



# ST MARGARET'S RISK MANAGEMENT STRATEGY AND OPERATIONAL FRAMEWORK

## Introduction

St Margaret's Anglican Girls School recognises the management of the school's risks are an important and serious responsibility. The school, and its stakeholders, may face a myriad of risks that threaten the achievement of academic, safety, financial, reputation, regulatory and strategic objectives. The need to manage risk is driven by numerous factors including changes in society, growing expectations from parents and regulators, increased litigation, competition and global events.

The School Council recognises that, together with the Principal and staff, they are responsible for instilling a strong risk-aware and control-conscious culture throughout the school. As a result, the likelihood and impact of risks are reduced and actual or potential problems that may emerge can be best identified, managed and resolved in the normal course of the school's operations and in the best interests of the school's stakeholders.

Risks that are inherent to the operation of the school will be identified, analysed, evaluated and undertaken in a consistent manner. Risk management procedures that form the Risk Management Framework will be used to ensure that risks are monitored and managed to an acceptable level of tolerance to the school, as defined by the Board.

## Objectives

The School's objectives in developing a risk management strategy are to:

- Protect valuable assets, inclusive of people, processes, property, products and reputation;
- Improve planning processes by enabling the key focus to remain on core business and to help ensure continuity of service delivery ;
- Reduce the likelihood of potentially damaging occurrences and assist with preparing the school to effectively manage challenging events;
- Contribute to the development of a positive organisational culture, in which people not only feel safe but also understand their purpose, roles and direction in a risk-aware culture;
- Improve accountability, responsibility, transparency and governance in relation to both decision-making and outcomes;
- Fulfil our fiduciary obligations;
- Ensure to the best of our ability that the School environment is a safe place for all students.

## Definitions

<b>Consequence</b>	The expected outcome or impact of a risk event
<b>Current risk</b>	The risk that remains after mitigating actions or controls have been considered. Current risk is assigned a rating based on current consequences and current likelihood (commonly considered the residual risk rating)

<b>Inherent Risk</b>	Rating of a risk assuming no controls are in place
<b>Likelihood</b>	The probability or chance of a risk event occurring
<b>Operational Risk</b>	Key risks arising from St Margaret's operational activities. Operational risks are component risks within each strategic risk
<b>Residual risk</b>	The level of risk that remains after assessing the effectiveness of the controls, management strategies and other mechanisms in place to mitigate a particular risk (Treated Risk)
<b>Risk</b>	Risk is often characterised by reference to any event that will have an impact on the school or any of its activities. Risk is measured in terms of the consequences that could arise from an event (including changes in circumstances), and the likelihood of that particular consequence occurring.  Risks to St Margaret's are generally assessed in terms of their people, reputation, business operations, governance, financial and educational/ academic outcomes respectively
<b>Risk appetite</b>	The risk appetite of St Margaret's is the amount and type of risk that St Margaret's is willing to take in order to meet its strategic objectives.
<b>Risk identification</b>	The process of determining that what, where, when, why and how something could happen
<b>Risk Management Framework</b>	Framework enabling the consistent management and reporting of risk throughout St Margaret's. The framework includes a risk policy, risk assessment protocol, risk reporting protocol and risk register
<b>Risk rating</b>	Register that defines and assesses key components of each risk
<b>Risk register</b>	Register that defines and assesses key components of each risk
<b>Risk treatment</b>	The process of implementing measures to modify risk
<b>Strategic Risk</b>	Risk categories that represent the key risk areas for St Margaret's. Strategic risks impact on the achievement of the organisation's strategic objectives
<b>Worst credible consequence</b>	The worst potential consequence arising from a risk event should that risk occur. Worst credible consequence should be used to calculate consequence ratings

## Responsibilities

Refer to Appendix One for the Reporting Structure and Frequency.

Responsibility for risk management at St Margaret's Anglican Girls School resides with the following:

### 1. School Council

The School Council is responsible for approving the risk management strategy and for instilling a mature risk-aware culture within the school. While the School Council has ultimate responsibility for risk management, it delegates the day-to-day responsibility to the Principal and staff.

### 2. Finance Risk Management Committee

The Finance Risk Management Committee (FAARM), which is a sub-committee of the School Council, is responsible for the oversight and monitoring of compliance with the risk management strategy.

### 3. **Principal and Staff**

The Principal and staff are responsible for complying with and enforcing the risk management strategy as well as communicating the strategy to teachers, students, parents and the wider St Margaret's community. The Principal and staff are also responsible for ensuring that risk management is supported by a program of education, training and development for staff at all key levels in the organisation.

### 4. **Internal Risk Committee**

The Internal Risk Committee is responsible for developing and coordinating the execution of the risk management strategy and the on-going identification, assessment and mitigation of risk (see Appendix Two).

### 5. **Risk Advisor**

An external risk advisor is responsible for testing compliance with the risk management strategy and for providing advice on risk-related matters.

### 6. **Parents and members of school community**

Parents and members of the school community are responsible for maintaining awareness of, and complying with, the school's policies, instilling risk-awareness in their children and bringing risk-related matters to the school's attention.

### 7. **Students**

Students are responsible for complying with the school's policies; following the instructions of staff and adopting appropriate behaviour.

### 8. **Senior Leadership Team**

The Senior Leadership Team has responsibility for communicating and consulting with staff to ensure risks are identified, appropriate controls are in place and any necessary treatments are addressed in relation to the operational activities of the school.

The Senior Leadership Team comprises those persons incumbent in the positions of:

1. Principal
2. Deputy Principal
3. Director - Business & Operations SSA
4. Dean of Academics
5. Dean of Studies
6. Dean of Students
7. Head of Boarding
8. Head of Primary
9. Assistant Head of Primary – Curriculum
10. Assistant Head of Primary – Wellbeing & Operations (PP-6)
11. Director of Human Resources
12. Chief Information Officer - SSA
13. Director of Marketing & Communications
14. School Chaplain

## 9. All Staff, Contractors and Volunteers

Risk management is the responsibility of all St Margaret's staff, contractors and volunteers. This group should be aware of and are responsible for applying risk management principles and practices relevant to all areas of their work.

### Risk Management Framework

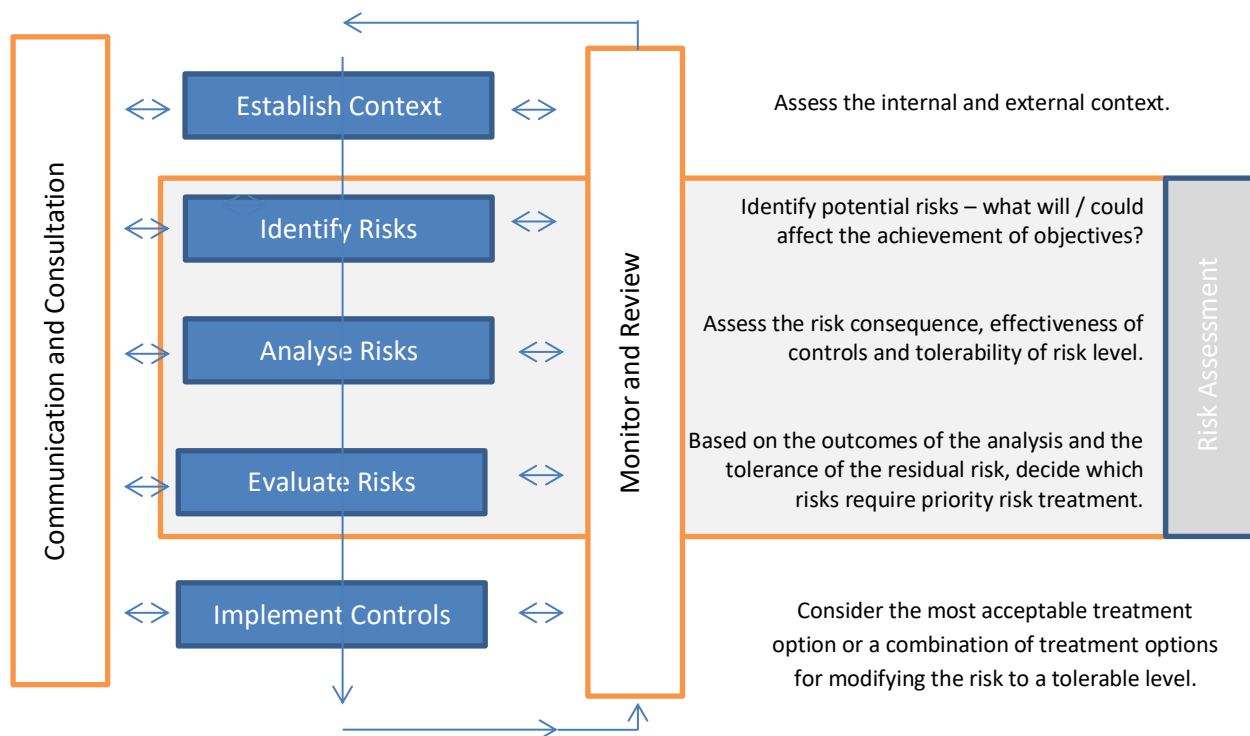
In instances where the perceived risk is that of harm or abuse to a student, then refer to:

- St Margaret's Child and Youth Risk Management Strategy
- Student Protection in Anglican Schools Policy
- Student Protection in Anglican Schools Procedure
- Working with Children in Anglican Education Policy
- Working with Children in Anglican Education Guidelines and Procedures

St Margaret's Risk Management Framework provides a systematic approach to identifying, assessing and treating risks. The school adopts a 7 step approach as outlined below:

The factors that are critical to the success of our risk management strategy include:

- embedding a risk-aware culture throughout the school;
- communicating our risk management strategy to all stakeholders;
- acknowledging that 'it can happen here';
- adopting innovative techniques to mitigate risks;
- effective identification and management of school-related strategic risks in addition to the operational risks;
- engaging staff and students in discussions on risk and control concepts; and
- adopting a continuous improvement philosophy.



## I. Communication and Consultation

It is essential throughout the risk management process that those involved in managing risk are aware of and understand why particular actions are necessary. Risks may be communicated by written or verbal means. Records of any decisions that arise from communication and consultation activities are kept for future reference and accountability purposes.

Communication and consultation related to risk matters occurs at St Margaret's at a number of levels and through a variety of mechanisms. Some of these mechanisms include:

### *Staff Professional Learning*

- Staff Professional Learning – for example Fire and Evacuation Training conducted annually as per legislative requirements;
- Staff seminars such as Workplace Harassment and Bullying, Duty of Care and Staff Social Media use;
- Training videos available for Maintenance staff, for example lifting techniques;
- First Aid Training and Epi-Pen training available for all staff on an annual basis;
- All Boarding Staff must complete the Australian Boarding Schools Association (ABSA) Certificate Course in Residential Care;
- All Rowing Coaches must complete the *Brisbane River Code of Conduct* Seminar at commencement of the Rowing season.

### *Staff and Student Consultation*

- All staff are invited to contribute agenda items for monthly Internal Risk Meetings;
- *Workplace, Health and Safety* issues are a standard agenda item at the following meetings: Education Leadership Team, Senior Leadership Team, Head of Faculty, Head of Year, Primary Staff meetings, Whole School Staff meetings, Boarding House Staff meetings;
- Upon commencing employment all new staff must attend an Induction Session where selected Workplace Health and Safety policies are addressed;
- Consultation with students is conducted through the Student Representative Council (SRC).
- Educational programs in Primary and Secondary Schools incorporate Stranger Danger, Personal Safety, Party Safe, Risk Behaviours/Avoidance and Cyber-Safety units of work.

### *Parent and School Community Consultation*

- Communication with the wider school community can occur through a range of mediums, for example imminent risks can be directly communicated via SMS alerts and emails;
- Parent Information Evenings conducted throughout the year also provide our school community with information related to child and adolescent cyber-safety, teenage risk behaviours and bullying.

### *School Procedures*

- Evacuation and Lock Down drills are conducted for the Boarding House and as a whole of school annually with clear communication and consultation with students and staff throughout this procedure;
- All staff 'sign off' after reading of all relevant school policies;
- All Position Descriptions and Contracts capture the relevant risk responsibility for each staff member.

## 2. Context

The context refers to the environment in which the school objectives are to be achieved and the relationship between the school and the external environment.

The external environment refers to:

- the socio-cultural, political, legal, regulatory, financial, technological, economic, natural and competitive environment, whether international, national, regional or local;
- key drivers having an impact on the school;
- relationships with key external stakeholders.

The internal environment refers to:

- governance, organisational structure, roles and responsibilities;
- policies, procedures and strategies;
- resources, training and knowledge;
- relationships with key internal stakeholders.

## 3. Identify Risks

Identifying risk involves considering what, why, when, where and how things happen. A range of procedures at St Margaret's are used to identify risks, these include for example:

- Discussion and identification of non-physical risks by School Council and Council sub-committees;
- *Risk Assessment Forms* submitted for all School Excursions, Camps, Sporting Trips and International Tours;
- Risk scenario workshops completed by the Senior Leadership Team;
- Safety Reports completed by external auditors (DRA);
- Implementation of Enterprise Risk Management software;
- Review of *Accident and Incident Reports* at Internal Risk and FAARM Meetings;
- Annual Review of School policy and procedures;
- Communication with people who have appropriate knowledge and levels of experience to gain a view of possible risk, for example Outdoor Education providers, Science Lab Technicians (Biochemist), Risk Management consultants;
- Risk Assessments completed for all major school events;
- Referral of all WH &S concerns, as raised by staff or parents, to Internal Risk Meetings;
- Identification of risks through discussion at monthly Internal Risk Meetings and Senior Leadership meetings;
- Identification of risks as documented in the following:
  - ✓ *Risk Assessment Processes for Practical Units of Work*  
Health and Physical Education Faculty
  - ✓ *Risk Assessment Guidelines and Procedures for Teachers and Laboratory Staff*  
Science Faculty
  - ✓ *Risk Assessment Processes for St Margaret's Sport*  
Sport Department
  - ✓ *Risk Framework – Boarding House*

- ✓ Risk Assessment Guidelines – Rowing
- ✓ Workshop Maintenance Procedures

#### 4. Analyse Risk

All staff are involved with analysing risk to ensure an understanding of each risk, its consequences and the likelihood of the risk occurring is completed. This is particularly important for staff submitting an *Activity Risk Assessment* for student-based activities. The completed risk analysis informs the evaluation of risks, whether risks need to be treated and the selection of the most appropriate risk treatments.

**All Risk Analysis is completed in conjunction with Common-law Duty of Care:**

Staff responsible for student activities must take reasonable care to avoid foreseeable risks. For example, in the case of potential injury, by:

- making sure that activities are safe and appropriate for the students' age;
- ensuring students are properly instructed and prepared for the activities;
- ensuring all equipment is in a safe condition to use;
- providing adequate supervision.

**Risk** is the likelihood that a harmful consequence (e.g. injury) will occur when exposed to a hazard. As such, the risk level is made up of two elements:

- (a) Likelihood of an incident happening, and
- (b) Consequence if it did happen.

$$\text{Risk} = \text{Likelihood} \times \text{Consequence}$$

There are many factors that influence the likelihood and consequence of an incident. Examples include:

- duration or frequency of the exposure to the hazard (e.g. sun or chemical exposure);
- competence and qualifications of those leading the activity (no training or inexperience may lead to an accident);
- staff to student ratios or Blue Card qualifications;
- environmental conditions (e.g. water in the vicinity of electricity, getting injured in an isolated area);
- speeds, heights and weights of objects being used (the greater the force, the greater the impact);
- modes of transport.

To assess the level of risk, the likelihood of an incident occurring in combination with the seriousness of the consequence is analysed. The matrix below is used as a guide to assist with the risk assessment.

	<b>Consequence</b>
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Likelihood	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Critical
5 Almost Certain	Medium	Medium	High	Extreme	Extreme
4 Likely	Low	Medium	High	High	Extreme
3 Possible	Low	Medium	High	High	Extreme
2 Unlikely	Low	Low	Medium	Medium	Extreme
1 Rare	Low	Low	Low	Low	Extreme

Consequence Rating	Description of Consequence
1. Insignificant	No treatment required
2. Minor	Minor injury requiring First Aid treatment (e.g. minor cuts, bruises, bumps)
3. Moderate	Injury requiring medical treatment or lost time of four or fewer days
4. Major	Serious injury (injuries) requiring specialist medical treatment or hospitalisation, or greater than four days lost time
5. Critical	Loss of life, permanent disability or multiple serious injuries

## 5. Evaluate Risks

The assessed inherent risk level will determine the degree of planning and approval required.

Inherent Risk Level	Action Required/ Approval	
Low	Little chance of incident or injury.	<ul style="list-style-type: none"> <li>Manage through regular planning processes.</li> </ul>
Medium	Some chance of an incident and injury requiring first aid.	<ul style="list-style-type: none"> <li>Document controls in planning documents.</li> <li>Recommendation to obtain parental/carer permission.</li> <li>An Activity Risk Assessment is required to be completed.</li> </ul>
High	Likely chance of a serious incident and injury requiring medical treatment.	<ul style="list-style-type: none"> <li>An Activity Risk Assessment is required to be completed.</li> <li>Principal approval required prior to conducting this activity.</li> <li>Once approved, activity details are to be entered into the School Activity Register.</li> <li>Obtain parental permission.</li> </ul>
Extreme	High chance of a serious incident resulting in highly debilitating injury.	<ul style="list-style-type: none"> <li>Consider alternatives to the activity.</li> <li>An Activity Risk Assessment is required to be completed.</li> <li>Principal approval prior to conducting this activity is required.</li> <li>Once approved, activity details are to be entered into the School Activity Register.</li> <li>Parental/carer permission must be obtained for student participation.</li> </ul>



**Control Measures** are the methods used to lower the level of risk to an acceptable level. The types of control measures listed in the 'hierarchy of control' are considered and used in the preferred order below:

**Elimination:** remove the hazard completely from the workplace or activity.

**Substitution:** replace a hazard with a less dangerous one (e.g. using a softer ball, different location).

**Isolation:** separate people from the hazard (e.g. safety barrier).

**Redesign:** making a machine or work process safer.

**Administration:** putting rules or training in place to make a workplace safer.

**Personal Protective Equipment:** protective clothing and equipment (e.g. safety glasses, helmet, gloves, shin-pads, mouth guards).

An evaluation of each risk once undertaken determines those risks that are acceptable and those that require further treatment. To treat unacceptable risks, the school may improve existing controls or develop and implement new controls. Controls are mechanisms that modify risk and are designed to address the root cause of risk. They are (typically) policies, processes, procedures, and strategies. Controls are used to calculate the current (controlled) risk level and identify the extent to which controls are modifying the risk.

Risks with a 'treated risk' rating of low or medium are deemed to be acceptable and should be managed locally. Those risks with a 'treated risk' rating of high or extreme require specific treatment actions and the attention of the Senior Leadership Team.

## **6. Implement Control Measures**

Risk treatment is the process by which existing controls are improved or new measures are developed and implemented to reduce the level of risk. Staff must follow the actions outlined in the *Activity Risk Assessment* evaluation to effectively manage and treat risks. A process of 'spot checks' will occur through a rotating roster and documented checklist to ensure control measures have been correctly implemented.

## **7. Monitor and Review**

Potential risks and management of risks are continually monitored and reviewed to ensure a proactive approach to managing risks occurs as new risks emerge and existing risks change. This includes reviewing the effectiveness of risk controls and treatments. Continuous monitoring and review of risks are also conducted by the Internal Risk Committee to ensure new risks, and any changes to existing risks, are identified and managed to provide an up-to-date view of the risk status.

## **Limitations**

The Risk Management Strategy and Operational Framework at St Margaret's Anglican Girls School seeks to reduce, but is not necessarily able to eliminate the school's risks.

Unfortunately, no risk management strategy can provide complete certainty that one or more risk events will not arise. Despite such limitations, investing in a formal risk management strategy is prudent and helps the school to fulfil its fiduciary duties. The school's operating framework, combined with a philosophy of continuous improvement, provides a sound mechanism to reduce the likelihood and impact of certain risk events, and in the process support the achievement of the school's strategic objectives.

**Review Date: March 2024**

## Appendix One Reporting Structure and Frequency

Level	Reporting Structure	Risk Management Activities & Reporting	Frequency
1	Student , Parents & Visitors	<ul style="list-style-type: none"> <li>• Safety training &amp; induction activities</li> <li>• Reporting of incidents to teachers and support staff</li> </ul>	Prior to activities or events
2	Teachers & Staff	<ul style="list-style-type: none"> <li>• Education, training &amp; induction activities</li> <li>• Written compliance with School Policies</li> <li>• Complete Risk Assessments</li> <li>• Conduct drills and safety compliance activities</li> <li>• Referral of incidents to Internal Risk Committee</li> </ul>	Daily Prior to activities or events
3	Senior Leadership Team	<ul style="list-style-type: none"> <li>• Oversight of Internal Risk Committee</li> <li>• Review of Policies</li> </ul>	Daily Weekly meeting Risk Scenario Workshops
4	Internal Risk Committee	<ul style="list-style-type: none"> <li>• Review of incidents and recommendations for action</li> <li>• Evaluation of operation risks and actions</li> <li>• Debate on strategic risks</li> </ul>	Daily Monthly meeting
5	School Council Finance and Risk Management Committee (FAARM)	<ul style="list-style-type: none"> <li>• Review of incidents and recommendations</li> <li>• Review of risk register</li> <li>• Review of reporting structure</li> <li>• Review of strategic risks</li> <li>• Compliance reporting and advice to School Council</li> </ul>	Quarterly
6	School Council	<ul style="list-style-type: none"> <li>• Review of RMC minutes and items for advice and action</li> <li>• Risk dashboard, summary of key and changing risks along with incident reports</li> <li>• Report by chair of RMC</li> <li>• Compliance Statement</li> </ul>	Council meeting that follows RMC meeting
7	SSA Trust	<ul style="list-style-type: none"> <li>• Principal's Report</li> <li>• Principal's half yearly report</li> </ul>	~ 8 Meetings p.a.

## Appendix Two Internal Risk Committee

<b>Name</b>	<b>Role</b>
Karen Gorrie	<i>Deputy Principal Chair of Internal Risk Committee</i>
Toni Williams	<i>Director Business and Operations SSA</i>
Mary Surtees	<i>Assistant Head of Primary – Wellbeing &amp; Operations (P-6) WH &amp; S Officer and Primary School Representative</i>
Greg Anderson	<i>CIO Technology SSA Schools</i>
Helen Lobegeiger	<i>Head of Sport</i>
Kate Curran	<i>Director of Human Resources</i>
Steve Fleming	<i>Facilities Manager SSA Schools</i>
Lesla Fowler	<i>Head of Boarding</i>

<b>Scope of the Internal Risk Committee</b>		<b>Examples</b>
<b>People</b>	Health and safety of staff Health and safety of students Transport of students Employment and induction of new staff members Ethics Staff training	Staff workloads and conditions, for example - ergonomics Health Centre management Bus zones Drop off and Pick up zones Blue Card audits Enforcing rules and policies
<b>Policy and Process</b>	Documents and Policy Legislation Technology Critical Incidence	Policy Review Contracts and external providers User policy and security features Review of Evacuation procedures
<b>Property</b>	Equipment and facilities Grounds Security	Maintenance Safety at sporting facilities and playgrounds Evacuation & Lock Down capabilities
<b>Product</b>	Curriculum Events and Excursions	Program and resources Activity Risk Assessments

## Appendix Three St Margaret's Activity Risk Management Flowchart

