accounts • High end fraud committed • Legal / reputational / financial impact	• Loss of minor assets • 2% - 5% deviation from budget • External audit management letter adverse comments • Minor or no regulatory or legal sanctions, minor or no financial impact	• Loss of 'consumable' assets, • < 2% deviation from budget • Low value fraud committed	• Small loss that can be absorbed
Health and Safety	• Fatality or permanent disability • Stress / trauma event requiring extensive clinical support for multiple individuals • Significant legal / reputational / financial impact	• Injury / ill health requiring inpatient hospital admission • Stress / trauma event requiring ongoing clinical support • Legal / reputational / financial impact	Injury / ill health requiring external medical attention • Stress / trauma event requiring professional support • Minor or no regulatory or legal sanctions, minor or no financial impact	• Injury / ill health requiring one visit to doctor • Peer support for stress / trauma event	• Minor injury requiring first aid or peer support for stress / trauma event
Information Technology	• Normal school operations cease • Significant legal / reputational / financial impact	• Whole of school operations disrupted • Assistance sought from CEB • School not able to use digital platforms • Legal / reputational / financial impact	• Key school operations temporarily disrupted • School leadership team meets to return school to normal operations • Minor or no regulatory or legal sanctions, minor or no financial impact	Some school operations disrupted • Minor workarounds return school to normal operations	• School operations continue with slight interruptions to normal activities.

DOBCEL School Consequence Ratings

Category	Levels				
	Severe (5)	**Major (4)**	**Moderate (3)**	**Minor (2)**	**Minimal (1)**
Legal & Regulatory	• Multiple severe non-conformance resulting in loss of key license or accreditation • Significant legal / reputational / financial impact	• Major enforceable undertaking resulting in suspensions or conditional licences. • Legal / reputational / financial impact	• Moderate enforceable resulting in suspensions or conditional licences • Minor or no regulatory or legal sanctions, minor or no financial impact	• Minor enforceable undertaking and/or additional reporting without sanction applied	• Internally identified minor non-conformance • Can be resolved internally
Operational	• Unsatisfactory outcome of service delivery • School not able to function • Major disruption to student learning • Significant legal / reputational / financial impact	• Evidence of significant variation in expectations and outcomes of service delivery • Change in timelines • Disruption to wellbeing and work processes • Remote learning and working arrangements required • Legal / reputational / financial impact	• Expected processes and procedures not always being met • Discussion with contractor required to resolve issues • Timelines need slight adjustment • Disruption of service having moderate impact on wellbeing and work processes • Minor or no regulatory or legal sanctions, minor or no financial impact	• Minor misunderstanding of expectations • Some readjustment of outcomes of service delivery • Minor wellbeing issues arise and can be addressed easily	• Minor alteration of expected service delivery • Little or no impact
People & Capability	• Critical failure(s) preventing core operations from being performed • Significant legal / reputational / financial impact • School closure due to inability to fulfil principal leadership position	• Significant impact arising from failure to provide critical training, resources or equipment impacting core operations • Serious misconduct, wilful breach of policy or legislation or behaviour that places others at serious & genuine risk, industrial action may be taken • Student outcomes affected by frequent changes to principal or other leadership positions • Legal / reputational / financial impact	Impact on operational effectiveness such that targets are not met and/or there is significant impost on other people, resources/systems. • Repeated Unsatisfactory performance or behaviour despite prior intervention, may place others at risk, impact on employee morale or core operations. • Formal intervention required. • Leadership position is managed but results in some changes to school organisation and with effect on educational program	• Minor and brief impact on work activities arising from a lack of training or resources required or continued inappropriate behaviour or under performance • The impact can be addressed at the local level with intervention • Some disruption or uncertainty regarding leadership position that may impact on community confidence in school	• Minimal impact on some work activities arising from a delay in training or resources, inappropriate behaviour, or under performance • The impact can be addressed through routine management • Minor disruption of leadership position

DOBCEL School Consequence Ratings

Category	Levels				
	Severe (5)	**Major (4)**	**Moderate (3)**	**Minor (2)**	**Minimal (1)**
Strategic	• Little or no evidence of the school having a lived Catholic identity in all its functions • Parish and community connections are minor or only enacted when necessary • Pending school closure • Unable to meet eligible enrolment requests	• Significant drop in families and staff valuing the importance of Catholic identity • Parish and school connections are limited to sacrament program • Increasingly not being able to meet eligible enrolment requests	• Professional learning not building capacity of all staff in strengthening Catholic identity across the curriculum • School is involved with parish and school but not always as partners • Not able to meet slight growth in enrolment requests (in given year)	• Low percentage of staff and families not valuing the importance of Catholic identity in the life of the school	• Some questioning of staff and families in the value of being a Catholic school • Some aspects of Catholic identity in the life of the school require minor strengthening • The purpose of some Parish and community connections need to be reviewed for effectiveness
Student Outcomes	• Significant evidence of Literacy and Numeracy decline • Significant evidence of unsatisfactory student engagement and connectedness to the school and their peers • Significant evidence that there are no options for student pathways • Significant evidence that transition programs are effecting school enrolments	• Major evidence of Literacy and Numeracy decline • Major evidence of unsatisfactory student engagement and connectedness to the school and their peers • Major evidence that there are no options for student pathways • Major evidence that transition programs are effecting school enrolments	• Moderate evidence of Literacy and Numeracy decline • Moderate evidence of unsatisfactory student engagement and connectedness to the school and their peers • Moderate evidence that there are no options for student pathways • Moderate evidence that transition programs are effecting school enrolments	• Minor evidence of Literacy and Numeracy decline • Minor evidence of unsatisfactory student engagement and connectedness to the school and their peers • Minor evidence that there are no options for student pathways • Minor evidence that transition programs are effecting school enrolments	• Minimal evidence of Literacy and Numeracy decline • Minimal evidence of unsatisfactory student engagement and connectedness to the school and their peers • Minimal evidence that there are no options for student pathways • Minimal evidence that transition programs are effecting school enrolments