



**Risk Management
and Student Safety Policy**

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4.3.1 Risk Management and Student Safety Policy

Policy Content

Elements	Details
Registration Manager	Australian Skills Quality Authority (ASQA)
Conditions of Registration	VET Quality Framework (VQF)
Standards Referenced	Outcome Standards for NVR RTOs 2025 - Standard 4.3
Legislation / Other Requirements	

Purpose

The purpose of this policy is to establish a proactive and systematic approach to identifying, managing, and reviewing risks that may affect the safety, wellbeing, and success of VET students, staff, and the organisation. It ensures that risks associated with the delivery of training and assessment particularly to students under 18 years of age are appropriately addressed and managed in accordance with the National Principles for Child Safe Organisations and relevant legislative requirements.

Scope

This policy applies to all staff, trainers and assessors, program managers, contractors, and third-party partners involved in the delivery and assessment of nationally recognised training and support services within the Registered Training Organisation (RTO). It is particularly relevant where the RTO provides training or assessment to VET students under the age of 18.

Policy Statement

The RTO is committed to maintaining a safe, supportive, and responsive learning environment for all students and staff. It will identify and manage risks in its operations to protect students' physical and psychological safety, especially for those aged under 18 years. The RTO will:

- Implement a structured risk management framework to assess and control risks.
- Regularly review potential threats to student and staff wellbeing.
- Ensure that the design and delivery of training and assessment does not expose students to harm.
- Address child safety risks by aligning practices with the **National Principles for Child Safe Organisations**, as in force from time to time.
- Monitor the effectiveness of safety measures and take corrective action where necessary.

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4.3.1.1 General Principles for Procedures

The following procedural principles guide the implementation of this policy:

A. Risk Identification and Assessment

- Risks will be identified through ongoing consultation, audits, feedback, incident reporting, and delivery design reviews.
- Special consideration will be given to the risks associated with underage learners in both physical and online environments.

B. Delivery Design Considerations

- Training content and delivery modes will be assessed to ensure age-appropriateness, accessibility, and psychological safety.
- Activities and assessments will be reviewed to eliminate any content or delivery methods that may pose risk to learners' wellbeing.

C. Child Safety Compliance

- The organisation will adopt and implement practices consistent with the **National Principles for Child Safe Organisations**, including cultural safety, child empowerment, staff screening, and child-friendly complaint mechanisms.
- All personnel involved in working with students under 18 will receive child safety training and undergo Working With Children Checks (or equivalent clearance as applicable).

D. Risk Monitoring and Review

- Risk management procedures will be reviewed regularly or following a significant incident, change in operations, or feedback.
- Continuous improvement processes will be used to adjust controls and update training delivery protocols.

E. Responsibilities

- The RTO Manager and designated Compliance Officer are responsible for overseeing implementation and review of risk controls.
- Trainers, assessors, and administrative staff are responsible for reporting concerns and following all student safety protocols.

4.3.1.2 Procedures

4.3.1.2.1 Identifying, Managing, and Reviewing Risks to VET Students, Staff, and the Organisation

This procedure ensures that the RTO systematically identifies, assesses, manages, and reviews risks affecting its core responsibilities under the Standards for RTOs 2025, with a particular focus on:

- Protecting the health, safety, and wellbeing of VET students, especially those aged under 18.
- Supporting safe, fair, and compliant working conditions for trainers, assessors, and RTO staff.
- Safeguarding the RTO's operations, compliance obligations, and training product integrity.

4.3.1.2.1.1 Risk Identification (Across All RTO Operations)

Risk identification is embedded in RTO planning, delivery, assessment, and administration. The Compliance Officer and relevant department heads coordinate this process by:

A) Identifying risks to students:

- Unsafe physical or online learning environments
- Inappropriate, offensive, or distressing content
- Insufficient support mechanisms
- Risks of isolation or disengagement
- Risks of abuse, neglect, or grooming behaviour

B) Identifying risks to staff:

- Workplace health and safety hazards
- Inadequate induction or procedural knowledge
- Emotional and psychological risk
- Exposure to misconduct or aggression

C) Identifying risks to the organisation:

- Non-compliance with the VET Quality Framework
- Failure to meet contractual or funding body requirements
- Poor quality training delivery or invalid assessment tools

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- Technology failures in online systems
- Risks associated with third-party or subcontracted delivery

4.3.1.2.1.2 Risk identification methods include:

Curriculum Reviews

The RTO conducts structured reviews of all training and assessment strategies (TAS), unit content, and session plans to ensure that:

- Learning materials are age-appropriate, inclusive, and free from harmful or discriminatory content.
- Training and assessment tasks align with the unit of competency while also considering student safety and accessibility.
- Modes of delivery (e.g. face-to-face, online, blended) are suitable for the learner cohort, including those under 18.
- Session content does not expose students to unnecessary physical or psychological risk.

Curriculum reviews help detect risks associated with inappropriate delivery methods, unrealistic workloads, or poorly contextualised assessments.

Internal Audits and WHS Inspections

The RTO schedules regular internal audits and workplace health and safety (WHS) inspections to:

- Identify physical hazards in training rooms, workshops, kitchens, computer labs, and assessment spaces.
- Check compliance with WHS policies, safety signage, PPE use, and equipment condition.
- Ensure emergency procedures, evacuation plans, and first aid resources are in place and understood.
- Confirm that delivery environments are secure, clean, and suitable for minors where applicable.

These inspections are especially critical for high-risk delivery areas or when hosting students under 18.

Stakeholder Consultation

The RTO regularly engages with internal and external stakeholders to identify emerging risks or gaps in delivery safety. This may include:

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- Trainers and assessors – who can report student behaviour, delivery issues, or resource needs.
- Students and parents/guardians – who may provide feedback about wellbeing, supervision, or content sensitivity.
- Industry representatives – who can advise on safe practices during simulated or work-based training.
- Support services – who may flag learners at risk due to health, mental wellbeing, or disability considerations.

Consultation ensures a well-rounded risk profile is developed based on lived experience and operational context.

Review of Complaints, Incidents, and Trainer Reports

The RTO analyses past and current records of:

- Complaints from students or parents about delivery, content, environment, or staff conduct.
- Reported incidents, injuries, or behavioural issues that occurred during training or assessment.
- Internal reports submitted by trainers and assessors regarding misconduct, hazards, or policy breaches.

This review helps identify trends or recurring issues that may point to systemic risks in training practices or supervision gaps.

Monitoring of Delivery and Assessment Practices

Delivery and assessment activities are continuously monitored through:

- Direct observation by coordinators or compliance staff
- Validation sessions and assessment moderation
- Learner engagement monitoring (e.g. attendance, participation, completion rates)
- Real-time tracking of online sessions, breakout rooms, and digital platform activity

Monitoring helps ensure that the delivery remains compliant with the TAS, unit requirements, and student support expectations. It also helps detect early warning signs of disengagement or emerging safety concerns.

4.3.1.2.1.3 Risk Assessment and Prioritisation

Each risk is assessed using the RTO's approved Risk Matrix, which classifies the level of exposure based on:

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- Likelihood
- Consequence
- Overall Risk Rating

Structured assessment allows the RTO to:

- Allocate appropriate resources to high-risk areas
- Apply protective strategies for underage students and vulnerable cohorts
- Ensure risk controls are relevant to the training environment

Each risk is formally recorded in the RTO Risk Register, noting:

- Nature of the risk
- Affected parties or processes
- Risk rating and rationale
- Assigned responsible officer or team
- Control actions and review schedule

The Risk Register is maintained as an official audit document and linked to the Continuous Improvement Register.

4.3.1.2.1.4 Risk Control and Implementation

Risk controls are selected based on their effectiveness in eliminating or minimising identified risks, and are applied according to their **relevance to the training product, learner group, and delivery setting**. The RTO applies the recognised **hierarchy of control**, in descending order of effectiveness:

Elimination

- This involves **completely removing the source of the risk** so that exposure is no longer possible.

Substitution

- This involves **replacing the hazard or risk source** with something less harmful or more suitable for the learner group.

Engineering Controls

- These are **physical or structural modifications** made to the learning environment to isolate students and staff from risks.

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Administrative Controls

- These involve **implementing policies, procedures, rosters, training, and behavioural guidance** to reduce risk exposure.

PPE and Behavioural Protocols

- This control includes providing and enforcing the use of **personal protective equipment (PPE)** and applying **codes of conduct** to reduce the likelihood of injury or inappropriate behaviour.

These control measures are documented in the Risk Register, Training and Assessment Strategy (TAS), and session plans. Their implementation is monitored regularly and updated through internal audits and continuous improvement processes.

For learners under 18, risk controls must be in line with the National Principles for Child Safe Organisations and include:

- Safe recruitment and screening
- Age-appropriate learning content and strategies
- Active supervision in all learning environments
- Clear procedures to detect and report risks
- Accessible and confidential complaint processes

All implemented controls must be documented and reflected in the following:

- Training and Assessment Strategy (TAS)
- Session plans
- Staff induction and procedural materials
- Third-party service agreements

4.3.1.2.1.5 Ongoing Monitoring and Review

Risk management is a continuous process embedded in day-to-day operations, training delivery, and compliance practices. The RTO must:

- Monitor the effectiveness of risk controls during regular operational activities.
- Conduct scheduled reviews of all recorded risks in line with assigned review timelines.
- Respond promptly to any emerging risks, incidents, or feedback that indicate changes in exposure or effectiveness of current controls.
- Reassess risks following significant events, such as:

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- Incident reports
- Delivery method changes
- Introduction of new training products
- Legislative or regulatory updates
- Document all review outcomes and adjustments in the Continuous Improvement Register.

4.3.1.2.1.6 Roles and Responsibilities

Role	Responsibilities
RTO Manager	Approves and oversees the implementation of risk management strategies.
Compliance Officer	Maintains the risk register, coordinates audits, and leads scheduled risk reviews.
Trainers/Assessors	Identify, report, and help manage risks during delivery and assessment.
Administration Staff	Support documentation, incident reporting, and implementation of risk controls.
Third Parties	Comply with the RTO's risk management policies as part of contractual arrangements.

4.3.1.2.2 Managing Risks and Safety Obligations for Under-18 VET Students

This procedure outlines how the RTO identifies, manages, and monitors risks associated with providing training and assessment to **VET students under the age of 18**. These students are legally recognised as minors and may require additional safeguards. This procedure ensures their safety and wellbeing are protected within the RTO's training and assessment environment, support systems, staffing structures, and operational procedures.

The RTO is responsible for:

- Ensuring the training environment is physically and emotionally safe for students under 18.
- Ensuring training content and delivery methods are appropriate to their age and stage of development.
- Preventing exposure to risks arising from insufficient supervision, unsuitable delivery platforms, or inappropriate material.
- Meeting ethical, professional, and legal obligations under national child safety guidelines and applicable laws.

This procedure applies to all delivery modes, including face-to-face, blended, online, third-party, and work-based learning.

This procedure applies to:

- All staff, trainers, assessors, administrative teams, and contractors involved in training or supporting underage learners.
- All environments in which nationally recognised training or assessment is delivered.
- All enrolled or prospective **VET students aged under 18 years**, including those in schools, school-based apprenticeships, or direct enrolment.

It also applies to any **third-party arrangements** or **work placement hosts** who may engage with underage students through RTO-facilitated training.

4.3.1.2.2.1 Risk Identification Specific to Under-18 Learners

The RTO acknowledges that underage learners may face additional risks when participating in adult learning environments. Risk identification for this group must be deliberate, proactive, and integrated into planning and delivery.

The RTO must assess the following areas before and during delivery:

a) Training Content Suitability

- Ensure content is appropriate for a minor's maturity level.
- Avoid topics that are graphic, confronting, discriminatory, or otherwise unsuitable for minors unless mandated by the training product and delivered with protective framing.
- Modify or contextualise delivery strategies where sensitive themes are embedded in the unit.

b) Delivery Mode Appropriateness

- Ensure supervision is continuous and adequate, regardless of whether learning is online, blended, or in person.
- Prevent underage students from unsupervised interaction in group activities, breakout sessions, or work placements.
- Confirm that the delivery platform or environment supports safety features (e.g. privacy, access controls, filtered communications).

c) Trainer Preparedness and Staff Conduct

- Confirm all trainers and staff in contact with underage learners hold a current **Working With Children Check** (or equivalent).

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- Ensure staff are trained in child safety awareness and understand their reporting obligations.
- Reinforce conduct standards and boundaries in trainer–student interactions.

d) Physical and Digital Learning Environments

- Inspect physical learning spaces for potential hazards (e.g. access, equipment, visibility).
- Review digital platforms for chat moderation, access limitations, and record-keeping of interactions.
- Limit external access to sessions where underage learners are present.

e) Individual Risk Factors

- Engage with learners and, where appropriate, parents/guardians to identify specific support or supervision needs.
- Consider cultural, linguistic, or disability factors that may influence risk.

All identified risks must be recorded in the RTO’s risk register with accompanying control strategies.

4.3.1.2.2 Alignment with the National Principles for Child Safe Organisations

The RTO must manage risks to underage learners by **adopting and applying** the **National Principles for Child Safe Organisations**, as in force from time to time. These principles establish a national benchmark for child safety and wellbeing across all sectors.

The RTO is required to:

- **Embed child safety into governance, leadership, and culture**, ensuring accountability at all levels of the organisation.
- **Empower students to participate in decisions that affect them**, including involvement in feedback, evaluations, or concerns.
- **Engage families and communities** by providing access to key safety information and complaint procedures.
- **Ensure equity and cultural safety** for all learners, particularly Aboriginal and Torres Strait Islander students, students from diverse backgrounds, and students with additional needs.
- **Recruit safely and ensure ongoing suitability of staff**, including background checks, screening, and mandatory training.

- **Establish accessible complaint and incident procedures** that are age-appropriate and non-intimidating for minors.
- **Ongoing education and capacity building**, including regular staff refreshers and process reviews to address emerging risks.

4.3.1.2.2.3 Delivery Safeguards and Supervision Controls

The RTO must implement delivery safeguards to maintain a secure and supportive environment for underage learners. These safeguards must be embedded in session planning, trainer induction, and operational procedures across all training modes.

The following controls are mandatory:

- **Supervision:** Underage learners must be continuously supervised during training and assessment sessions, whether conducted face-to-face, online, or off-site. Unsupervised interaction between underage learners and adults is not permitted.
- **Access Control:** Training environments, both digital and physical, must restrict unauthorised access. This includes secure online platforms and monitored physical spaces.
- **Communication Boundaries:** Staff must maintain professional boundaries when interacting with underage learners. Direct communication outside of official training channels must be discouraged and reported if it occurs.
- **Session Design:** Delivery content, tasks, and materials must be age-appropriate and inclusive. Where units involve sensitive or advanced subject matter, learning strategies must be adjusted to protect learner wellbeing.
- **Work Placement:** If a unit requires work placement or external observation, all participating host sites must agree to supervision and safety conditions appropriate to minors. The RTO must provide placement induction and clearly define supervisory roles.
- **Training for Staff:** All trainers, assessors, and relevant support staff must complete periodic training in child protection and student safety as part of their ongoing professional development.

4.3.1.2.2.4 Incident Reporting and Mandatory Notification

Any concerns or incidents affecting the safety or wellbeing of an underage learner must be treated as a priority and handled in accordance with legal and organisational requirements.

The RTO must:

- **Immediately escalate safety concerns** involving suspected harm, abuse, grooming, or neglect to the RTO Manager or designated Child Safety Officer.

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- **Activate mandatory reporting** where required under state or territory child protection legislation. Staff are not to delay reporting if a student is at risk.
- **Record the incident** in the RTO’s incident reporting system, including relevant dates, parties involved, actions taken, and any follow-up requirements.
- **Ensure confidentiality** of all involved parties, while ensuring appropriate disclosures are made to statutory authorities as required.
- **Support affected students**, offering referral to counselling or wellbeing support services as needed.

4.3.1.2.2.5 Legislative Compliance and Application of Section 191A

The RTO confirms that in accordance with **Section 191A of the National Vocational Education and Training Regulator Act 2011**, this procedure:

- **Applies and adopts the National Principles for Child Safe Organisations**, as in force from time to time, as a regulatory requirement for the delivery of training to underage learners.
- Commits to regularly reviewing and updating delivery practices to ensure alignment with the current version of the National Principles as issued by the Australian Human Rights Commission or its nominated authority.
- Recognises that these principles, although external to the Standards for RTOs 2025, form part of the RTO’s compliance obligations by incorporation through this procedure.

Roles and Responsibilities

Role	Responsibilities
RTO Manager	Ensures child safety governance is implemented and monitors risk management processes.
Compliance Officer	Maintains policies and procedures aligned to child safety and monitors implementation.
Child Safety Officer (if appointed)	Acts as first point of contact for child safety concerns, reporting, and referrals.
Trainers/Assessors	Ensure age-appropriate delivery, maintain supervision, and report concerns immediately.
Support Staff	Assist with learner engagement, wellbeing, and liaison with parents or guardians if needed.

Third Parties	Comply with all child safety controls and contractual safety obligations when hosting or delivering to underage students.
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Continuous Improvement

The RTO maintains a structured approach to continuous improvement in its risk management and student safety practices. Feedback, audit findings, and incident data are used to enhance systems and protect student and staff wellbeing.

Improvement inputs include:

- **Feedback from students, guardians, and staff** – collected through surveys, informal feedback, or post-delivery reviews.
- **Internal audits and validations** – used to assess the effectiveness of risk controls and staff compliance with safety procedures.
- **Incident and complaint outcomes** – used to identify recurring issues and implement preventive measures.
- **Industry consultation** – used to ensure practices reflect current standards for working with underage learners and delivering safe training.
- **Regulatory updates** – monitored and applied to update procedures as legislation or standards change.

All improvement actions are documented in the **Continuous Improvement Register**, and outcomes are used to update:

- Training and assessment strategies
- Staff development programs
- Session plans and learner resources
- Risk registers and control procedures

Privacy and Confidentiality

The RTO is committed to protecting the personal information and safety-related records of all students and staff, especially those under 18. All information related to safety risks, disclosures, incidents, or wellbeing is handled in accordance with the **Privacy Act 1988 (Cth)** and relevant state legislation.

Key privacy principles include:

- **Secure collection, use, and storage of information**
- **Access restricted to authorised personnel only**
- **Use of information solely for the purpose for which it was collected**
- **Clear procedures for correction or removal of personal information when required**

Staff handling personal or safety-related information are trained in privacy protocols and are expected to always maintain strict confidentiality.

Retention of Records

All records associated with risk management and student safety are retained according to the RTO's Records Management Policy and legislative obligations.

Retention requirements include:

- **Minimum of five (5) years**, or longer if required under funding agreements or legal proceedings.
- **Secure storage** in digital systems or locked physical archives with controlled access.
- **Version control and access logs** maintained for audit-readiness.
- **Proper disposal** of records that have met their retention period, in accordance with privacy and archival regulations.

Types of records retained include:

- Risk assessments and risk register entries
- Staff screening documentation (e.g. Working With Children Checks)
- Incident and complaint reports
- Learner support records and wellbeing documentation
- Records of improvements made to delivery and safety procedures

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Review Process

This policy and its associated procedures are reviewed regularly to ensure alignment with current legislation, training standards, and operational needs.

Aspect	Detail
Review Frequency	Annually, or sooner if changes occur to legislation, standards, or risks.
Responsible Officer	RTO Manager or Compliance Officer
Review Actions	Consultation with staff, risk register analysis, audit feedback review
Communication of Updates	Changes are recorded, version-controlled, and communicated to all relevant staff.
Record of Review	Documented in the Policy Register and Continuous Improvement Register