

## Guideline – Managing Safeguarding Risks

### Introduction

The National Catholic Safeguarding Standards (Standard 8) require all Church entities to effectively manage risks of abuse associated with their activities, ministries, and services. These requirements ensure that entities maintain a proactive approach to safeguarding and fostering safe and supportive environments.

The Archdiocese of Brisbane is committed to a robust Risk Management Framework, including risk management policies and procedures that apply to all activities, ministries, and services, irrespective of risk levels.

All Archdiocesan workers—including clergy, employees, and volunteers—share responsibility for managing abuse risks within their areas of responsibility, as far as is reasonably practicable.

### Purpose

This guideline outlines an approach to managing abuse risks that may be associated with activities, ministries and services, and supports compliance with the Archdiocese’s risk management policy and procedures.

It is intended primarily for parishes, ministries, and services, excluding those provided by Centacare Brisbane and Brisbane Catholic Education.

This guideline should be read in conjunction with the Archdiocesan Risk Management Policy and Procedures to ensure a consistent and comprehensive approach to managing risks.

### Risk Assessments

Risk management is the systematic process of identifying, assessing, and controlling risks that could lead to harmful outcomes. In the context of safeguarding, a risk refers to any situation or condition that creates the potential for abuse, including physical, sexual, emotional, spiritual, and online abuse, as well as neglect and exploitation.

All activities, ministries, and services must undergo a risk assessment for abuse risks, in addition to workplace health and safety (WHS) risks. Risk assessments must be completed before an activity, ministry, or service commences. The Archdiocesan Risk Management Procedure sets out how to conduct risk assessments.

### Risk Assessment Process

The risk assessment process follows these key steps:

#### 1. Identifying Risks

Identifying abuse risks allows organisations to assess and control potential harmful outcomes. Common abuse risks include (but are not limited to):

- The involvement of unsuitable or high-risk individuals
- Unnecessary or non-consensual physical contact
- Conducting activities in secluded, private or unmonitored settings



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- One-to-one activities (especially in private or unmonitored settings)
- Transporting children alone and unaccompanied
- Taking and sharing unauthorised photographs and videos
- Engaging alone with children online
- Insufficient supervision and oversight
- Undertaking personal care activities that a person is capable of doing themselves (e.g. dressing, toileting, showering)

*Note: This is not an exhaustive list. Risk assessments must consider specific contextual factors.*

\* Refer to the attached 'Safeguarding Risk Inventory' for further guidance on abuse risks and controls.

### 2. Assessing Risks

Once identified, each risk is assessed based on likelihood and consequences. The risk matrix in the Archdiocesan Risk Management Procedure should be used for this purpose.

Risk levels are classified as:

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| Extreme: | Very unsafe. The risk is unacceptable, and the activity must not proceed.    |
| High:    | Unsafe. Significant risk management controls are required before proceeding. |
| Medium:  | Not completely safe. Moderate controls are required to reduce risks.         |
| Low:     | Generally safe. Routine risk management controls are required.               |

### 3. Implementing Controls

A control is an action taken to reduce or eliminate an identified risk. Controls should be proportionate to the risk level. The higher the risk level, the more robust the control measures must be.

- Eliminate the risk (e.g. change the activity or location to remove the risk entirely).
- Reduce the risk through supervision, policy enforcement, training, and environmental modifications.
- Monitor the risk with ongoing oversight, reporting, and periodic review.

### 4. Reviewing Risks and Controls

Regular review and evaluation of risk assessments ensure that safeguarding measures remain effective. Risk assessments should be reviewed:

- At least annually;
- Whenever a significant change occurs (e.g. new location, new staff, emerging risks); and
- If concerns or incidents arise requiring reassessment of existing controls.

### **High-Risk & Special Events**

Under the *Working with Children (Risk Management and Screening) Act 2000* and the *Working with Children (Risk Management and Screening) Regulation 2020*, organisations that work with children must develop risk management plans for high-risk activities and special events involving children.

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High-risk activities or events involve increased risks of harm to children, which may arise due to:

- Involvement of external individuals or organisations.
- Large group gatherings.
- Overnight stays or prolonged accommodation.
- External venues or unfamiliar locations.
- Transporting children or vulnerable adults.
- One-on-one interactions between adults and children.
- Physical contact or high-risk activities.
- Online interactions.
- Hazardous environments or psychologically intense activities.

Examples of high-risk activities and events include (but are not limited to):

- Excursions, camps, and overnight retreats.
- Billeting (accommodating children with host families).
- One-on-one counselling in private settings.
- Large parish events (e.g. fetes, pilgrimages).
- High-risk recreational activities (e.g. rock climbing, water sports, horse riding).

*Note: This is not an exhaustive list.*

Parishes, ministries, and services are responsible for identifying high-risk activities and special events, preparing detailed risk management plans, and obtaining necessary approvals for those activities and events before proceeding.

### Approvals

Risk assessments must be completed and approved before an activity, ministry, or service takes place.

The relevant leadership group (e.g. Parish Council) should review risk assessments.

The Parish Priest or relevant manager must approve the risk assessment before implementation.

### Record Keeping

Maintaining records of risk assessments and associated management decisions is crucial for compliance and accountability. These records serve as evidence of due diligence and safeguarding compliance.

Risk assessments must be retained locally.

Records must be accessible for future reference and regulatory audits.

Documentation should be updated whenever a new risk assessment is conducted or revised.

## Safeguarding Risk Inventory

Hazard	Risk	Example Controls
Failure to comply with recruitment policies and procedures	<p>Infiltration of unsuitable/unsafe individuals</p> <p>Non-compliance with legal screening requirements</p> <p>Increased risk of abuse</p>	<p>Adhere to recruitment policies and procedures</p> <p>Register all volunteers</p> <p>Conduct screening checks on all workers, including criminal history, working with children Blue Cards, and character references</p> <p>Ensure workers complete the 'Prior Conduct Declaration' and disclose any past safeguarding concerns</p>
Failure to communicate expected behaviour standards	<p>Inappropriate behaviour</p> <p>Inability to identify inappropriate behaviour or misconduct</p> <p>Non-reporting of inappropriate behaviour or misconduct</p> <p>Increased risk of abuse</p>	<p>Require workers to read and sign the 'Safe Behaviour Code' and Code of Conduct</p> <p>Train workers on the 'Safe Behaviour Code' and Code of Conduct</p> <p>Inform children about expected behaviours in an age and capacity appropriate manner</p> <p>Reinforce behavioural expectations through ongoing training, regular communications and reminders</p>
Failure to complete safeguarding training	<p>Inability to identify grooming behaviour and abuse</p> <p>Non-reporting of grooming behaviour and abuse</p> <p>Non-compliance with legal reporting obligations</p> <p>Increased risk of abuse</p>	<p>Mandate safeguarding training for all workers, with periodic refresher training</p> <p>Provide specific training for workers in leadership roles or those directly supervising children and adults-at-risk</p> <p>Monitor and record completion of safeguarding training</p>
Failure to regulate one-on-one interactions	<p>Inappropriate behaviour</p> <p>Increased risk of abuse</p>	<p>Establish clear protocols for one-on-one interactions, including maintaining open and visible locations</p>

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Hazard	Risk	Example Controls
	Potential for false allegations	<p>Maintain direct line of sight, avoiding secluded and unmonitored settings</p> <p>Monitor all interactions through regular supervision, check-ins, and CCTV where appropriate</p> <p>Obtain prior written consent from parents/guardians for one-on-one interactions</p> <p>Mandate a second adult or an observer for high-risk one-on-one interactions</p>
Failure to regulate physical contact	<p>Inappropriate contact</p> <p>Increased risk of abuse</p> <p>Potential for false allegations</p>	<p>Train workers on appropriate and inappropriate physical contact, with clear guidelines and examples</p> <p>Inform children about physical contact boundaries in an age and capacity appropriate manner</p> <p>Obtain prior written consent from parents/guardians for physical contact activities</p> <p>Monitor interactions closely and intervene in cases of inappropriate contact</p> <p>Implement a no-contact policy where necessary for high-risk situations</p> <p>Document any necessary physical contact (e.g., first aid) and report concerns</p>
Using concealed, secluded, or unmonitored locations	<p>Person feeling isolated and afraid</p> <p>Inappropriate behaviour</p> <p>Increased risk of abuse</p> <p>Potential for false allegations</p>	<p>Prohibit activities in high-risk areas such as locked or secluded rooms</p> <p>Ensure a direct line of sight and appropriate lighting</p> <p>Use CCTV surveillance where appropriate, ensuring compliance with privacy regulations</p>

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Hazard	Risk	Example Controls
		Actively monitor interactions and conduct random supervision checks
Failure to adequately supervise	<p>Inappropriate behaviour</p> <p>Person wandering off or becoming lost</p> <p>Person left behind/stranded</p> <p>Person taken against their will</p> <p>Increased risk of abuse</p>	<p>Maintain safe worker-to-participant ratios based on age, needs, and activity type</p> <p>Encourage parental/guardian involvement and create a shared responsibility for supervision</p> <p>Implement a buddy system where children are always paired with another child</p> <p>Train workers on effective supervision strategies, including active engagement and situational awareness</p> <p>Use colour-coded lanyards or wristbands to identify authorised supervisors</p>
Failure to adequately manage arrivals/admissions and departures	<p>Infiltration of unsuitable/unsafe individuals</p> <p>Person left behind/stranded</p> <p>Person taken against their will</p> <p>Increased risk of abuse</p>	<p>Develop a structured protocol for arrivals/admissions and departures, including designated pick-up and drop-off points</p> <p>Use digital registration or sign-in/out sheets to track participant movement</p> <p>Train staff on handling uninvited attendees and how to remove individuals who pose a risk</p> <p>Ensure children are released only to parents/guardians or authorised persons with proper identification</p> <p>Implement staggered pick-up times to manage crowd control</p>

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Hazard	Risk	Example Controls
Failure to regulate online and social media interactions	Unauthorised, unsolicited, secretive contact Inappropriate online behaviour Breach of privacy Increased risk of abuse	Use secure, monitored communication platforms with clear usage policies Restrict access to personal contact details, ensuring workers do not communicate privately with participants Ensure communication remains professional and transparent, using group messages instead of private chats Train workers on online safety and responsible digital interactions Inform parents/guardians and children, about on online safety and responsible digital interactions Obtain prior written consent from parents/guardians for children to participate in online/digital activities and communications Implement digital audit trails for all communications Prohibit direct online/digital communication between workers and children that is unauthorised and for non-work or ministry purposes
Failure to adequately manage transportation	Unmonitored contact Inappropriate behaviour Person left behind/stranded Person taken/held against their will Increased risk of abuse Injuries through unsafe driving and traffic crashes	Obtain prior written consent from parents/ guardians for transporting children Use recognised commercial transport services where possible Document and share the travel itinerary with parents, guardian and participants including routes, timings, pick-ups, drop-offs etc.

## Safeguarding Risk Inventory

Hazard	Risk	Example Controls
		<p>Ensure at least two adults accompany participants to reduce risk</p> <p>Confirm driver credentials and perform vehicle safety checks</p> <p>Provide emergency contact numbers and GPS tracking where feasible</p>
Failure to adequately manage accommodation arrangements	<p>Person feeling isolated and anxious</p> <p>Privacy intrusions</p> <p>Inappropriate behaviour</p> <p>Increased risk of abuse</p>	<p>Obtain prior written consent from parents/guardians for overnight stays</p> <p>Conduct thorough screening and approval of hosts</p> <p>Prohibit bed sharing</p> <p>Separate sleeping arrangements for different genders</p> <p>Implement a curfew, supervision checks, and emergency contact procedures</p> <p>Establish a confidential reporting mechanism for concerns during overnight stays</p> <p>Provide chaperones or assigned safeguarding officers during overnight stays</p>
Failure to regulate the taking and sharing of images	<p>Unauthorised images taken and shared</p> <p>Inappropriate or degrading images taken and shared</p> <p>Privacy breaches</p> <p>Increased risk of image-based abuse and exploitation</p>	<p>Obtain prior written consent from parents/guardians for photography and media use</p> <p>Clearly notify individuals when images are being taken, including through signage and announcements</p> <p>Prohibit unauthorized image capture and establish guidelines for appropriate media sharing</p>



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Hazard	Risk	Example Controls
Failure to vet and regulate external parties and service providers	<p>Infiltration of unsuitable/unsafe individuals</p> <p>Inappropriate behaviour</p> <p>Increased risk of abuse</p>	<p>Conduct safeguarding due diligence on external parties/providers</p> <p>Obtain evidence of screening checks and accreditations</p> <p>Establish safeguarding agreements with external parties/providers, setting out expectations and responsibilities</p> <p>Monitor and evaluate external parties/providers regularly</p>
Failure to regulate alcohol and illicit drugs	<p>Alcohol or drugs used to disinhibit another person</p> <p>Inappropriate, disruptive, volatile behaviour</p> <p>Excessive alcohol consumption and overdose</p> <p>Increased risk of abuse</p> <p>Legal breaches</p>	<p>Obtain liquor permits where necessary</p> <p>Enforce strict alcohol regulations</p> <p>Enforce responsible service of alcohol</p> <p>Establish designate alcohol-free areas</p> <p>Prohibit drug possession and use, with clear consequences for violations (zero tolerance)</p> <p>Actively monitor and supervise to ensure compliance</p>
Failure to implement and promote reporting pathways	<p>Inability to report safeguarding concerns and abuse incidents/complaints</p> <p>Increased risk of abuse</p> <p>Victims may suffer prolonged abuse</p> <p>Non-compliance with legal reporting obligations</p>	<p>Establish multiple reporting pathways accessible to children, workers, and the community (e.g. in-person, online, STOPline).</p> <p>Train workers on the reporting pathways</p> <p>Inform children about the reporting pathways in an age and capacity appropriate manner</p> <p>Regularly promote reporting pathways (e.g. posters, website, newsletter, social media)</p>