



# NORTHERN DISTRICTS GYMNASTIC CLUB

## RISK MANAGEMENT POLICY

**Policy title:** Risk Management Policy

**Responsible Officer/Department:** Management

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## 1.0 Document History

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### Document Location

This document is valid on the day it was printed and can be found on the NDGC website, in reception and within the policies and procedures folder.

### Revision History

Version	Author	Date	Approved By	Approval Date	Review Date
1	Child Safeguard	14/01/2022	Ben Barnard	14/01/2022	July 2022
2	Ben Barnard	23/09/2022	Ben Barnard	23/09/2022	July 2023

## 2.0 Risk Management at NDGC

Child Safe Organisations improve safety by analysing and addressing risks, reducing opportunities for harm and increasing the likelihood of perpetrators being caught.

NDGC recognises the increased risk associated with specific roles and activities, particularly in situations where staff members are working in one-on-one situations with children unsupervised.

NDGC staff are required to evaluate a task or job in advance of completing it and assess the risks. This evaluation should focus on whether the task or job has the potential to cause harm to children and young people.

### Situational Prevention Approach

NDGC adopts a situational prevention approach to risk management, underpinned by the following principles:

- Addressing uncertainty through a systematic, structured and timely approach
- Taking into account human and cultural factors
- Being transparent, inclusive and responsive to change.

### 3.0 Establishing the Context

Prior to undertaking the risk management procedure, it is important to consider the context of your organisation, the different environments of operation, as well as the types of activities and programs provided.

NDGC ensures that information about risks and their management strategies are reported to be used as a basis for all decision making. Throughout the risk management procedure, it is important to ensure continuous:

- 1. Communication and Consultation** with all stakeholders involved, including staff, families, children and young people (where appropriate) to ensure that all possible risks are identified, and that effective and practical management procedures are in place.
- 2. Monitoring and Review** of the strategies that have been implemented. Ensure that the strategies are practical and effective for day-to-day use. Adopt continuous review procedures to ensure the strategies remain up to date and relevant to reduce appropriate risks.

## 4.0 Reporting Risks

How to complete a risk assessment:



### Identify the Risk

- Is it related to Child Safety and risks of harm and abuse?



### Assess the Risk

- What is likelihood that the risk will occur?
- How severe are the potential consequences?



### Control the Risk

- What strategies can be implemented to minimise the risk?
- Are the options practicable?



### Document the Process

- Has a risk assessment been completed?
- Have the stages of risk assessment been recorded?



### Monitor and Review

- Is the assessment process subject to constant monitor and review?
- Are the implemented strategies and processes subject to review?

## 4.1. Stage 1 - Identification

It is important to be aware of risks which may cause harm. It is everyone's responsibility to ensure that an identified risk is reported. There are various risks which occur in different environments.

To identify risks in the physical environment, consideration should be given to the following areas:

- The source of the risk
- The area of impact
- The events that may cause the risk
- The causes of the risk
- The consequences of the risk.

### Identifying Child Abuse Risks – Physical Environment

The table below provides types of child safety risks that children may be exposed to. NDGC and its staff should be aware of the following risks and understand how to identify the risks at the facility.

RISKS TO CHILDREN			
Physical Abuse	Neglect	Psychological Abuse	Sexual Abuse
<ul style="list-style-type: none"> <li>• Pushing, hitting, kicking</li> <li>• Physical punishments</li> <li>• Rough handling</li> </ul>	<ul style="list-style-type: none"> <li>• Poor supervision</li> <li>• Children become lost or go missing</li> <li>• Lack of adequate food, shelter or clothing</li> </ul>	<ul style="list-style-type: none"> <li>• Isolation from others</li> <li>• Verbal aggression</li> <li>• Intimidation and controlling behaviour</li> <li>• Lack of positive and nurturing engagement</li> </ul>	<ul style="list-style-type: none"> <li>• Grooming behaviour</li> <li>• Inappropriate touching</li> <li>• Inappropriate conversations of a sexual nature</li> <li>• Crossing professional boundaries</li> </ul>

## Identifying Child Abuse Risks – Online Environment

The online environment increases opportunities for children to learn, interact and communicate with little to no supervision. Organisations that provide services to children have a responsibility to ensure that where children participate online, they are protected from online child safety risks.

Online child safety risks may include (but are not limited to):

- 1. Cyberbullying:** When technology is used to send hurtful messages, pictures or comments to someone.
- 2. Online Grooming:** When an adult uses electronic communications to establish a personal connection with a child, in order to prepare the child for sexual abuse.
- 3. Non-consensual sharing of images:** This involves uploading and sharing images of a person without their consent.
- 4. Image based abuse:** This can involve the exposure to violent material, sexual content or pornography.
- 5. Exposure to inappropriate content:** This may include exposure to sexually explicit material, violent, offensive or hateful material.

### 4.2. Stage 2 - Assessment of the Risk

When a potential risk is identified, management staff are responsible for:

- Assessing the risk of injury
- Evaluating the potential consequences, exposure and probability of each identified risk
- Assigning an appropriate risk-level.

*Refer to the Consequence and Likelihood tables overleaf.*

## Consequence & Likelihood

Once the Risk Tolerance has been established, staff should consider the possible consequences and how likely it is that the consequences will occur, as a result of the exposure to the risk.

Consequence Table		
Category	Consequence	Description
1	Insignificant	<ul style="list-style-type: none"> <li>Minor injury, altercation or mishap</li> <li>No first aid or support for stress/ trauma required.</li> </ul>
2	Minor	<ul style="list-style-type: none"> <li>Environmental surroundings may contribute to child being at risk</li> <li>Minor behavioural issues</li> <li>Minor first aid and support for stress/trauma event required.</li> </ul>
3	Moderate	<ul style="list-style-type: none"> <li>Serious injuries and/or illness requiring medical attention</li> <li>Complex welfare and/or health issue</li> <li>Serious stress/trauma event requiring professional support.</li> </ul>
4	Major	<ul style="list-style-type: none"> <li>Injuries requiring hospitalisation</li> <li>Child missing from main group</li> <li>A child is at risk of significant harm and/or neglect</li> <li>Stress/trauma requiring ongoing clinical support.</li> </ul>
5	Catastrophic	<ul style="list-style-type: none"> <li>Critical incident</li> <li>Death or disability of child</li> <li>Stress/trauma event requiring extensive clinical support for multiple individuals</li> <li>High level of distress to other parties.</li> </ul>

Likelihood Table		
Category	Level	Probability
A	Almost Certain	Almost certain to occur in most circumstances
B	Likely	Likely to occur frequently
C	Possible	Possible and likely to occur at some time
D	Unlikely	Unlikely to occur but could happen
E	Rare	May occur but only in rare and exceptional circumstances



## Risk Matrix Tool

Once the appropriate category of consequences and the likelihood of risk is determined, you can use a risk matrix tool to determine a risk score.

Results		PROBABILITY				
		Rare	Unlikely	Possible	Likely	Almost Certain
SEVERITY	Catastrophic	Medium (8)	High (16)	Extreme (20)	Extreme (23)	Extreme (25)
	Major	Medium (7)	Medium (12)	High (17)	Extreme (21)	Extreme (24)
	Moderate	Low (4)	Medium (10)	High (15)	High (18)	Extreme (22)
	Minor	Low (2)	Low (5)	Medium (11)	High (13)	High (19)
	Insignificant	Low (1)	Low (3)	Low (6)	Medium (9)	High (14)

## Risk Tolerance Levels

The risk score determined using the Risk Matrix Tool can provide an indication of the priority level of the risk, indicating the urgency to take remedial action.

Risk Rating	Risk Treatment
<b>Extreme 20-25</b>	<ul style="list-style-type: none"> <li>Activities must be suspended immediately until risks can be eliminated, controlled or reduced to a lower level.</li> <li>Report risk to the General Manager and seek further advice.</li> </ul>
<b>High 13-19</b>	<ul style="list-style-type: none"> <li>Risks are considered significant.</li> <li>Ensure all controls identified are in place and review processes regularly.</li> <li>Contact the General Manager for advice.</li> </ul>
<b>Medium 7-12</b>	<ul style="list-style-type: none"> <li>Risks are considered acceptable.</li> <li>Ensure all controls identified are in place and schedule regular review.</li> </ul>
<b>Low 1-6</b>	<ul style="list-style-type: none"> <li>No significant risks exist.</li> <li>Ensure controls are in place and monitor progress.</li> </ul>

### 4.3. Stage 3 - Controlling the Risk

Risk control involves the development and implementation of measures designed to reduce the level of risk to one that is as low as reasonably achievable. To achieve this effectively, you need to identify and consider relevant prevention strategies, procedures and processes that can be implemented.

Staff are responsible to ensure that measures to reduce the risk of injury are utilised effectively and that risks of injury are reduced as far as is reasonably practicable on a day to day basis.

#### Child Safe Situational Prevention Approach

Situational prevention aims to reduce the likelihood of inappropriate behaviour being carried out by making systematic and permanent changes that:

1. Increase the effort for inappropriate behaviour to be carried out
2. Increase the risks of perpetrators being caught
3. Make it harder for perpetrators to excuse or dismiss inappropriate behaviour.

Please note that the table below is a guide only and does not contain an exhaustive list of strategies to be implemented.<sup>1</sup>

Child Safe Situational Prevention Strategies		
Increase the Effort	Increase the Risks	Remove Excuses
<p><b>Deflect Offenders</b></p> <ul style="list-style-type: none"> <li>• Display NDGC’s commitment to child safety on-site and online</li> <li>• Publish NDGC’s child safe policies available on public platforms <i>i.e. website.</i></li> </ul>	<p><b>Extend Guardianship</b></p> <ul style="list-style-type: none"> <li>• Encourage and support child participation in decision making</li> <li>• Empower children to speak up if they do not feel safe</li> <li>• Create a child-centred culture within NDGC.</li> </ul>	<p><b>Set Rules</b></p> <ul style="list-style-type: none"> <li>• Implement codes of conduct for staff and facility users</li> <li>• Role descriptions and expectations outlining the duties of staff</li> <li>• Implement child safe policies and guidelines.</li> </ul>
<p><b>Screen Applicants</b></p> <ul style="list-style-type: none"> <li>• Ensure requirements to work with children are in place</li> <li>• Thorough reference checks to confirm prior employment history</li> <li>• Thorough interview process.</li> </ul>	<p><b>Assist natural surveillance</b></p> <ul style="list-style-type: none"> <li>• Facilities have rooms with large, unobstructed windows for natural surveillance and line-of-sight supervision</li> <li>• Ensure that all stakeholders are aware that complaints and concerns will be taken seriously.</li> </ul>	<p><b>Poster instructions</b></p> <ul style="list-style-type: none"> <li>• Age-appropriate posters and information to inform children how to stay safe</li> <li>• Posters indicating NDGC’s commitment to child safety</li> <li>• Poster informing stakeholders how to make a complaint.</li> </ul>
<p><b>Physical environment</b></p> <ul style="list-style-type: none"> <li>• Ensure concealed areas are not accessible</li> <li>• Reduce opportunity for children to be in concealed areas</li> <li>• Install surveillance equipment in high-risk environments.</li> </ul>	<p><b>Reduce anonymity</b></p> <ul style="list-style-type: none"> <li>• Ensure all staff members are easily identifiable by stakeholders</li> <li>• Provide feedback mechanisms that are easily accessible.</li> </ul>	<p><b>Alert consciousness</b></p> <ul style="list-style-type: none"> <li>• Provide ongoing support and guidance about Child Safe Best Practice</li> <li>• Disciplinary policies outline consequences of breaching the <i>Coaches Code of Conduct.</i></li> </ul>

<sup>1</sup> The table of *Child Safe Situational Prevention Strategies* is based on a guide provided by the NSW Office of the Children’s Guardian.

## 4.4. Stage 4 - Documentation

### Risk Assessments

All risk assessments performed for child safety risks must be recorded using the *Child Abuse Risk Assessment Tool* at **Section 5.2** of this *Policy*.

## 4.5. Stage 5 - Monitor and Review

The risk management process should be subject to continuous monitoring and review to ensure that the stages remain relevant to the risks which are prevalent in the specific environment.

## 5.0 Risk Assessment for Child Safety Complaints

When an individual is alleged to have been accused of, investigated for, or charged with child abuse or misconduct with a child or young person, the level of risk posed to children in relation to the complaint must be assessed. To determine the level of risk associated with a child safety complaint, refer to the following:

1. Spectrum of Behaviours Table
2. Child Abuse Risk Assessment Tool
3. Critical or Non-Critical Allegations Assessment.

## 5.1. Spectrum of Behaviours<sup>2</sup>

Spectrum of Behaviours	
<b>Child Safe behaviours</b>	<ul style="list-style-type: none"> <li>• Respect child rights and promote child safe practices.</li> <li>• Uphold the United Nations Convention on the Rights of the Child and the values of Gymnastics Australia (GA).</li> <li>• Contribute to a culture of safety towards all people, especially children, <i>e.g. appropriately following the GA Child Safe Policy, guidelines and Codes of Behaviour.</i></li> </ul>
<b>Inappropriate behaviours</b>	<ul style="list-style-type: none"> <li>• May “blur boundaries’ with children and disregard a young person’s rights to personal safety</li> <li>• Behaviours may be the result of poor judgement in a specific scenario.</li> <li>• Inappropriate behaviours fall short of specifically defined Unacceptable Behaviour.</li> <li>• If they are allowed to continue and are repetitive, they may escalate into unacceptable behaviour or abuse and potentially criminal behaviour, <i>e.g. yelling at and berating a child for underperforming.</i></li> </ul>
<b>Unacceptable behaviours</b>	<ul style="list-style-type: none"> <li>• Breach GA’s values and policies</li> <li>• May be considered “grey area”</li> <li>• Fall short of criminal behaviour or the legal definitions of abuse.</li> <li>• If these behaviours are allowed to continue, they may escalate into abuse or criminal behaviour, <i>e.g. forming a close bond with a particular athlete and showing favouritism.</i></li> </ul>
<b>Abusive/illegal behaviours</b>	<ul style="list-style-type: none"> <li>• Include the four types of child abuse, namely child sexual abuse, physical abuse, emotional abuse and neglect. These behaviours can have significant and long term adverse impacts for Children.</li> <li>• Breach GA values and policies and could result in criminal prosecution, <i>e.g. breaching GA Child Safe Policy, Guidelines, Codes of Conduct and Child Protection Laws.</i></li> </ul>

<sup>2</sup> Adopted from the GA Child Safe Policy - Attachment H.

## 5.2. Child Abuse Risk Assessment Tool<sup>3</sup>

When assessing the risk an individual poses to children and young people in relation to a complaint, you should consider the factors in the table below. Each allegation should be assessed on a case by case basis.

Risk Assessment: Allegations of Child Abuse	
The nature of the alleged or proven offence:	<i>Refer to Section 11 of NDGC's Child Safe Policy for information on the different forms of child abuse.</i>
The circumstances in which the alleged or proven offence occurred:	
The place or places where the alleged or proven offence occurred:	
The age and gender of the alleged offender:	
Were there additional vulnerabilities of the person that is the subject of the complaint?	
The age and gender of the alleged or proven person that is the subject of a complaint(s):	

<sup>3</sup> Adopted from the GA Child Safe Policy - Attachment I.

<p>Did the alleged offender have regular and frequent contact with other children or groups of children? What was the nature and circumstances of that contact?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Nature of Contact: <i>e.g. Gymnastics Coach in weekly contact with children aged between 8 and 12 years old.</i></p>
<p>The opportunities that were available to the alleged offender to offend against other children:</p>	<p><i>e.g. during gymnastics classes (potential to arrange for unsupervised contact outside of gymnastics) etc.</i></p>
<p>What safety measures were already in place when the alleged offence occurred?</p>	<p><i>e.g. the coach would spend one on one time with the affected child during training even though this behaviour is prohibited in the Code of Conduct.</i></p>
<p>Are there any high risk scenarios the alleged offender has access to?</p>	<p><i>e.g. the alleged offender is the driver for an upcoming interstate club event. Any time an adult spends time overnight with a child there is a higher risk to the child.</i></p>
<p>Does the offender have access to direct, unsupervised contact with children?</p>	

### 5.3. Critical or Non-Critical Allegations

Once the level of risk has been determined, the tables below will provide guidance as to whether an allegation is Critical or Non-Critical. The level of risk and the type of allegation will determine what safety measures are required to safeguard children as a result of the complaint/allegation.

Level of Risk	Critical or Non-Critical
High Risk	Critical
Medium Risk	Non-Critical
Low Risk	Non-Critical

#### Critical Allegations may include but are not limited to:

- A breach or allegation that has resulted in, or is likely to result in, significant harm to a child
- **Any** allegation involving sexual abuse or criminal behaviour
- Abusive or illegal behaviours
- Any allegation that is being investigated by police or child protection authorities.

#### Non-Critical Allegations may include but are not limited to:

- A breach or allegation that has **NOT** resulted in, or is not likely to result in, significant harm to a Child
- Inappropriate behaviour(s) that do not involve sexual abuse or criminal behaviour(s)
- Unacceptable behaviour(s) that are not abusive or illegal
- Any allegation which the Police or Child Protection Authorities have advised there is insufficient evidence to pursue further investigation and/or charges.

### 5.4. Implement Safety Measures

After the level of risk and type of allegation is determined, consider what actions are necessary to safeguard children and young people. Some examples include, but are not limited to, the following:

- Removal of the staff member from child-related work
- Suspension of a gymnast's membership
- Additional supervision of the staff member
- Provision of ongoing monitoring and support of the affected child
- Delivery of targeted training to staff.