Risk Management Policy

Document Title	NQS7.61 Risk Management Policy	Version	1
Date Approved	March 2025	Date for Review	March 2028
Warning - Ensure you are using the latest version of this policy.			
DCC Network/All Organisation Information/Policies/Quality Area 7- Governance and Leadership			

1. Policy Statement

Risk occurs at different levels across an organisation, from business risks that may affect an organisation's ability to continue operating, to day-to-day hazards that may endanger the wellbeing of children, families, workers and visitors engaging with services. River Region Early Education has a commitment to identifying and managing risks in order to ensure the sustainability of the organisation, to protect children from harm and hazard, to safeguard the health and wellbeing of workers and visitors, and to support children to assess and manage risk.

Feedback from River Region Early Education families about how to support children to be adventurous and manage risk indicates they value positive encouragement, collaboratively setting boundaries and shared rules based on the capacity of each child and actively supervising while also encouraging independence.

2. Rationale

Risk management refers to several distinct and overlapping aspects of the identification of risks and hazards, with some governed by law and regulation. Education and Care Services National Law requires services to ensure that every reasonable precaution is taken to protect children from harm and from any hazard likely to cause injury and Education and Care Services National Regulation has specific requirements regarding risk assessments for excursions, sleep and rest, potential emergences, and transport and arrival of children. Work Health and Safety law and regulations require businesses to manage hazards and risks to workers' health and safety and, although not specifically regulated, a key component of good governance is the identification of strategic, financial, operational and reputational risks. The Early Years Learning Framework (EYLF) recognises the importance of supporting children to take calculated risks in play, learning and decision-making in the development of their identity, connections, wellbeing, and confidence. This policy guides employees and Board members in how risks and hazards are identified, assessed, managed and documented.

3. Scope

This policy applies to all employees, including part-time, full-time and casual employees, students, trainees, and volunteers, including Board members.

4. Responsibilities

It is the responsibility of the Board as Approved Provider to ensure that:

- Every reasonable precaution is taken to protect children being educated and cared for by services from harm and from any hazard likely to cause injury,
- A system is developed and maintained to identify, control, and review child health and safety risks, as outlined in *NQS2.60 Child Safety and Protection Policy*, and

- A sleep and rest risk assessment is conducted in accordance with regulation at least once every 12 months, as outlined in *NQS2.15 Sleep and Rest Policy*,
- A risk assessment is conducted in accordance with regulation at least once every 12 months to identify potential emergencies that are relevant to services, as outlined in *NQS2.80 Emergency Management and Evacuation Policy*,
- A risk assessment is carried out in accordance with regulation before each excursion and at least once every 12 months for regular outings, as outlined in *NQS2.90 Excursion and Incursion Policy*,
- A risk assessment is carried out in accordance with regulation at least once every 12 months with regard to the safe arrival of children travelling between education and early childhood services, as outlined in *NQS2.23 Safe Transport and Arrival Policy*,
- A risk assessment is carried out in accordance with regulation at least once every 12 months with regard to the transportation of children by services other than for excursions, as outlined in *NQS2.23 Safe Transport and Arrival Policy*,
- A system is developed and maintained to identify, control, and review workplace health and safety risks, as outlined in *NQS4.50 Workplace Health and Safety Policy*, and
- Systems of risk management and financial and internal controls are established and monitored, including the development and annual review of an organisational risk register, to ensure the solvency, financial strength and good performance of the organisation, as outlined in *NQS7.56 Governance and Organisation Management Policy*.

It is the responsibility of the General Manager to:

- Carry out or delegate the responsibilities of the Board as detailed above*,*
- Support the Leadership Team, Nominated Supervisors and the Quality Coordinator in the development, review, approval and documentation of risk assessments, and
- Support Nominated Supervisors to manage their understanding and support for children's risky play in programming and learning experiences.

It is the responsibility of the Quality Coordinator to:

- Manage the organisation's risk management framework, including the collaborative development and annual review of organisational risk assessments that includes an organisational risk register, child health and safety risk assessment, and workplace health and safety risk assessment,
- Manage accountability for actions resulting from organisational risk assessments,
- Support Nominated Supervisors to develop, review and document service risk assessments in line with regulation and the RREE risk management framework, and
- Support Workplace Health and Safety Representatives and employees in systems related to the identification of hazards and the minimisation or elimination of risks.

It is the responsibility of Nominated Supervisors to:

- Ensure that risk assessments are developed, reviewed and documented in line with regulation, including for excursions, sleep and rest, potential emergencies, and transport and arrival of children,
- Ensure that non-regulated risk assessments are developed, reviewed and documented in line with the RREE risk management framework,
- Manage accountability for actions resulting from service risk assessments,
- Ensure that educators have the opportunity to contribute to and develop risk assessments,

- Ensure that educators understand their responsibilities in implementing risk management controls and identifying new hazards and risks,
- Support educators to manage their understanding and support for children's risky play in programming and learning experiences and how this might be guided by risk assessments, and
- Keep families informed of risk assessments related to children and, where reasonable, include them in the development or review of any risk assessments related to risky play.

It is the responsibility of employees to:

- Be vigilant in identifying and reporting hazards that pose a risk to the health, safety, or wellbeing of any person and act immediately to manage, minimise or eliminate risk where this is reasonably possible,
- Familiarise themselves with risk assessments relevant to their work and follow risk management approach, controls and procedures,
- When working with children,
  - Encourage children to be adventurous, to try new experiences and ways of thinking and doing and to take calculated risks when playing,
  - Involve children in the assessment of risk and in setting boundaries and establishing shared rules,
  - Consider the benefits of risky play and how this can be balanced with risk management controls when developing a risk assessment or supervising and engaging with children,
  - Employ dynamic risk management during experiences and risky play to balance observation and intervention, and
  - Communicate with and involve families and children in discussions around risk management controls and the benefits of risky play.

5. Definitions

Hazard – anything that could cause harm, such as a gate latch that is faulty, a repetitive work practice, or a contractor on site using a noisy power tool.

Risk – the likelihood a hazard may cause harm and how serious that harm might be.

Risky play – adventurous play experiences that create opportunities for children to explore and test their own capacities, make calculated decisions about risks, and grow as capable, resourceful and resilient children.

Risk-benefit assessment - an approach to risk assessment in which risks and benefits are considered alongside each other. It allows services to balance their duty of care for children with opportunities for children to explore boundaries and be involved in decision-making about risk.

Dynamic risk management – real-time decisions and actions educators take during activities.

6. Guidelines

River Region Early Education's risk management framework provides a hierarchy of interconnected risk assessments. Each risk assessment has the following components:

1. **Identify hazards** – what has the potential to cause harm,
2. **Assess risks** – what is the nature, the likelihood, and consequences of the harm,

3. **Control risks** – how can the hazard be eliminated, or its effects minimised in a way that is reasonably practical, and

4. **Review control measures** – have the controls successfully eliminated or minimised the risk of harm.

All risk assessments related to child health and safety include consideration of supervision.

a) Risk management framework – annual organisational risk assessments

Organisational Risk Register

The Organisational Risk Register identifies all areas of business risk, including strategic, financial, and operational. The Risk Register is an organisational risk assessment and:

- It is reviewed annually,
- It is approved by the Board,
- Informs the Operational Plan, and
- Includes risks related to regulatory compliance, child health and safety and workplace health and safety.

Child Health and Safety Risk Assessment

The Child Health and Safety Risk Assessment identifies all areas of operational risk related to protecting children from harm and hazards likely to cause injury. It is an organisational risk assessment and:

- It is reviewed annually,
- It is approved by the Leadership Team and presented to the Board,
- Informs the development and review of policies, procedures and systems, and
- Includes risks related to potential emergencies, medical emergencies, supervision, safe environment, and transitions.

Workplace Health and Safety Risk Assessment

The Workplace Health and Safety Risk Assessment identifies all areas of operational risk related to protecting workers from harm and hazards likely to cause injury. It is an organisational risk assessment and:

- It is reviewed annually,
- It is approved by the Workplace Health and Safety Committee and presented to the Leadership Team and Board,

Organisational Risk Register

Child Health and Safety Risk Assessment (inc potential emergencies)

Workplace Health and Safety Risk Assessment

Indoor/Outdoor Environment Risk Assessments

Hazard risk assessments (per hazard if needed)

Sleep and Rest Risk Assessment

Regular Excursion Risk Assessment

Visitors Risk Assessment

Safe Arrival Risk Assessment (if needed)

Transportation Risk Assessment (if needed)

Excursion and incursion risk assessments (per event)

Special event risk assessment (per event)

New or one-off experiences / equipment risk assessment as needed

- Informs the development and review of policies, procedures and systems, and
- Includes risks related to physical environment, health, psychosocial, travel, emergencies, and medical emergencies.

Risk assessment	Type	Frequency	Responsibility
Organisational Risk Register	Organisational	Annual	Board
Child Health and Safety Risk Assessment	Organisational	Annual	Leadership
WHS Safety Risk Assessment	Organisational	Annual	WHS

b) Risk management framework – annual service risk assessments

Each service is responsible for the development and annual review of the following risk assessments that are primarily related to child health and safety:

- *Indoor Environment Risk Assessment,*
- *Outdoor Environment Risk Assessment*,
- *Sleep and Rest Risk Assessment* (required under Reg 84C),
- *Regular Excursion Risk Assessment* (required under Reg 101),
- *Visitor Risk Assessment*,
- *Safe Arrival Risk Assessment* (required under Reg 102AAC if children are travelling between education and early childhood services), and
- *Safe Transport Risk Assessment* (required under Reg 102B if children are being transported by the service other than for excursion).

These risk assessments should:

- Include consideration of all regular activities, experiences, equipment, environment and people,
- Be reviewed and updated during the year where there is any change to risks or hazards, such as new equipment, changes to the environment, a new regular activity, or a child enrolled with individual needs, and after an incident or near miss,
- Identify actions needed to minimise or control risks, and
- Be communicated to educators, families and children.

Risk assessment	Type	Frequency	Responsibility
Indoor Environment Risk Assessment	Service	Annual	NS
Outdoor Environment Risk Assessment	Service	Annual	NS
Sleep and Rest Risk Assessment	Service	Annual	NS
Regular Excursion Risk Assessment	Service	Annual	NS
Visitor Risk Assessment	Service	Annual	NS
Safe Arrival Risk Assessment	Service	Annual	NS
Safe Transport Risk Assessment	Service	Annual	NS

c) Risk management framework – day-to-day and ad hoc service risk assessments

Each service is responsible for completing the following risk assessments for each relevant event or activity:
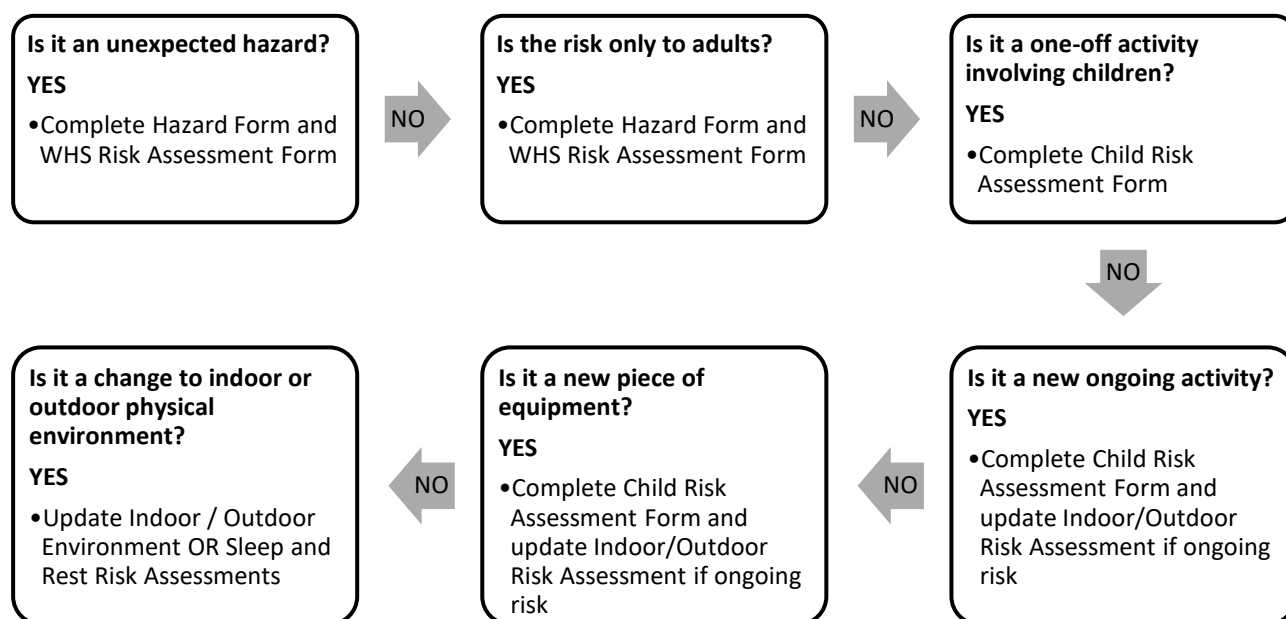
- *Excursion Planning Tool* (per excursion event and required under Reg 101),
- *Incursion Planning Tool* (per incursion event or series of events), and
- *Special Event Planning Tool* (per special event, such as celebration or special visitors day).

Risk assessment	Type	Frequency	Responsibility
Excursion Planning Tool	Service	Per event	NS
Incursion Planning Tool	Service	Per event	NS
Special Event Planning Tool	Service	Per event	NS

Each service is responsible for completing the following *ad hoc* risk assessments for unexpected hazards and new or one-off equipment or activities:

- *WHS Risk Assessment Form* for any unexpected hazards identified when completing a *Hazard Form* and the risk is considered to be moderate or high and any risks that do not involve children, and
- *Child Risk Assessment Form* for anything new or one-off that might pose a risk of injury or harm to children, such as a new experience or piece of equipment (if used / occurring regularly, can be added to the relevant annual risk assessment on review). This form includes a risk-benefit assessment. Children can be involved in the risk assessment process by using *ACECQA Risk Assessment Tool for Children*.

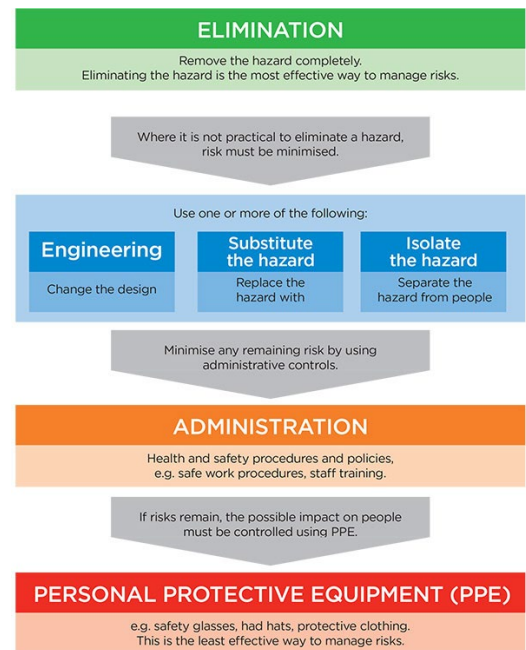The following provides some guidance as to which risk assessment form or template to use:

Is it an unexpected hazard?
YES
- Complete Hazard Form and WHS Risk Assessment Form

NO →

Is the risk only to adults?
YES
- Complete Hazard Form and WHS Risk Assessment Form

NO →

Is it a one-off activity involving children?
YES
- Complete Child Risk Assessment Form

NO ↓

Is it a new ongoing activity?
YES
- Complete Child Risk Assessment Form and update Indoor/Outdoor Risk Assessment if ongoing risk

← NO

Is it a new piece of equipment?
YES
- Complete Child Risk Assessment Form and update Indoor/Outdoor Risk Assessment if ongoing risk

← NO

Is it a change to indoor or outdoor physical environment?
YES
- Update Indoor / Outdoor Environment OR Sleep and Rest Risk Assessments

Risk assessment	Type	Frequency	Responsibility
WHS Risk Assessment Form	Service	Ad hoc	NS/WHS Rep
Child Risk Assessment Form	Service	Ad hoc	NS
ACECQA Risk Assessment Tool for Children	Service	Ad hoc	NS

d) Risk controls

There is a hierarchy of control measures, ranked from the highest level of protection and reliability to the lowest.

- The highest level of control is considered first, for example eliminating the risk as the most effective control where it is reasonably practical.
- One or more controls may be needed in order to sustainably minimise risk.
- Where it is not possible to eliminate the hazard, engineering, substitution, and/or isolation can minimise risk, as can administrative controls such as signage, training, and procedures.
- Personal Protective Equipment (PPE) without other controls is the least effective way to manage risk.

Controlling risks is an ongoing process that must be reviewed regularly. Control measures are reviewed and revised when an incident occurs, the control measure is not working, a new risk or hazard is identified, or consultation suggests a review is necessary.

e) Risk assessment templates

River Region Early Education uses risk assessment templates that identify:

- Areas to consider,
- Identified issues,
- Potential outcomes,
- Risk rating (without controls),
- Risk management approach,
- Action(s) needed, and
- Revised risk rating.

In some simpler templates, areas to consider, identified issues and/or potential outcomes are combined.

Areas to consider	These should reflect regulation and other areas of priority
Identified issues	What are we worried about? Where is there particular risk?
Potential outcomes	These align with Risk Consequence Ratings Describes type and level of harm or disruption Helps determine risk rating (if 'death' then Extreme or High)

Risk rating (without controls)	The risk rating with minimal daily controls. Use the tables below to determine 'consequence', 'likelihood' and then risk rating.
Risk management approach	Policies that guide approach. Checklists, guides, plans or audits. Dot points of key aspects of approach. May include training, educator support, or communication.
Action(s) needed	Is there anything missing or not working well? Is the approach being implemented? Are there important aspects of the approach that are not reflected in policy (update policy)?
Revised risk rating	The risk rating with all controls in place - use the matrix to determine the rating. Revised ratings above 'Low' need daily diligence and may need further actions. Initial risk ratings of Extreme are unlikely to be revised below Moderate

Risk Matrix

A risk matrix guides the assessment of the likelihood and consequences of harm related to any identified hazard. Each hazard is assessed against the Risk Consequence Rating and Risk Likelihood Rating and a risk rating identified that is either low, moderate, high or extreme.

		Consequence				
		Insignificant	**Minor**	**Moderate**	**Major**	**Catastrophic**
Likelihood	**Almost certain**	Moderate	High	High	Extreme	Extreme
	Likely	Moderate	Moderate	High	Extreme	Extreme
	Possible	Low	Moderate	High	High	Extreme
	Unlikely	Low	Low	Moderate	High	High
	Rare	Low	Low	Low	Moderate	High

Risk Likelihood Rating

Level	Descriptor	Description
5	Almost certain	It is expected to occur in most circumstances (weekly)
4	Likely	Will probably occur in most circumstances (monthly)
3	Possible	Might occur at some stage (annually)
2	Unlikely	Could occur at some time (2 to 5 years)
1	Rare	May occur in exceptional circumstances (5 to 30 years)

Risk Consequence Rating

Rating		Possible consequences
Catastrophic	5	• Incident resulting in death or serious injury • Major disruption of multiple services for more than half a day • Unexpected / unplanned resignation of GM • Loss of Approved Provider status • Financial loss of more than $100,000 • Major civil law suit and/or criminal charges laid • Public enquiry or sustained adverse national/state media coverage
Major	4	• Incident resulting in extensive injuries or disfigurement • Major disruption of multiple services for up to half a day • Serious incident/injury or dangerous near miss • Unexpected / unplanned resignation of several senior employees • A&R of Significant Improvement Needed across multiple areas/services • Financial loss between $50,000 and $100,000 • Civil law suits against the company or individuals • Significant adverse national/state media coverage or internal inquiry
Moderate	3	• Incident resulting in hospitalisation or surgery required • Major disruption of single service for up to half a day • Lost time due to workplace injury • Minor child injury • Unexpected / unplanned resignation of a key employee • A&R of Significant Improvement Needed in single area/service • Financial loss between $25,000 and $50,000 • Significant level of complaints / incidents with potential legal action • Significant adverse local media coverage
Minor	2	• Incident with increased level of medical care or supervision needed • Minor disruption of service of between 1 to 2 days • Minor workplace injury with no lost time • Unexpected / unplanned resignation of several employees • Financial loss between $10,000 and $25,000 • Single complaint / incident with potential legal action
Insignificant	1	• No injury or increased level of medical care or supervision (near miss) • Minor disruption of service for up to half a day • Unexpected / unplanned resignation of single employee • Financial loss up to $10,000 • Minor complaint / incident

f) Risky play and risk-benefit assessment

Risk play is important to children's development and is supported by Play Australia, ACECQA and the EYLF 2.0. Engaging in risky play helps children express their emotions, develop self-awareness, problem-solving and life skills and contributes to their physical development.

Risky play should:

- Be relevant to the age and stage of development and capacity of the child and the environment,
- Allow children to explore and test their own ability and develop and identify their own risk appetite, including checking their environment, setting boundaries and establishing shared rules,
- Encouraging children to feel safe, ask for help and say no if needed to ensure children have agency and aren't pushed into risky behaviour against their will,
- Be supported by appropriate levels of supervision and intervention, such as being close by and only intervening when help is needed, and
- Include positive encouragement, reassurance and role modelling of courageous and risk aware behaviours.

To support children during risky play, River Region Early Education provides the following strategies:

- *Child Risk Assessment Form* includes identification of risks and benefits,
- *ACECQA Risk Assessment Tool for Children* involves children in the assessment and management of risk, and
- *Dynamic Risk Management Guide* supports educators to balance observation and intervention during risky play.

The Canadian Paediatric Society breaks risky play into eight categories and uses the following to support doctors to give families advice on risky play activities.

Categories	Examples
Playing at height	Climbing, jumping, balancing at height
Playing at speed	Bicycling at high speed, sliding, running
Play involving tools	Supervised activities involving an axe, saw, knife, hammer, or ropes
Play involving potentially dangerous elements	Playing near fire or water
Rough-and-tumble play	Wrestling, play-fighting, fencing with sticks
Play with risk for disappearing or getting lost	Exploring play spaces with limited supervision (e.g. hiding behind bushes)
Play involving impacts	Crashing into something or someone, perhaps repeatedly and only for fun
Vicarious play	Experiencing the thrill of watching other (often older) children engaging in risky play

7. Relevant Legislation, Regulations and Standards

Education and Care Services National Law	
167	Offence relating to protection of children from harm and hazards

NSW Work Health and Safety Regulation 2017	
32-38	Managing risks to health and safety
Education and Care Services National Regulation	
84C	Risk assessment for purposes of sleep and rest policies and procedures
97	Emergency and evacuation procedures
100	Risk assessment must be conducted before excursion
102AAC	Risk assessment for the purposes of safe arrival of children policies and procedures
102C	Conduct of risk assessment for transporting of children by the education and care service
National Quality Standards	
1.1.1	Curriculum decision-making contributes to each child's learning and development outcomes in relation to their identity, connection with community, wellbeing, confidence as learners and effectiveness as communicators.
1.2.3	Each child's agency is promoted, enabling them to make choices and decisions that influence events and their world.
2.2.1	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard.
7.1.2	Systems are in place to manage risk and enable the effective management and operation of a quality service.
Child Safe Standards	
1	Child safety is embedded in organisational leadership, governance and culture
8	Physical and online environments minimise the opportunity for abuse or other kinds of harm to occur
10	Policies and procedures document how the organisation is child safe
Early Years Learning Framework Learning Outcomes	
1	Children have a strong sense of identity
2	Children are connected with and contribute to their world
3	Children have a strong sense of wellbeing
4	Children are confident and involved learners
5	Children are effective communicators
Early Years Learning Framework Principles	
	Secure, respectful, and reciprocal relationships
	Critical reflection and ongoing professional learning
Early Years Learning Framework Practices	
	Holistic, integrated, and interconnected approaches

	Responsiveness to children
	Play-based learning and intentionality
	Learning environments

8. Related Documents

Doc #	Attachments
NQS7.61A	Child Risk Assessment Form
NQS7.61B	ACECQA Risk Assessment Tool for Children
NQS7.61C	Dynamic Risk Management Guide (excerpt from Risk Benefit Assessment Toolkit for Outdoor Play

Doc #	Intersections with other key documents
NQS7.56	Governance and Organisation Management Policy
NQS2.60	Child Safety and Protection Policy
NQS2.15	Sleep and Rest Policy
NQS2.15A	Sleep and Rest Risk Assessment Template
NQS2.80	Emergency Management and Evacuation Policy
NQS2.90	Excursion and Incursion Policy
NQS2.90A	Excursion Planning Tool
NQS2.90H	Incursion Planning Tool
NQS2.90E	Regular Excursion Risk Assessment Template
NQS2.23	Safe Transport and Arrival Policy
NQS2.23A	Safe Transport Risk Assessment Template
NQS2.23B	Safe Arrival Risk Assessment Template
NQS4.50	Workplace Health and Safety Policy
NQS4.50B	WHS Risk Assessment Form
NQS7.62B	Visitors Risk Assessment Template
NQS3.20E	Indoor Environment Risk Assessment Template
NQS3.20F	Outdoor Environment Risk Assessment Template

9. Document Control

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NQS7.61	Risk Management Policy	1	March 2025	March 2028