



Our Lady of Lourdes Primary School is a school which operates with the consent of the Catholic Archbishop of Melbourne and is owned, operated and governed by Melbourne Archdiocese Catholic Schools Ltd (MACS). Our Lady of Lourdes Primary School acknowledges that risk management is an integral part of sound management practice and an essential element of good corporate governance and responsible stewardship, as it improves decision-making and enhances outcomes and accountability. The MACS Board is accountable for overseeing and monitoring the assessment and management of risk and compliance at Our Lady of Lourdes Primary School. Including child safety risks as legislated under the Ministerial Order 1359 – Implementing the Child Safe Standards – Managing the risk of child abuse in schools and school boarding premises (MO 1359).

## Purpose

This policy ensures a consistent process for the identification, assessment, treatment and monitoring of risk across the school and is consistent with the International Standard for Risk Management (AS/NZS ISO 31000:2018) and the Enterprise Risk Management Framework (the Framework).

## Scope

This policy applies to Our Lady of Lourdes Primary School and all its activities to ensure a clear and transparent approach in managing risk.

## Principles

Our Lady of Lourdes Primary School applies the following principles to risk management. Risk management:

- creates and protects value
- is systematic, structured and timely
- accounts for human and cultural factors
- promotes a positive risk-aware culture
- is responsive to change
- is integrated into processes and decision-making
- is transparent and inclusive
- leads to continuous improvement

## Policy

Our Lady of Lourdes Primary School is committed to proactively managing risks in line with MACS's Framework. This includes maintaining a current risk register that covers all school risks including child safety risks, refer to School Risk Register template on CEVN.

Our Lady of Lourdes Primary School Principal is responsible for risk management within the school including monitoring of existing risks and any emerging risks that may impact the school or MACS as a whole and reporting high and extreme risks to the regional general manager and the Chief Risk Officer.

## Roles, responsibilities and reporting

Table 1 provides an overview of key roles and responsibilities for risk management at Our Lady of Lourdes Primary School:

Role	Responsibility	Reporting frequency
Principal	Contextualise and implement the Framework and the School Risk Management Policy	Annual
	Develop and maintain the Our Lady of Lourdes Primary School risk management process for assessing, evaluating and treating risk	Ongoing
	Maintain a current risk register including child safety risks	Ongoing
	Allocate risk owners to all identified risks and roles and responsibilities of staff in risk management of Our Lady of Lourdes Primary School	Ongoing
	Allocate roles and responsibilities of staff in risk management of Our Lady of Lourdes Primary School	Ongoing
	Ensure risk assessments for school activities and projects are undertaken	As required
	Escalate high and extreme rated risks to the Regional General Manager.	As soon as practicable
	Lead and monitor positive risk culture	Ongoing
	Sign off the annual risk management compliance attestation	Annual
All staff	Demonstrate positive risk culture	Ongoing
	Apply sound and informed risk management principles to decision-making, practice and operations	Ongoing
	Report identified risks to the principal	As required
	Proactively manage risks within own work remit	Ongoing

## Risk monitoring, escalation guide and reporting requirements

Table 2 provides an overview of the reporting escalation at Our Lady of Lourdes Primary School:

Role	Monitoring, escalation and reporting requirement
Low	The risk falls well within the acceptable level of risk appetite. Accountability of the risk is to be managed by Principal. The principal is to monitor the risk at an appropriate frequency
Medium	The risk falls within the acceptable level of risk appetite. Accountability of the risk is to be managed by the principal. The risk may either be managed or accepted without further treatment, provided that it is at least monitored on a biannual basis.
	The risk may fall outside the acceptable level of risk appetite.

Role	Monitoring, escalation and reporting requirement
High	<p>Accountability of the risk is to be managed by principal.</p> <p>Immediate attention and response needed.</p> <p>The risk requires a risk treatment plan to reduce the level of risk in line with the risk appetite statement.</p> <p>Active monitoring of the risk and risk treatments is required and must be integrated into reporting requirements.</p> <p>The risk must be reported to the Regional General Manager.</p>
Extreme	<p>The risk falls outside the acceptable level of risk appetite.</p> <p>Accountability of the risk is to be managed by Principal with assistance from the Regional General Manager.</p> <p>Immediate attention and response required.</p> <p>The risk requires a risk treatment plan to reduce the level of risk in line with the risk appetite statement.</p> <p>Active monitoring of the risk and risk treatments are required and must be integrated into reporting requirements.</p> <p>The risk must be reported to the Regional General Manager for escalation to the Chief Risk Officer.</p>

## Procedures

This Procedure outlines how Our Lady of Lourdes Primary School will manage risk and should be read in conjunction with the Framework.

### Coordination and communication

Risk management activities are implemented and coordinated by the Our Lady of Lourdes Primary School principal, or their delegate. This includes the communication of advice, guidance and support across the school.

### Risk assessment and treatment

Our Lady of Lourdes Primary School principal will work with their teams to develop risk profiles in accordance with the Risk Appetite Statement, enterprise risks and strategic priorities. Risk profiles must include all information relating to the risks, including the causes and impacts, ratings, control and treatment activities, alignment with key risk indicators and risk appetite.

Risk assessments must be undertaken before commencing a new project or activity and reviewed at least annually, or more frequently as required by residual rating, risk changes or project milestones.

Risks can be identified using various methods including but not limited to:

- team-based brainstorming with experienced staff
- environmental scanning
- annual strategic planning
- examination and analysis of past reports, trends and incidents
- regular internal and/or external compliance reviews
- internal and/or external audit.

When a risk is identified, a risk owner is assigned by the Our Lady of Lourdes Primary School principal. The risk owner must assess risk, controls and treatment measures in accordance with the Risk Assessment Criteria (Section 6 of the Framework). Where treatments are required, the risk owner is required to ensure the treatment is completed within required timeframes and existing business processes are updated accordingly.

### Reporting and monitoring

Risk owners must review and update their risk profiles at least every three months to ensure all current and emerging risks are captured, controls identified, and risk treatment plans are implemented effectively.

Risk owners must provide an update to the Our Lady of Lourdes Primary School principal on all major risks within their areas including progress updates on treatment plans. Major risks are risks with high or extreme residual risk rating.

The principal will monitor the school risk register to identify new and updated risks and will action as appropriate.

**Risks outside acceptable levels and escalation**

Our Lady of Lourdes Primary School principal must escalate all actions and activities that fall outside the relevant risk appetite as per the Risk Appetite Statement to the Regional General Manager. Click or tap here to enter text.

The regional general manager will escalate extreme risks to the Chief Risk Officer, who will assess escalated matters to determine actions required to reduce the risk to an acceptable level.

**Three Lines of Defence**

The Three Lines of Defence model provides a simple and effective way to enhance communications on risk management and control by clarifying essential roles and duties. Responsibility refers to the ultimate responsibility for actions, decisions, and management of nominated activities. This does not mean that the responsible party must deliver the action, but, if it delegates responsibilities, it must seek assurance that the activity is, and continues to be appropriate and is progressing as scheduled. MACS’s risk accountabilities and responsibilities are based on the Three Lines of Defence model as shown in Table 3.

*Table 3: Three lines of defence model*



**Definitions**

**Approved**

Authorised in writing, as evidenced by signature of a nominated delegate

**Child safety**

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 suspicions, incidents, disclosures or allegations of child abuse (Ministerial Order No. 1359)

**Control**

A measure that modifies risk.

## **Delegation**

The powers, authority, duties and functions delegated to a role, position or group (such as a committee) by the MACS board and contained in a delegation instrument

## **Enterprise Risk Management Framework**

The Enterprise Risk Management Framework provides the overall framework, direction and oversight for the systematic, disciplined and consistent identification and assessment of risks (including opportunities), and for transparent and efficient management. This policy supports the MACS Risk Management Framework, which has been approved by the MACS Board. Refer to the MACS Risk Management Framework for further elaboration on the following definitions

- the risk rating methodology, including the development of risk thresholds for defined risk consequences
- risk appetite
- how controls should be managed within defined risk thresholds
- the objectives of the risk management program

## **Framework**

A board-approved overarching governance structure to enable compliance by MACS and its subsidiaries and MACS schools/MACSEYE services with a range of regulatory requirements, and to ensure good governance in the operations of MACS and its subsidiaries and MACS schools/MACSEYE services

## **Melbourne Catholic Archdiocese Schools Ltd (MACS)**

MACS is a reference to Melbourne Archdiocese Catholic Schools Ltd, and / or its subsidiaries, MACSS and/or MACSEYE (*as the context requires*)

## **MACS board or board**

The board of Melbourne Archdiocese Catholic Schools Ltd (MACS), being also the board of Melbourne Archdiocese Catholic Specialist Schools Ltd (MACSS) and the board of Melbourne Archdiocese Catholic Schools Early Years Education Ltd (MACSEYE) in an ex officio capacity (*as the context requires*)

## **MACS executive**

A member of the executive leadership team of MACS

## **MACS office**

Staff employed in MACS offices at James Gould House, Catholic Leadership Centre and MACS regional offices

## **MACS school or school**

A school which operates with the consent of the Catholic Archbishop of Melbourne and is owned, operated and governed by MACS, directly or through MACSS (*as the context requires*). References to schools or MACS schools also includes boarding premises of schools operated by MACS and specialist schools operated by MACSS.

## **Major risks**

Risks that have been assessed in line with the MACS Enterprise Risk Management Framework and have a residual rating of High or Extreme.

## **Policy**

A high-level, principles-based directive that must be complied with across MACS, MACSS and MACSEYE

## **Principal/director**

Individual appointed as principal by MACS in MACS schools or director in MACSEYE service

## **Procedure**

A step-by-step or detailed instruction for the implementation of MACS policy that is mandatory across MACS, MACS schools and MACSEYE

**Risk**

The effect of uncertainty on objectives

**Risk management**

The coordinated activities to direct and control an organisation with regard to risk

**Risk register**

All schools are required to maintain a risk register. The purpose of a school risk register is to identify, document, and manage or control risks in the school environment. It is expected that schools will manage and monitor any risks, the current controls in place, and regularly review their risk assessment and responsibility for risk management. Refer to CEVN for School Risk Register template.

**Student**

Student means a person who is enrolled at or attends a MACS school.

**Treatment**

Treatment is a scheduled action that must be implemented to reduce risk priority to an acceptable level.

## Related policies and resources

**Supporting documents**

Our Lady of Lourdes Primary School Risk Register – Template (published on CEVN)  
Risk Assessment Criteria (published on CEVN)

**Related MACS policies**

Enterprise Risk Management Framework  
Occupational Health and Safety Policy  
Our Lady of Lourdes Primary School Child Safety and Wellbeing Policy

## Legislation and standards

Corporations Act 2001  
Australian Charities and Not-for-profits Commission Act 2012  
Education and Training Reform Act 2006  
Education and Training Reform Regulations 2017  
Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the risk of child abuse in schools and school boarding premises  
Child Wellbeing and Safety Act 2005  
Education Services for Overseas Students Act 2000  
National Code of Practice for Providers of Education and Training to Overseas Students 2018  
National Vocational Education and Training Regulator Act 2011  
Standards for Registered Training Organisations (RTOs) 2015  
Education and Care Services National Law Act 2010  
Education and Care Services National Regulations 2010  
International Standard ISO 31000:2018 *Risk management – Guidelines*

## Policy information table

<b>Responsible director</b>	Director, Governance and Strategy
<b>Policy owner</b>	Chief Risk Officer
<b>Approving authority</b>	Board
<b>Assigned board committee</b>	Child Safety and Risk Management
<b>Approval date</b>	7 February 2023

<b>Risk rating</b>	Extreme
<b>Date of next review</b>	February 2024
<b>Publication details</b>	CEVN

<b>POLICY DATABASE INFORMATION</b>	
<b>Assigned Framework</b>	Enterprise Risk Management
<b>Related documents</b>	Use dot points to identify any document that is attached to this policy as an attachment, appendix, template that will be included as an active link in the document.
<b>Superseded documents</b>	School Risk Management Policy – v1.0 – 2021
<b>New policy</b>	