



Risk Management Policy

Reviewed: August 2021
Ratified: September 2021
Next Review: 2022

Rationale

This policy is designed to support the Diocese of Ballarat Catholic Education Limited (DOBCEL) Board, Management and Schools in adopting a single and consistent approach to risk management in alignment with diocesan expectations and Victorian legislative requirements. This includes the specific requirements of the Victorian Child Safe Standards as set out in Ministerial Order 870 which imposes particular obligations on the DOBCEL Board as the governing authority of fifty-six schools and those of the *Australian Standard and Risk Management (AS ISO 31000:2018) Guidelines*.

The policy intention is to embed risk management into all decision-making processes and to provide a consistent approach to managing and reporting on existing and emerging risks across DOBCEL Schools and DOBCEL Management for oversight by the ultimate governing body, the DOBCEL Board.

Policy Statement

The DOBCEL Board has a strong commitment to creating and maintaining the highest standards in resourcing and policy stewardship as part of its commitment to good risk management. This means providing a safe educational environment for all community members and upholding exemplary educational standards, both of which actions are vital for the effective functioning of all DOBCEL Schools.

Underpinning this commitment DOBCEL Management and Schools must, where applicable, adopt, adhere to and implement all DOBCEL policies. This will support and assist in minimising the risks associated with operating in the education sector.

DOBCEL Principles of Governance

Transparency and accountability in stewardship of resources

Transparency demands timely and accurate disclosure/reporting concerning the performance, decision making and financial health of DOBCEL to all stakeholders.

Accountability refers to the obligation of DOBCEL to accept responsibility for its activities and to disclose the results. It also includes responsibility for money, resources or other entrusted property.

These two principles converge in the social responsibility to care for persons, resources and our planet as precious and vital to life. **Responsible stewardship** is integral to the mission of the Church and is a fundamental tenet of the Church's spirituality.

It entails a responsibility for service that aims to nurture a gift from another. Frequently understood in relation to care for our common home, the ideas fundamental to stewardship apply more broadly, involving the just and proper use of human and material resources through prudent management, wise investment and usage.¹

Common good

People are fundamentally social beings. Social, political and economic organisation has, therefore, implications for the entire community. Each social group, therefore, must take account of the rights and aspirations of other groups, and of the well-being of the whole human family. The common good is reached when all work together to improve the wellbeing of society and the wider world. The rights of the individual to personal possessions and community resources must be balanced with the needs of the disadvantaged and dispossessed.²

Co-responsibility

Participation in community brings with it both a range of rights and protections and a range of duties and obligations. The particular responsibility each person has within the Church stems from the responsibility that all Christians have by virtue of their Baptism. All share in responsibility for the being and activity of the Church and all the People of God make a specific contribution to the Mission.

Policy Objectives

The objectives of this policy are to:

- ensure that the DOBCEL Board has a line of sight to all risks
- provide guidance to DOBCEL bodies in all aspects of risk management
- assist in understanding the important role of risk management and its relationship to safety and to educational outcomes
- provide a framework to integrate risk management into daily operations
- raise awareness of risk appetite in strategic and operational decision-making
- provide safe and secure learning environments for all members of DOBCEL education communities
- promote a positive organisational culture, in which people not only feel safe but also understand their responsibilities in a risk-aware culture
- identify and manage opportunities for the improvement of educational outcomes
- ensure that compliance, statutory, organisational and governance requirements are met
- provide policies, processes and practices to improve accountability, responsibility, transparency and governance in risk management and to ensure that people, property, data and resources are secure.
- ensure alignment to DOBCEL Vision and Strategic Intent

¹ See *The Light from the Southern Cross*, *op.cit.*, 3.2.4 p.28.

² <https://www.caritas.org.au/learn/cst/the-common-good>. See also *The Light from the Southern Cross*, *op.cit.*, p.162.

Policy Description

ISO3100:2018 Risk Management – Guidelines defines risk management as “*coordinated activities to direct and control an organisation with regard to risk*”. The DOBCEL Board has based its approach to risk management on the key elements of these Guidelines.

Effective risk management recognises that in any situation there is always an element of risk and with that a responsibility to have policy, processes and practices to address potential risks.

The DOBCEL Board operating as a governing body within the education sector must be aware of risks in the following areas:

- welfare and safety of the education community
- school/workplace culture
- learning outcomes of students
- reputation or viability of a school and its Catholic identity
- exposure to potential serious legal issues
- achievement of diocesan, government and community expectations in the operation of DOBCEL Schools, with reference to DOBCEL as an educational provider and the schools as places of employment.

In accordance with Ministerial Order 870 and to manage exposure to serious legal issues, the DOBCEL Board requires that child safety policies and practices are informed by risk management principles.

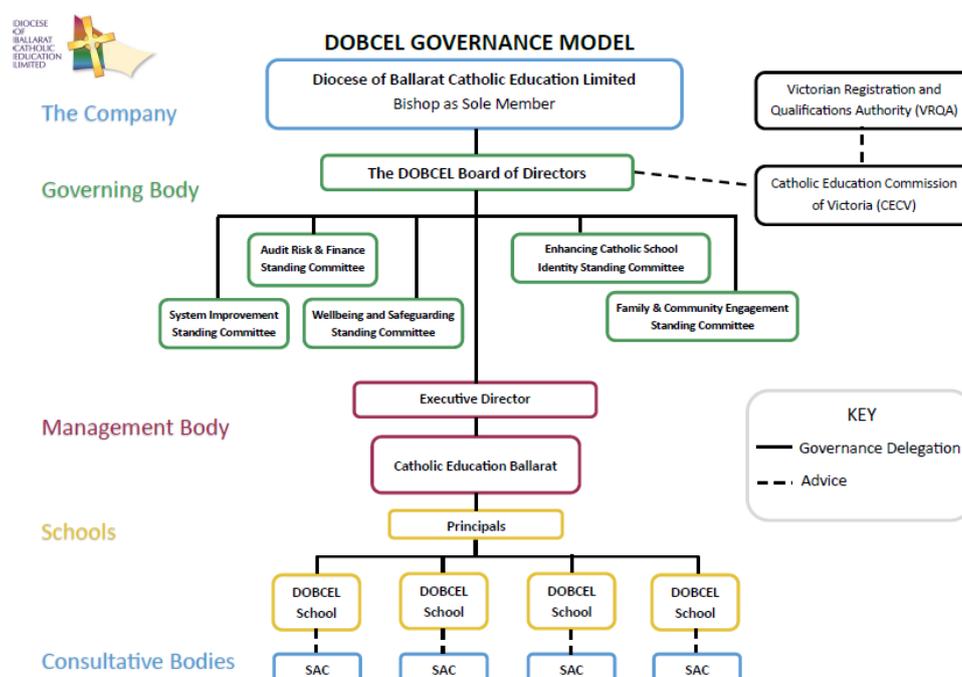
DOBCEL Board recognises that risks are present, or will emerge, in all aspects and stages of DOBCEL’s operations. Therefore, a sound framework for managing risk is essential. While risks can present threats, they also provide opportunities for improvement. Thus, it is important that each risk is recognised and appropriately managed.

Risk Management refers to the coordinated approach for identifying, evaluating, treating, reviewing and monitoring of risks that could prevent DOBCEL from achieving its strategic goals and objectives. An effective risk management framework provides the DOBCEL Board with increased confidence that it is fulfilling its obligations in this particular area.

To manage risk effectively, the DOBCEL Board has implemented a risk management framework and infrastructure that defines strategies and actions for eliminating or minimising the impact of risk. This includes establishing a culture of risk awareness in all areas of DOBCEL so there is a logical and systematic approach to the identification and management of risk in a way that minimises loss and maximises gain. Such an approach provides assurance to the DOBCEL Board that it is on track to achieving its organisational and strategic goals.

Roles and Responsibilities

The DOBCEL Board has responsibility for overseeing and monitoring the assessment and management of risk and compliance. It receives information and reports from the Audit, Risk and Finance Standing Committee. The diagram below depicts the different levels beginning with the company and extending to the DOBCEL schools:



The table below describes the roles and responsibilities of each level in relation to this policy. The specific activities of each role in supporting the implementation of the policy are further defined in the *Risk Management Framework and Procedures* document.

Level	Roles and Responsibilities
DOBCEL Board	The Board has the ultimate responsibility for risk management. The respective Standing Committees review the implementation of policies and make recommendations to the Board. Delegations from the Board to the Executive Director and Principals are defined in the DOBCEL Instrument of Delegations.
DOBCEL Standing Committees	DOBCEL Standing Committees review policies and procedures, monitor areas of risk associated with their specific Terms of Reference and escalate high risk issues to the ARFSC and Board. The Standing Committees advise the Board and Executive Director on areas of risk that require support, intervention or oversight.

Level	Roles and Responsibilities
Executive Director	<p>Reports to and is accountable to the DOBCEL Board in the area of risk. As well, the Executive Director oversees the work, wellbeing and safety of school principals and all employees of DOBCEL and ensures school environments meet DOBCEL Board and government compliance and statutory requirements and community expectations. The Executive Director also ensures that:</p> <ul style="list-style-type: none"> • risk management procedures are implemented and communicated to staff • operational risks associated with DOBCEL, DOBCEL Schools and with designated projects and programs are monitored appropriately • risk management is supported by professional learning for all DOBCEL employees and works in partnership with principals and DOBCEL Management in monitoring and improving risk management.
DOBCEL employees (including school staff and communities)	<p>All DOBCEL employees are responsible for maintaining awareness of and complying with DOBCEL policies and procedures and the school's procedures and practices, instilling risk-awareness in students and bringing risk-related matters to the attention of the Risk Management Leader, Responsible Officer or Compliance Officer.</p>
DOBCEL Management	<p>Are responsible for overseeing operational risks for DOBCEL and at the school level and ensuring any compliance breaches are escalated to the Executive Director. DOBCEL Management have an important role in leading the example to integrate risk management to schools practices.</p>
DOBCEL School Principals	<p>Principals are responsible for risk management in their schools and in this, as in other areas, are responsible to the Executive Director. Through a contractual agreement with DOBCEL as the employer, the Principal is responsible for:</p> <ul style="list-style-type: none"> • overseeing the educational program • ensuring the wellbeing and safety of all within the school environment • ensuring that diocesan and government compliance and statutory requirements and community expectations are met • ensuring that the risk management strategy is implemented and is communicated to staff, students, parents and the wider school community • ensuring that risk management is supported by professional learning for staff • working in partnership with DOBCEL Management in monitoring and improving risk management strategies • identifying, evaluating and managing operational risks and ensuring appropriate controls and/or treatment plans are implemented and reviewed • actively monitoring risk treatment plans and controls with nominated risk leaders in the school • escalating key operational risks to the relevant member of DOBCEL Management for review and to inform DOBCEL service provision.

Risk Management Obligations

DOBCEL's approach to risk management is guided by the International Standard *ISO31000:2018 – Risk Management Guidelines* and the *DOBCEL Risk Management Framework* and seeks to comply with the state and federal legislation including, but not limited to:

Australian Charities and Not-for-profits Commission (ACNC)

Australian Education Act 2013 (Cth) [The principal legislation for the provision of Australian Government funding to government and non-government schools]

Australian Education Regulation 2013 (Cth) [Provides more detail to support the operation of the Act. It outlines the financial accountability and other conditions that are required in order to receive funding under the Act]

Australian Standard and Risk Management Guidelines (AS ISO 31000:2018) 2018. [Provides a common approach to managing any type of risk and is not industry or sector specific]

Children, Youth and Families Act 2005 (Vic) [Child protection law strengthens the Victorian Government's response to children and young people in out-of-home care, their parents and carers, and the services that support them]

Corporations Act 2001 (Cth)

Crimes Act 1958 (Vic) [The Crimes Act 1958 is an Act of the Parliament of Victoria. The Act codified most common law crimes in the jurisdiction]

Education and Training Reform Act 2006 (Vic) [To reform the law relating to education and training to provide a high standard of education and training for Victorians]

Education and Training Reform Regulations 2017 (Vic)

Education and Training Reform Amendment Act 2010

Equal Opportunity Act 2010 (Vic)

Fair Work Act 2018 (Cwlth)

Guidelines to the Minimum Standards and Other Requirements for Registration of Schools

Ministerial Order 706 (Vic) – Anaphylaxis Management in Schools

Ministerial Order 870 (Vic) - Child Safe Standards. [Managing the risk of child abuse in schools in order to be registered, and remain registered with the Victorian Registration and Qualifications Authority (VRQA)]

Occupational Health and Safety Act 2004 [The main workplace health and safety law in Victoria]

Privacy Amendment Act 1988 (Cth) [Is an Australian Law introduced to promote and protect the privacy of individuals]

Victorian Equal Opportunity Act 2010 (Vic) [Covers discrimination in employment, sexual harassment and victimisation at work]

Working with Children Act 2005 (Vic) [Under the current Act a person engaged in 'child-related work' must obtain a WWCC]

Risk Management Framework

The DOBCEL Board has developed a risk management framework that outlines the approach to risk across all areas of the company. The implementation of this framework ensures that all DOBCEL bodies 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 in developing and updating resources, guides, tools and training.

Policy Review

The Audit, Risk and Finance Standing Committee (ARFSC) will review the effectiveness of this policy every two years, or earlier if deemed necessary. The ARFSC will report to the DOBCEL Board with recommendations for any amendments to the policy. These will be assessed by the Board and implemented as determined.

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-connected work means work authorized by the school governing authority and performed by an adult in a school environment while children are present or reasonably expected to be present.

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 possibility that an event will occur and adversely affect the achievement of objectives, whilst noting that an event may also create opportunities.

Risk management - a coordinated approach to identifying risks that may occur in the organization and stewardship of education. Risk management recognizes that there is always an element of risk in the operations 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 elements and procedures, resources and communication in managing risk within the education organisation.

Related Policies and Procedures

- DOBCEL Risk Management Framework and Procedures
- DOBCEL Behaviour Management Policy
- DOBCEL Child Safe Governance Policy
- DOBCEL Grievance Policy
- DOBCEL Occupational Health and Safety Policy
- DOBCEL School Improvement Policy
- DOBCEL School Financial Oversight Policy
- DOBCEL Credit Card Policy
- DOBCEL Fraud Prevention and Reporting Policy
- DOBCEL External Financial Audit Policy