

Child Safety and Cultural Safety Risk Management

Swimable is committed to the safety and well-being of children and young people who are a part of our customer base and community. As a part of our active approach to child safety and cultural safety, we have developed and adopted the following template to contribute to the development and continuous improvement of a child safe culture through active risk management.

Principles and Guidelines

The following table outlines the principal elements of risk management:

Principle	Definition and Consideration
Identify	Identify where, when, why, and how certain types of risks may happen.
Analyse	Determine the likelihood of the risks occurring, how they may occur, and the potential consequences related to these risks.
Evaluate	Comparing the level of risk and the level of adversity in the outcome, so that decisions can be made on prevention and education
Control	Develop and implement action plans and strategies that centre on how to mitigate said risks and manage them if they occur
Monitor and communicate	Monitor the effectiveness of the process put in place for risk management. Regularly review these processes and update if and when necessary. Communicate the risk management plan to all Staff, volunteers, and the parents/guardians of children to educate them on the processes.
Consult	Regularly accept feedback from the Swimable community and review processes to ensure this feedback is being addressed properly within the set framework.

Child Safety and Cultural Safety Risks

Swimable takes child safety and cultural safety risks very seriously. Before developing the strategies to mitigate risks, it is important to highlight the probable risks with reference to child safety and cultural safety.

Risk matrix

Swimable has used the following Risk Matrix to analyse and determine the risk levels of identified risks:

Likelihood	Risk Level				
	Almost certain	Medium	High	High	Extreme
Likely	Medium	Medium	High	Extreme	Extreme
Possible	Low	Medium	High	High	Extreme
Unlikely	Low	Low	Medium	Medium	High
Rare	Low	Low	Medium	Medium	High
Consequence	Insignificant	Minor	Moderate	Major	Catstrophic

Analysis and Evaluation of Risk

The table below identifies the possible risks and the risk level in a swimming environment, the likelihood of it occurring, and the potential consequences:

Type	Cause	Likelihood	Consequence	Risk Level
Leadership	Management is not aware of/ not educated about/ not committed to ensuring a Child Safe organisation	Rare	Organisation not being child-safe - Catastrophic	High
Unsupervised changing rooms	Parents leaving child/ren alone in the changing rooms	Unlikely	Possible sexual abuse - Catastrophic	High
Slipping on a wet deck	Children running/unbalanced on the deck	Likely	Injury - Moderate	High
Recruitment	Employer not following recruitment guidelines	Rare	Inappropriate staff employed - Major	Medium
Privacy	Parents wanting to take videos of their children swimming Staff taking a photo for social media without consent	Possible	Privacy infringement - Major	High
Grooming	Adults interacting inappropriately online or face-to-face with children	Rare	Danger of inappropriate relationships developing outside of the Swimable environment - Major	Medium

Sexual Harassment	Adults interacting inappropriately (asking for sexual favours, explicit jokes, suggestive comments) with (or in the presence) of children	Rare	Possible sexual abuse, psychological and emotional damage. Can cause suicide - Catastrophic	High
Psychological Harassment (Mobbing/Bullying)	Student/parent/teacher or other staff member behaving in a way that mentally distresses another student/parent/teacher or other staff member (eg: isolating, belittling, spreading rumours, making unreasonable demands)	Rare	Psychological and emotional damage. Can cause suicide - Catastrophic	High
Discriminatory Harassment	Ignorance of parents/children/teachers or other staff members and/or targeting someone due to their protected traits with slurs/insults/unfair treatment	Rare	Psychological and emotional damage. Can cause suicide - Catastrophic	High
Physical and verbal harassment	Adults/children making offensive comments, unwanted touches, miscommunication, threats, and aggressive actions	Rare	Psychological and emotional damage and/or injuries. Catastrophic	High
Door jamming people's fingers	Lack of awareness of danger by parents /children	Likely	Injury - Minor	Medium
Insufficient supervision	Lack of attention from the parents	Possible	Injury - Moderate	High
Pool temperature	Pool heater not functioning normally	Possible	Discomfort and potential illness - Insignificant	Low
Jumping/diving off the diving blocks	Lack of supervision/ education	Unlikely	Potential serious injury - Catastrophic	High

Risk management strategies

Risk management comprises developing and implementing action plans that help manage and reduce risks that occur in a workplace. The risk management strategies at Swimable have been created keeping in mind the responsibilities of: Swimable as an organisation, employees of Swimable and

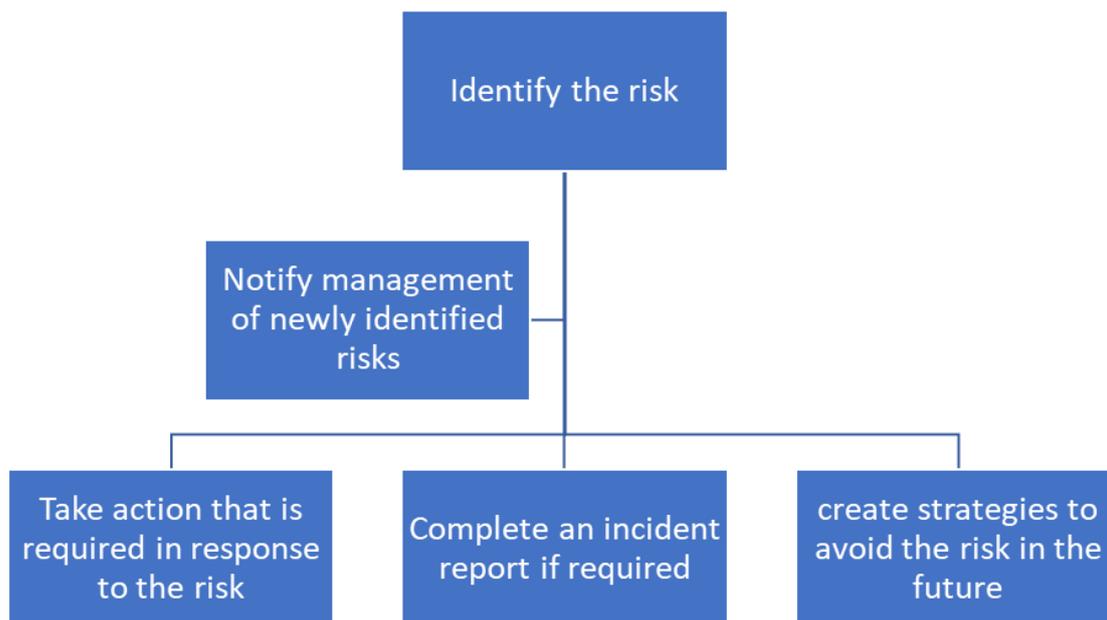
parents/guardians of children associated with Swimable (including the customers who are part of the adult swimming classes).

Type	Swimable	Employees	Customers/parents/guardians
Leadership	<ul style="list-style-type: none"> - Implement the required 11 Child Safe Standards 	<ul style="list-style-type: none"> - Raise any issues identified with Management 	<ul style="list-style-type: none"> - Raise any issues identified with Management
Unsupervised changing rooms	<ul style="list-style-type: none"> - Require parents/guardians to supervise their children at all times - Ensure staff follow the Codes of Conduct 	<ul style="list-style-type: none"> - Per the Staff Handbook, consciously avoid being alone in an area with a child - Comply with Codes of Conduct 	<ul style="list-style-type: none"> - Adequate supervision in the changerooms
Slipping on a wet deck	<ul style="list-style-type: none"> - Signs around the pool warning against running on the deck - Train staff to warn children not to run on the pool deck 	<ul style="list-style-type: none"> - Staff to warn children not to run on the deck when exiting the pool 	<ul style="list-style-type: none"> - Adequate supervision of children on the pool deck
Recruitment	<ul style="list-style-type: none"> - Screening of all employees - Reference checks - Working with children check - Training/probation period 	<ul style="list-style-type: none"> - Report any inappropriate behaviour by another employee to management 	<ul style="list-style-type: none"> - Notify management if there is any employee misconduct
Privacy	<ul style="list-style-type: none"> - Regular notifications sent to customers, parents, and staff not to take any photos or videos of children in the pool - Photo release forms - Staff Code of Conduct 	<ul style="list-style-type: none"> - Inform parents/guardians when they take videos or photos of children that it is a privacy breach and request them to stop - Ensure that any recorded content is deleted immediately. - Staff training on child safety 	<ul style="list-style-type: none"> - Refrain from taking videos or photos of the children in the pool - Notify Swimable deck management of any possible breaches of privacy
Grooming	<ul style="list-style-type: none"> - Codes of Conduct to be signed by all staff members 	<ul style="list-style-type: none"> - Notify management of any breaches of Child Safe Policies and Codes of Conduct 	<ul style="list-style-type: none"> - Alert the organisation of any breach of Child Safety Policy

	<ul style="list-style-type: none"> - Child Safety training for all employees 		
Sexual Harassment	<ul style="list-style-type: none"> - Action taken in accordance with the Swimable Bullying and Harassment Policy 	<ul style="list-style-type: none"> - All employees signing and complying with the Sexual Harassment Policy. - Immediate action by notifying supervisors if a situation has made them feel uncomfortable - Create an environment where the child is comfortable discussing any situation that is making them uncomfortable 	<ul style="list-style-type: none"> - Alert the organisation of any breach of Child Safety Policy - Bringing to management's attention any situation that made their child(ren) feel uncomfortable
Psychological Harassment (Mobbing/Bullying)	<ul style="list-style-type: none"> - Ensure action taken in accordance with the Swimable Bullying and Harassment Policy <p>Staff are aware of the Bullying and Harassment Policy</p>	<ul style="list-style-type: none"> - Staff to sign and comply with the Swimable Code of Conduct. Immediate action by notifying supervisors in case of any bullying incident 	<ul style="list-style-type: none"> - Informing management about any incident and working with management to find a solution
Discriminatory Harassment	<ul style="list-style-type: none"> - Creation of a culturally safe and diverse environment in accordance with the Swimable Child Safety and Cultural Safety Policy 	<ul style="list-style-type: none"> - Create an environment where the child is comfortable with expressing their culture/spiritual norms and beliefs. - Reporting any instance that could be considered discriminatory 	<ul style="list-style-type: none"> - Reporting any potential discriminatory treatment to management - Advise management of any unique requirements (including, but not limited to, cultural/spiritual requirements)
Physical and verbal harassment	<ul style="list-style-type: none"> - Ensure action taken in accordance with the Swimable Bullying and Harassment Policy 	<ul style="list-style-type: none"> - Staff to act in accordance with Swimable's Child Safety and Cultural Safety Policies 	<ul style="list-style-type: none"> - Educating children on how to behave appropriately - Close supervision of children at all times - Notify management of any potential

	<ul style="list-style-type: none"> - Staff are aware of the Bullying and Harassment Policy 		physical/verbal harassment situations
Door jamming people's fingers	<ul style="list-style-type: none"> - Injury reporting - Request St Mary's College to adjust door closure 	<ul style="list-style-type: none"> - Incident reporting and provision of First Aid 	<ul style="list-style-type: none"> - Parental Supervision
Insufficient supervision	<ul style="list-style-type: none"> - Terms and Conditions require parental supervision of children under 10 	<ul style="list-style-type: none"> - On deck staff to notify management and parent if child is unsupervised 	<ul style="list-style-type: none"> - Parents/guardians to supervise children at all times -
Pool temperature	<ul style="list-style-type: none"> - Regularly checking the temperature and working with St Mary's College to resolve any issues 	<ul style="list-style-type: none"> - Notify on-deck staff when water and the surrounding deck temperature feels colder than usual 	<ul style="list-style-type: none"> - Make sure children are immediately dried and dressed after the lesson. - Notify management if the pool environment feels cold.
Jumping/diving off the diving blocks	<ul style="list-style-type: none"> - Ensure all staff are consistently reminding students not to jump off the blocks or dive. - No-diving signs around the pool 	<ul style="list-style-type: none"> - Reminding students not to dive at any time due to shallow depth. Reiterating that jumping from the blocks is dangerous. Pointing to signs so students are aware 	<ul style="list-style-type: none"> - Closely supervising children always. Ensuring they are following the instructions of the teacher - Educating children on the risks of diving in shallow pools

Monitoring and communication of the Risk management plan



Version Details

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