



Managing Student Safety



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Auditor-General

Managing Student Safety

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The Hon. Bruce Atkinson MLC
President
Legislative Council
Parliament House
Melbourne

The Hon. Ken Smith MP
Speaker
Legislative Assembly
Parliament House
Melbourne

Dear Presiding Officers

Under the provisions of section 16AB of the *Audit Act 1994*, I transmit my performance report on *Managing Student Safety*.

Yours faithfully



D D R PEARSON
Auditor-General

4 May 2011

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Audit summary

The Department of Education and Early Childhood Development (DEECD) is responsible for providing a safe, secure and stimulating learning environment for about 530 000 students at 1 559 government schools. The responsibility is managed by DEECD's central and regional offices and individual schools.

Legislation, standards and policies detail student safety requirements for government schools. The *Education and Training Reform Act 2006* and associated regulations require all schools to meet minimum safety standards. The *Occupational Health and Safety Act 2004* requires schools to provide healthy and safe work environments and to protect students to the highest level against risks to their health and safety.

Any safety incident involving or injuring a student is undesirable and the impacts of assaults, accidents, bullying, etc., on an individual and their family can be traumatic. From this perspective, no incident can be considered 'acceptable'. However, with a student population of over 530 000, it is inevitable that some students will be injured or involved in undesirable incidents. On average there are about 14 student safety incidents a day and about 167 students are injured in school a day across 1 559 schools.

To know whether students are safe, DEECD needs to understand not only where, why, and what incidents and injuries are occurring, but also set acceptable numbers and degrees of severity for incidents and injuries.

The audit examined whether DEECD had provided students in government schools with a safe environment where the risk of harm is minimised and students feel physically and emotionally secure. In particular the audit examined whether the severity and frequency of safety incidents is in line with DEECD expectations, whether schools could demonstrate they were appropriately managing risks and whether DEECD was offering appropriate guidance and support.

To determine how safe students are in schools the audit examined data on student safety incidents; injuries to students; student opinions; and injury and accident claims.

Conclusion

The continuing low incidence of both safety incidents over the three-year period to 2009, and injuries to students over a six-year period to 2009 indicates that, overall, students are safe in schools. This is supported by students self reporting over this period that they feel safe.

There are positive trends in the number of injuries to students and the most serious types of safety incidents, such as sexual assault, which are falling. However, it is concerning that the total number of safety incidents are increasing as are playground injuries.

It is also concerning that DEECD is not well placed to determine if there are school level or systemic issues that need to be addressed. This is because DEECD does not undertake appropriate quality checking of the safety data, and has not established benchmarks or standards against which to judge the significance of trends in safety events.

At the school level, principals need more support with applying DEECD's safety policies. They are particularly concerned about their ability to deal effectively with traffic safety and the emerging cybersafety threat.

Findings

Severity and frequency of student safety incidents

Safety data reported by schools shows that at 3 077 in 2009, or one incident for every 172 students, the number of incidents is low and has remained so.

The most serious student safety incidents, such as alleged assault and sexual assault, have fallen by 26 per cent—one incident a day in 2009 from 1.3 a day in 2007. However, potentially less serious student safety incidents such as harassment and slips, trips and falls have risen by 45 per cent—13.3 incidents a day in 2009 from 9.2 a day in 2007.

Rates of students injured at school are low and have fallen by 34 per cent over the six-year period to 2009, with most injuries being relatively minor and needing only first aid treatment. The number of students claiming compensation from DEECD for injuries or accidents at school has also fallen significantly.

Students injured at school and on school activities can seek compensation from DEECD. Students made 50 per cent fewer claims for personal injury or accident in 2009 compared with 2000. Over the five years to 2009, of the 339 claims against DEECD, 104 were successful with an average payout of \$45 700. While this also points to there being fewer injuries in government schools, it may also reflect the effect of amendments to the *Wrongs Act 1958* which raised the baseline for the severity of injury for which a claim could be made.

Student perceptions of their safety at school

Most students believe that they are safe from harm in school. Across five separate indicators, with a score of five being the most positive, student responses averaged above four out of five. Student safety scores for all indicators in 2009 were also more positive about the safety of their school than student scores from 2006.

Monitoring school performance

The effectiveness of DEECD's monitoring of student safety is limited by its lack of both quality assurance over safety data, and the rigour over school self-assessments of their compliance with safety requirements. DEECD has also not established its expectations in terms of benchmarks or standards to analyse safety data.

Quality assurance

DEECD's main systems for recording and reporting student safety data are the Incident Reporting Information System (IRIS) for student safety incidents and CASES21 for injury and accident data.

The data collection systems and processes overlap and DEECD exercises only limited control over the completeness and accuracy of the data entered by schools. For example, IRIS data shows that 430 schools reported no incidents in 2009. Similarly, 247 schools recorded no student injuries on CASES21 in 2009. DEECD had not verified either of these results.

Some information is duplicated across the two systems causing confusion for principals about what to report where. For example, student injuries that require treatment by a medical professional must be recorded on CASES21 and reported to DEECD's Emergency Management and Security Unit to be recorded on IRIS. In 2009, more injuries of this type were recorded on CASES21 (3 879) than the total incidents on IRIS (3 077). Such duplication and the lack of quality assurance by DEECD raise doubts about the completeness and accuracy of reporting.

School self-assessments

Schools fill in the DEECD School Compliance Checklist (SCC) to self assess that they meet the minimum student safety standards for registration. However, DEECD has no rigorous assurance about the reliability of the self-assessments. This limits how it can use the SCC to focus resources and guidance to improve school performance.

Benchmarks or standards

DEECD also has not defined an acceptable number or frequency of safety incidents based on nature and severity. As a result it has no reference point or standard to calibrate:

- how well schools manage student safety risks and their risk exposure
- trends in safety incidents to inform decisions about when to intervene and when to assess the effectiveness of programs and strategies
- how to continuously improve safety and what that looks like.

How schools manage student safety

School principals are directly responsible for managing student safety in their school including managing risks such as student behaviour, traffic management and cybersafety, and complying with occupational health and safety requirements.

DEECD supports schools with policies and guidelines based on, and referenced to, legislative and industry safety standards. These are supported by the *Victorian Government Schools Reference Guide* which comprehensively addresses student safety. DEECD regularly reviews and updates key student safety policies and guidelines.

Sixty-five per cent of principals said they felt well supported by DEECD in managing student safety, 28 per cent said that support was poor and 7 per cent very poor.

Risk management

On the whole school principals said they manage risk in line with DEECD policies and guidelines although there were gaps in principals' understanding of risk management and how to manage student safety.

DEECD guides and trains new principals on risk management but the training is not well structured and does not extend to how to identify and manage risks. Eighty-five per cent of principals said they would benefit from further risk management training, while over 90 per cent thought their staff would also benefit.

While most principals felt comfortable identifying risks and deciding what to do about known risks, fewer felt that their reviews of how they manage risk were adequate. More than a third of principals said they did not regularly monitor and improve school safety processes, which shows a lack of systematic review by principals.

Managing major safety risks

DEECD and schools see traffic safety as a significant risk. However, principals are limited in what they can do to improve traffic safety. They expressed frustration with processes that involve third party agencies such as the Department of Transport and local councils, and believed that DEECD's regional offices could do more to support them.

Three-quarters of principals surveyed identified cybersafety, including cyberbullying, as an emerging or increasing risk. DEECD provides extensive, regularly updated information on cybersafety, but has not clearly defined a preferred approach for dealing with cyberbullying.

Principals have tried to engage students and their parents on the issue, but they have found it difficult to engage parents. Schools have made little use of their websites to engage parents in cybersafety and while DEECD's website contains extensive information it is not easy to find and the volume can be overwhelming.

DEECD has up-to-date, detailed guidance on best practice in behaviour management and requires every school to have a student engagement policy in line with it.

At the time of the audit, DEECD had assessed the quality and appropriateness of student engagement policies for over 60 per cent of its schools. It found that 81 per cent fully complied, 18 per cent partially complied and 1 per cent did not comply. DEECD is working with schools to address the non-compliance.

During 2009, DEECD released a new Occupational Health and Safety (OHS) management system to standardise practice and improve workplace safety, including in schools. At the time of the audit regional experts had visited about 1 000 schools to introduce and explain the new system. All schools are expected to have the system by June 2011, after which regional experts will revisit them over the next seven years for a review.

At December 2010, only 60 per cent of principals had assessed their schools against DEECD OHS risk management requirements. Of the 932 principals that completed the assessment, only 60 per cent assessed their school as fully compliant.

Recommendations

Number	Recommendation	Page
	The Department of Education and Early Childhood Development should:	
1.	identify the practical training needs of principals and staff in risk management standards, methods and practices, and provide that training	28
2.	continue to develop its understanding of cybersafety issues in schools, disseminate clear guidance for schools on the best approach to dealing with cybersafety, and support it with training	28
3.	promptly follow-up the reasons for school non-compliance with School Compliance Checklist requirements and redress	28
4.	assure the reliability of school safety data by: <ul style="list-style-type: none"> improving data consistency by clarifying what needs to be reported, when, where and why minimising duplication across the IRIS and CASES21 systems to improve the quality of the data, the efficiency of recording and reporting, and to reduce administration for principals and staff 	35
5.	regularly monitor and analyse data to make best use of the information from schools	35
6.	establish incident and injury targets and benchmarks to enable assessment of school performance	35
7.	develop its Schools Compliance Checklist verification program to include a full and detailed audit program, and implement that program.	35

Submissions and comments received

In addition to progressive engagement during the course of the audit, in accordance with section 16(3) of the *Audit Act 1994* a copy of this report was provided to the Department of Education and Early Childhood Development with a request for submissions or comments.

Agency views have been considered in reaching our audit conclusions and are represented to the extent relevant and warranted in preparing this report. Their full section 16(3) submissions and comments however, are included in Appendix A.

1 Background

1.1 Introduction

The community, and parents in particular, are vitally concerned about the safety of children at school. They want to know that government schools are safe, minimise the risk of harm, and that children feel physically and emotionally safe while in school or doing school activities.

The Department of Education and Early Childhood Development (DEECD) is responsible for providing a safe, secure and stimulating learning environment for about 530 000 students at 1 559 government schools. The responsibility is shared between DEECD's central and regional offices and individual schools.

DEECD has a risk-management framework that describes the schools' responsibilities for identifying and managing risks. School principals are responsible for the day-to-day management of student safety risks. All teachers have a duty of care not only to protect students from known risks, but also to protect them from risks that they could have reasonably foreseen and prevented.

Most risks to student safety fall into three themes:

- **health and wellbeing**—including bullying, harassment, discrimination or a threat or act of violence
- **physical environment**—including playgrounds and buildings, traffic, and extreme weather
- **curriculum**—related to sports, science and technical activities.

1.2 Legislation, regulations and standards

The *Education and Training Reform Act 2006*, and associated regulations, requires all schools to meet minimum safety standards. Schools 'must ensure that the care, safety and welfare of students is in accordance with any applicable state and Commonwealth laws and that staff are advised of their obligations under those laws'.

Figure 1A lists the major standards, policies and laws that detail student safety requirements for government schools.

Figure 1A
Student safety – major standards, policies and laws

Standard/Policy	Description
School registration minimum standards and other requirements	Regulation and compliance requirements, two of which are about the mental and physical safety of students in schools: <ul style="list-style-type: none"> • Student welfare—schools must make sure that the care, safety and welfare of students complies with relevant state and Commonwealth laws, and that staff know their obligations. • School infrastructure—buildings, facilities and grounds must comply with relevant laws such as local, building, planning, and occupational health and safety (OHS) laws.
<i>Occupational Health and Safety Act 2004</i>	This applies to students as ‘other persons at work’ and says: <ul style="list-style-type: none"> • employees, other persons at work and the general public should have the highest level of protection against risks to their health and safety • employers should be proactive and take all reasonably practicable measures to provide healthy and safe work environments.
<i>Accountability and Improvement Framework for Victorian Government Schools</i>	Establishes a process for the continuous improvement of schools. The framework identifies key processes and accountabilities for improving school performance through self-evaluation, review, planning and reporting.
<i>Victorian Government Risk Management Framework</i>	Government departments must manage risk in line with the international standard AS/NZS ISO 31000:2009. They should include internal controls so the executive understands, manages and controls risks and annually verifies the adequacy of the risk management framework, policy, plans and processes.
<i>DEECD Risk Management Framework</i>	All staff are responsible for managing risk and principals must: <ul style="list-style-type: none"> • understand, manage, monitor and treat strategic and operational risks • set and maintain a risk management culture and climate.
<i>Effective Schools are Engaging Schools: Student Engagement Policy Guidelines</i>	Requires schools to develop a Student Engagement Policy and guides them on what to address. <i>Building Respectful and Safe Schools</i> and <i>Ministerial Order 184, Procedures for Suspension and Expulsion</i> support it.
<i>Building Respectful and Safe Schools</i>	Updates and replaces the government's anti-bullying policy <i>Safe Schools are Effective Schools</i> . It gives practical guidance on promoting and keeping a safe and respectful learning environment.
<i>Protecting the Safety and Wellbeing of Children and Young People – Mandatory Reporting Protocol</i>	A joint protocol between the Department of Human Services' Child Protection Unit, DEECD, the Catholic Education Commission of Victoria and Independent Schools Victoria. It defines the roles and responsibilities of education providers to protect children and young people from abuse and neglect. It advises licensed children's services and schools on action when it is thought a child has been harmed or is likely to be harmed by abuse or neglect.

Source: Victorian Auditor-General's Office.

Schools can also use the *Victorian Government Schools Reference Guide* from DEECD. The guide outlines legislation and regulations and lists policies, guidelines and other information to help govern, manage, administer and run schools. It contains almost 1 000 pages of information on DEECD's website, with links to even more detail.

1.3 Roles and responsibilities

1.3.1 School registration

The Victorian Registration and Qualifications Authority (VRQA) is responsible for registering and monitoring schools under the *Education and Training Reform Act 2006*. In line with the *Ministerial Statement of Expectations for the VRQA*, it has set minimum standards for new schools wanting to register, and established schools to continue their registration.

VRQA and the Office for Government School Education (OGSE) in DEECD signed a revised memorandum of understanding (MoU) in 2010. This required OGSE to report government schools' compliance with the minimum standards to the VRQA annually.

The criteria for assessing government school compliance, relating to each minimum standard, are contained within the MoU. The reporting requirements were agreed by the VRQA and OGSE and specifically relate to government schools.

OGSE applies for all new or amalgamated government schools to register, and to schools opening additional campuses, relocating or offering additional year levels.

1.3.2 Risk management and occupational health and safety

Under the DEECD *Risk Management Framework* the OGSE is to regulate how schools manage risks, and to monitor their compliance with the minimum standards.

DEECD's Employee Health Unit has policies and guidelines to help schools manage their responsibilities under the *Occupational Health and Safety Act 2004*. It is setting up an OHS management system for all schools. School principals are responsible for OHS in their schools and must verify to DEECD that they have appropriate OHS systems.

1.3.3 Accountability and improvement

DEECD's central and regional offices and schools are collectively responsible for improving student safety outcomes:

- Central office is accountable to government and the community for the performance of the system and for the appropriate policies and frameworks to support sustained improvement in schools.
- Regional offices are responsible for overseeing the performance of their schools, resource distribution and support.
- Schools are responsible for student achievement, equity, education, and for the health and sustainability of their school. School principals are directly responsible for student safety and need to understand, manage, monitor and treat strategic and operational risks.

DEECD's *School Accountability and Improvement Framework* and *Network Accountability and Improvement Framework* outline the key processes and accountabilities for schools and regions to improve student outcomes.

1.3.4 Managing specific risks

DEECD has detailed policies, guidelines and systems for schools to manage risks such as cybersafety, school camps and serious incidents that may involve the police and/or health services. These include its E-learning website, the *Victorian Government Schools Reference Guide*, training for staff in treating severe shock and an OHS management system. DEECD has also set up an Emergency and Security Management Unit which helps schools deal with those critical incidents such as assaults, accidents or deaths that are reported to the unit.

Schools are required to record accidents and injuries at school or on excursions in their injury management system, and to report all serious and critical incidents to DEECD's central office.

1.4 Audit objectives and scope

The audit examined whether DEECD had provided students in government schools with a safe environment where the risk of harm is minimised and students feel physically and emotionally secure.

Specifically the audit assessed whether:

- DEECD had developed and implemented appropriate strategies to support and guide schools in identifying, managing and reporting risks to student safety
- schools were demonstrating appropriate management of risks to student safety
- the severity and frequency of safety incidents across the school sector is in line with DEECD's expectations.

The audit reviewed the guidance and support for schools from DEECD's central office. It considered not just security of the school and its grounds but also emerging risks such as cyberbullying, assault and unauthorised access to school premises.

The audit sampled schools of different types, sizes and locations and examined student safety incident data from DEECD and individual schools. It also reviewed the safety factor answers in the student Attitudes to School Survey.

1.5 Audit cost

The audit was performed in accordance with Australian Auditing and Assurance Standards and cost \$450 000.

1.6 Structure of this report

This report is structured in the following way:

- Part 2 examines safety incidents involving students.
 - Part 3 examines managing student safety in schools.
 - Part 4 examines monitoring school performance.
-

2 Safety incidents involving students

At a glance

Background

Data describing incidents at school is one indicator of how safe students are and students are also surveyed to find out how safe they feel at school. The audit examined Department of Education and Early Childhood Development (DEECD) data to find the number of incidents, their ratio to the student population, and if there were any trends.

Conclusion

The available data indicates that DEECD has created a safe environment for students at school. Although the number of student safety incidents and serious injuries have risen, they remain low as a proportion of the student population.

Findings

- The number of alleged criminal incidents reported, such as assault and sexual assault, has fallen over the three years to 2009, but non-criminal incidents such as non-criminal assault, unwanted behaviour of a sexual nature and physical threats have risen over the same time.
- The number of injuries has fallen for the six years to 2009, and is low relative to the student population.
- Attempted suicides have risen by 38 per cent in the three-year period to 2009.
- Students surveyed in 2009 said they felt safer in school than students surveyed in 2006, and primary school student results showed they generally felt safer than secondary school students.

2.1 Introduction

The Department of Education and Early Childhood Development (DEECD) gathers data about student safety in schools. When analysed over time, the frequency and severity of incidents and injuries can indicate trends in student safety. The audit examined data covering:

- critical incidents comprising alleged criminal activity, unwanted activity and traffic incidents
- students needing first aid or hospital treatment
- student opinions on how safe they feel at school
- injury and accident claims made by students.

This chapter presents the results of data analysis and provides information on the overall trends and specific types of incidents and injuries.

2.2 Conclusion

The available data indicates that the DEECD has created a safe environment for students at school and this is supported by positive student perceptions of feeling safe at school.

The number of student safety incidents and the number of injuries to students, as proportions of the student population, have remained low for three and six years respectively. However, there are some confounding variables. The overall number of student safety incidents is increasing and trending upwards, as is the severity of injuries to students. There is also a far greater chance of students being injured by slipping or tripping than any other type of safety incident and the school playground is the most likely place for this to happen.

2.3 Student safety incidents

2.3.1 Background

DEECD's emergency and critical incident management guidelines state that where the safety of students is at risk, schools must immediately report the incident to DEECD's Emergency and Security Management Unit (ESMU). ESMU records these incidents in the Incident Reporting Information System (IRIS), used by DEECD's central and regional office staff to assist schools to manage incidents. Student safety incidents are categorised into:

- **alleged criminal activity**—activities serious enough to warrant reporting to police including assault, sexual assault, drug related incidents and deaths
- **unwanted activity**—undesirable and disruptive activities that do not require police involvement including abusive behaviour, assault (minor), bullying, unwanted behaviour of a sexual nature and physical threats

- **occurrences**—incidents not necessarily related to any criminal or unwanted activity including falls, trips and slips, students being hit by a moving object (e.g. ball), suicide or attempted suicide, and vehicle-related incidents.

We have reported student safety incident data on a calendar year basis.

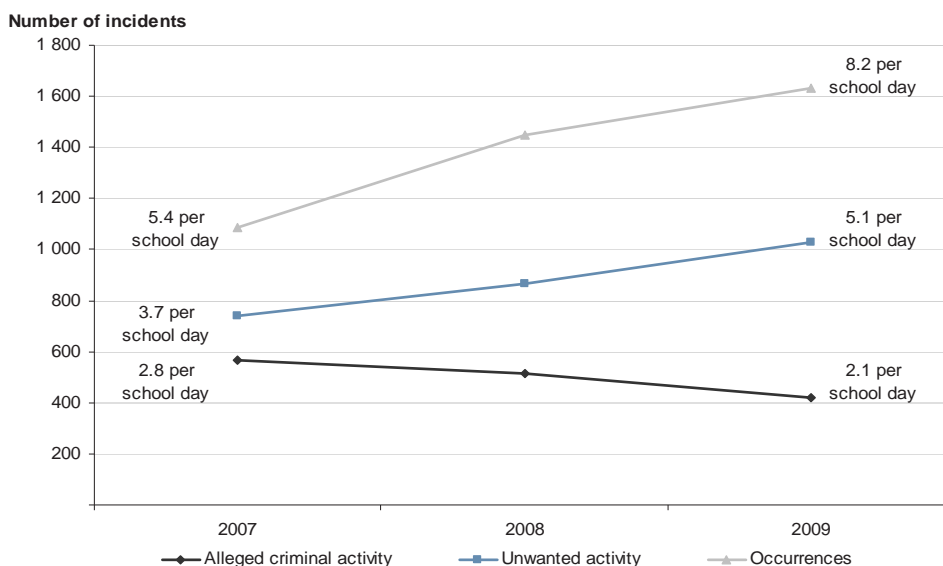
2.3.2 Overall trend

Overall, student safety incidents have risen between 2007 and 2009, and although the numbers are low relative to the student population, the trend reflects negatively on student safety. Over the same period the student population has remained largely the same.

2.3.3 Analysis by type of incident

DEECD recorded 3 077 student safety incidents in 2009 compared to 2 397 in 2007, an increase of 680, or 28 per cent. Based on 200 school days per year, the average number of incidents per day increased to 15.4 in 2009 from 12.0 in 2007. Figure 2A shows the number and trend in incidents recorded in the three main student safety incident categories.

Figure 2A
Student safety, 2007–2009 calendar years



Source: Victorian Auditor-General's Office analysis of Department of Education and Early Childhood Development data.

Criminal activity

Alleged criminal activities, the most serious category of student safety incidents, fell by 26 per cent between 2007 and 2009. They also fell as a proportion of all incidents to 14 per cent in 2009, compared to 24 per cent in 2007.

Alleged incidents of criminal assault involving a student fell 26 per cent to 191 between 2007 and 2009. Student injury and accident compensation claims support this, showing a steady fall in fight and assault based claims between 2001 and 2009. In 2009 injury and accident claims for fights and assaults accounted for 8 per cent of all claims compared to 17 per cent in 2001. The number of alleged sexual assaults involving a student also fell to 190 in 2009 from 271 in 2007—a 30 per cent drop over the three-year period.

In 2009, criminal and sexual assaults each accounted for 6 per cent of total student safety incidents reported. However, from 2007 the numbers of reported non-criminal assault, unwanted behaviour of a sexual nature and physical threats increased as a proportion of total reported student safety incidents.

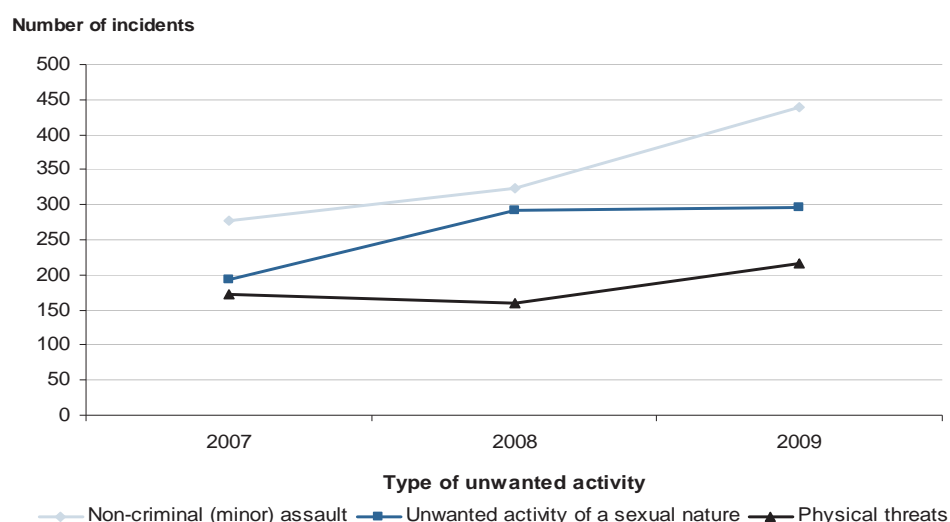
The number of drug related incidents reported by schools rose by 70 per cent between 2007 and 2009 to 34, but remained low compared with the number of students.

Unwanted activity

Unwanted activity accounted for 33 per cent of all student safety incidents in 2009, compared to 31 per cent in 2007.

The most frequently reported unwanted activity was non-criminal (minor) assaults with 439 reports in 2009, rising from 278 in 2007. Reports of unwanted activity of a sexual nature and physical threats also rose in this time as shown in Figure 2B.

Figure 2B
Incidents of unwanted activity, 2007–2009 calendar years



Source: Victorian Auditor-General's Office analysis of Department of Education and Early Childhood Development data.

Occurrences

'Occurrences' accounted for 53 per cent of all student safety incidents in 2009, compared to 45 per cent in 2007.

The most common category of 'occurrence' for the three years 2007 to 2009 was 'falls, trips and slips', which accounted for 34 per cent of all incidents in 2009. The most serious type of 'occurrence' is suicide, although the event may not have happened on the school site. Attempted suicides have risen to 113 in 2009 from 82 in 2007, a 38 per cent increase in three years.

2.4 Student injuries

2.4.1 Background

DEECD developed an information technology system called CASES21 to standardise school administration and finance systems. It can record information about student injuries in schools such as injuries needing first aid, and those needing hospital treatment. DEECD's *Victorian Government Schools Reference Guide* requires principals to record accident details on CASES21.

We have reported student injury data on a calendar year basis.

2.4.2 Overall trend

The number of injuries has trended down for the six years to 2009 and is low relative to the student population. However the incidents are becoming more severe.

2.4.3 Analysis by type and location of injury

Fifty-five per cent of injuries in 2009 were from playground activities, down from 59 per cent in 2003. Of these, about a quarter were with some form of playground equipment.

Total injuries fell to 33 588 in 2009 from 51 105 in 2003. The largest drop was in injuries needing medical or dental treatment, which fell by almost half.

However, within the categories of medical and dental treatment, the number of students requiring hospital treatment rose over the same period by 9 per cent. While the overall number of incidents is decreasing, the severity of incidents is increasing. This could also indicate that schools are increasingly referring injured students straight to hospital.

Figure 2C shows the most common places for student injuries from 2003 to 2009.

2.5 Student opinions on how safe they feel

2.5.1 Background

The student Attitudes to School Survey is an annual voluntary student survey covering student wellbeing, relationships and experiences of teaching and learning. To measure student safety, students were asked to rate how strongly they disagreed or agreed with five statements. Students very strongly agreeing with the statement would score it five on a scale of one to five, and those strongly disagreeing would rate it one. The statements were:

- I have been bullied recently at school.
- I have been teased in an unpleasant way recently at my school.
- Students are mean to me at this school.
- I have been deliberately hit, kicked or threatened by another student recently.
- Other students often spread rumours about me at my school.

To simplify reporting, student responses were reversed so that they could be easily compared with other scores in the survey where a higher mean score represents a more positive result. The most positive score therefore is five. The mean score is obtained by adding together the reversed scores of each student and dividing the total by the number of students completing the survey.

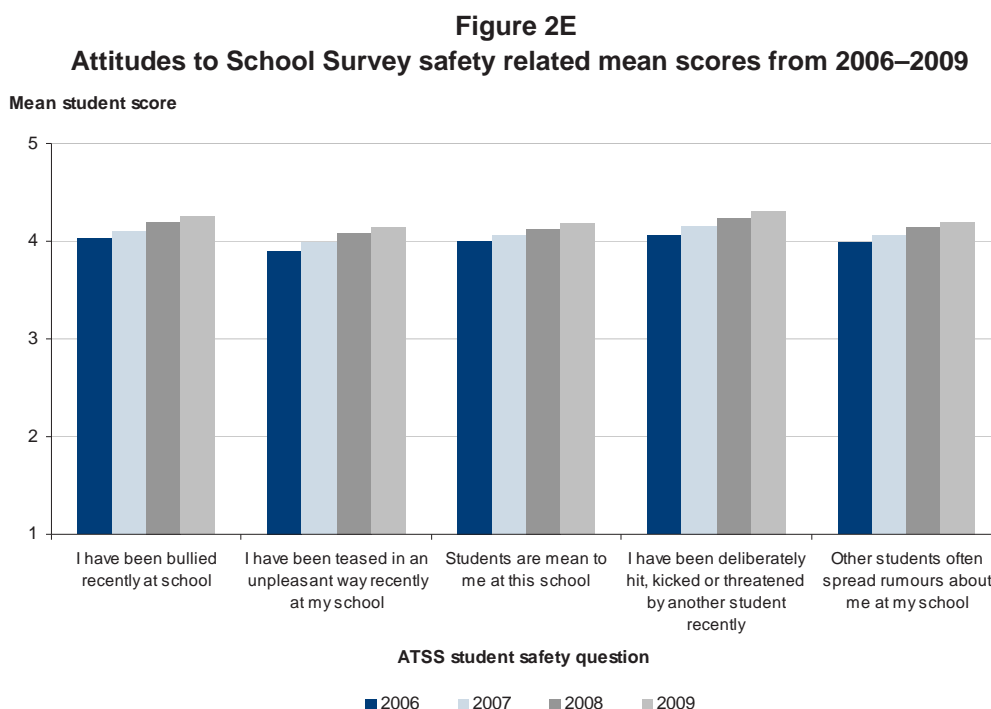
2.5.2 Overall response

Student responses to the safety related statements show that students felt safer in school in 2009 than students did in 2006 and that primary school students generally reported a greater feeling of safety than secondary school students.

2.5.3 Analysis of responses

In 2009 the mean score for each statement was above four, indicating that most students strongly disagreed or disagreed with all of the statements. The lowest scoring statement was 'I have been teased in an unpleasant way recently at my school' while the highest scoring statement was 'I have been deliberately hit, kicked or threatened by another student recently'.

Figure 2E shows the mean scores across all of the survey's safety related statements from 2006 to 2009.



Source: Victorian Auditor-General's Office analysis of the Department of Education and Early Childhood Development's student Attitudes to School Survey data.

The biggest improvement in scores was against the statement 'I have been deliberately hit, kicked or threatened by another student recently' and the smallest was for the statement 'Students are mean to me at this school'.

When the data is broken down by the sex and year level of respondents there is little difference in the results except for secondary school boys. On average, scores for secondary school boys were lower than those for secondary school girls or any grouping of children from primary schools. This was particularly evident for the statement 'I have been deliberately hit, kicked or threatened by another student recently' where the mean score for males was 4.03 compared with a mean score of 4.48 for females.

2.6 Injury and accident claims data

2.6.1 Background

Students injured at school and on school activities can seek compensation from DEECD. The department uses an agent to manage claims, with more serious claims referred for legal advice. This is not part of DEECD's WorkCover policy, which is directed at employees.

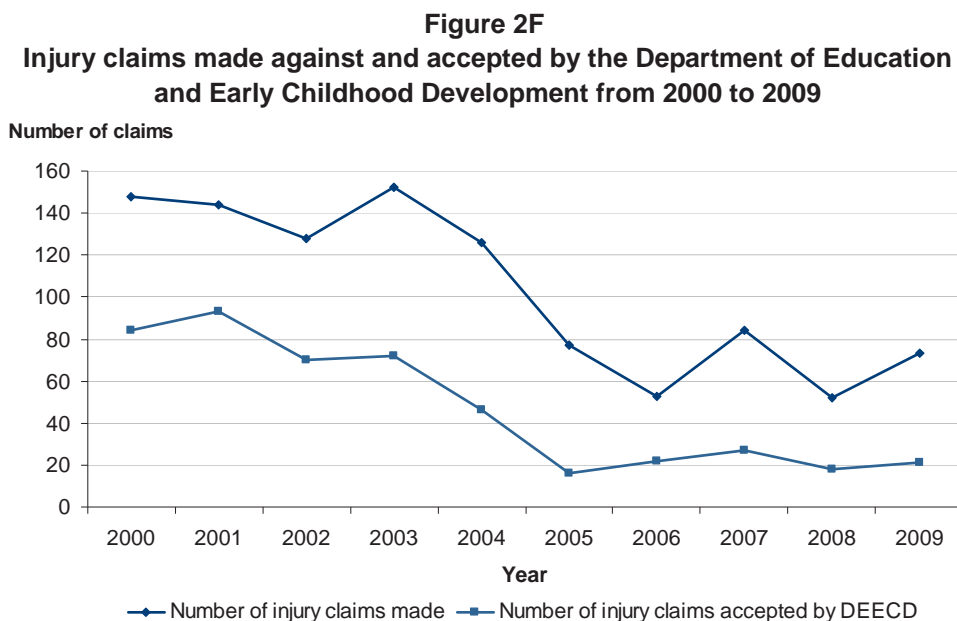
2.6.2 Overall claims trend

For the 10 years to 2009, student injury and accident claims have fallen steadily, affecting only a few students. The average cost of claims has also fallen and is quite low.

2.6.3 Analysis of claims

Student personal injury or accident compensation claims against DEECD fell to 73 in 2009 from 148 in 2000. This suggests that fewer injuries are occurring in government schools. However, it may also reflect the impact of changes to the *Wrongs Act 1958*, which raised the baseline for the severity of injury for which a claim could be made. While DEECD believes that this legislative change has had a significant impact on the total claims experience, it is not possible to reliably determine this from the available data. Nor has DEECD done any analysis in this regard.

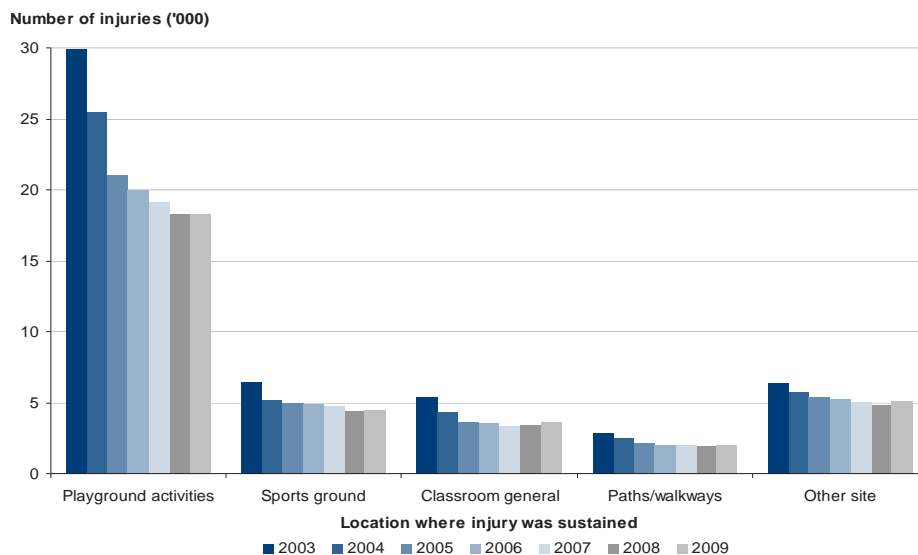
Figure 2F shows the number of claims made against and accepted by DEECD from 2000 to 2009.



Source: Victorian Auditor-General's Office based on Department of Education and Early Childhood Development data.

The average cost of injury settlements from 2000 to 2009 was around \$36 000. Payments made in the last 10 years varied from \$50 to over \$1 million, depending on the severity of the injury, and totalled \$16.7 million. While the total payments each year have fallen in line with the number of claims accepted, the average cost of claims rose between 2000 and 2007 and fell in subsequent years as shown in Figure 2G.

Figure 2C
Common places for student injuries

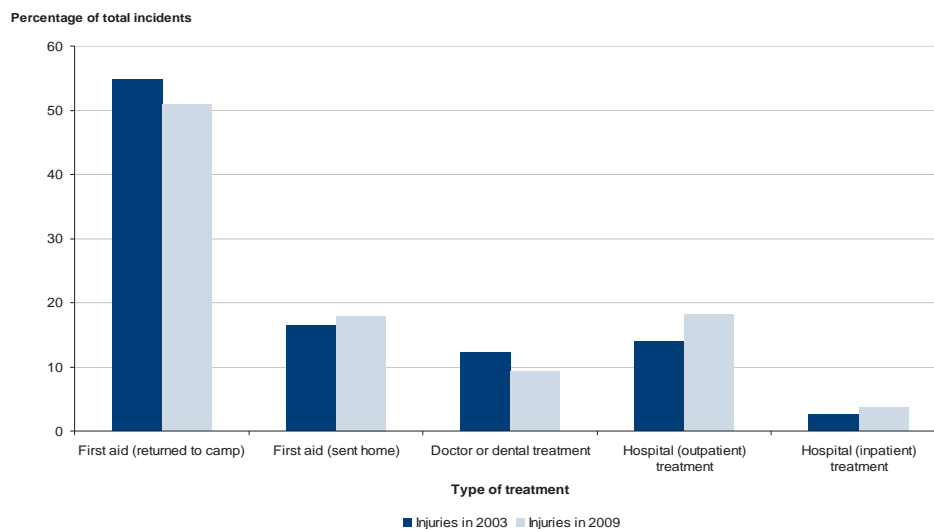


Source: Victorian Auditor-General's Office analysis of the Department of Education and Early Childhood Development's CASES21 data.

As with other less serious injuries, those needing hospital treatment were most commonly caused by playground activities, with 1 106 such incidents in 2009.

Over half of the injuries on school camps in 2009 were treated on site with first aid indicating that they were relatively minor. However 31 per cent needed medical or dental treatment. Figure 2D shows the total proportion of injuries on camps according to their severity.

Figure 2D
Treatment for student injuries at school camps



Source: Victorian Auditor-General's Office based on Department of Education and Early Childhood Development student injury data.

Figure 2G
Injury claim payments 2000–2009

Year	Total (\$000)	Average (\$000)
2000	2 554	30
2001	2 783	30
2002	2 020	29
2003	3 035	42
2004	1 459	32
2005	666	42
2006	1 030	47
2007	1 688	63
2008	975	54
2009	492	23

Source: Victorian Auditor-General's Office based on Department of Education and Early Childhood Development data.

On average, 68 students made injury claims each year from 2005 to 2009 and DEECD denied an average of 68 per cent of them. Thus a student population of 530 000 averaged only 22 successful claims each year. Between 2005 and 2009, 44 cases were set down for trial with DEECD losing four.



3 Managing student safety in schools

At a glance

Background

Principals have a duty to take reasonable measures to prevent foreseeable risks of injury to students. The Department of Education and Early Childhood Development (DEECD) assists principals by providing policies, guidance and specialised support staff such as school nurses and psychologists.

Conclusion

Principals generally believe they comply with DEECD student safety requirements but, as many schools did not complete their self-assessment, DEECD's understanding of how well schools manage student safety is limited.

Findings

- Principals were familiar with risk management concepts, but 85 per cent of those who responded to our survey felt that they would benefit from further training.
- About one in three principals indicated they do not regularly review their school's student safety processes.
- At December 2010, completion rates of school self assessments against the 18 student safety requirements ranged from 56 per cent to 96 per cent.
- Sixty per cent of principals had reviewed their approach to cybersafety in the last 12 months based on DEECD guidance, but many still found it difficult to understand what to do to address this emerging risk.

Recommendations

The Department of Education and Early Childhood Development should:

- identify the practical training needs of principals and staff in risk management standards, methods and practices, and provide that training
- continue to develop its understanding of cybersafety in schools, disseminate clear guidance for schools on the best way to deal with it, and support this with training
- promptly follow-up school non-compliance with School Compliance Checklist requirements and redress.

3.1 Introduction

Principals have a duty to take reasonable measures to prevent foreseeable risks of injury to students. To assist them, the Department of Education and Early Childhood Development (DEECD) provides comprehensive policies and guidance, with specialised support staff such as school nurses and psychologists. Principals are required to assess their school's compliance with these and other DEECD student safety requirements.

As school leaders, principals can design the practices that best suit their schools. This includes using risk management standards.

Using an online survey the audit assessed how well principals believe they are managing student safety. A total of 769 principals responded from 1 555 invitees. The response was enough for the results to represent principals' opinions with 95 per cent confidence. The sample was also demographically representative and showed no bias across size, region or type of school. However, it should be noted that the survey was only a measure of opinion and may not reflect school practice.

We also visited 15 schools across the state and each of DEECD's nine regional offices to validate the survey responses and gain a more detailed view of practices in schools.

3.2 Conclusion

DEECD's student safety policy documents and strategies are soundly based and around two-thirds of principals were satisfied with the support from DEECD in managing student safety. However, principals want and need more guidance on applying risk management principles practically, particularly when dealing with the emerging cybersafety risk.

Principals believe that they generally comply with DEECD's student safety requirements although a high number of schools failed to complete their self-assessment at December 2010. It is important for DEECD to promptly address this failure as it limits its understanding of how well schools are managing student safety.

3.3 Compliance with policies and regulations

The School Compliance Checklist (SCC) is an online self-assessment for principals to manage and monitor their compliance with legislation and DEECD policies, including those on student safety.

The SCC has action points for each item and principals assess their school as being 'fully, partially or non compliant', 'not applicable' or 'not assessed'. DEECD assumes that if a school has assessed itself as 'fully compliant', it has implemented all the action points for that item. Eighteen items have a direct effect on student safety in most schools.

Figure 3A shows that for those principals that had self-assessed at December 2010 most assessed their schools as complying with SCC safety related items.

Figure 3A
School self assessment results for selected student safety items on the School Compliance Checklist

Item description	Fully compliant schools (%)	Partially compliant schools (%)	Non compliant schools (%)	Not applicable schools (%)	Schools that completed assessment	
					(No.)	(%)
Occupational Health and Safety (OHS) – consultation and communication	58.0	41.1	0.9	0	1 062	68.1
OHS – risk management	59.9	38.8	1.3	0	932	59.8
Handling of asbestos	62.5	28.9	0.1	8.5	896	57.5
Drug education*	79.6	19.6	0.4	0.5	1 410	90.4
First aid	79.9	20.1	0	0	1 112	71.3
Anaphylaxis management*	82.4	13.0	0.3	4.2	1 342	86.1
Student Engagement Policy	82.9	16.8	0.2	0.1	1 100	70.6
Playgrounds	82.9	12.1	0	5.0	958	61.4
Work experience requirements	83.7	9.5	0	6.8	367 ^(a)	91.3
Building essential services maintenance*	87.4	12.2	0	0.5	880	56.4
Emergency plan and testing	87.5	12.5	0	0	1 119	71.8
Mandatory reporting	87.5	12.5	0	0	984	63.1
Attendance at school camps	93.9	3.6	0.2	2.3	1 449	92.9
Critical incident reporting	94.3	5.7	0	0	1 158	74.3
ICT – Acceptable Use Policy*	94.4	5.5	0.1	0.1	1 490	95.6
Compensation – student injuries	96.1	3.5	0	0.4	1 399	89.7
Safety for education outdoors	97.5	2.4	0	0.1	1 298	83.3
CASES21 requirements	99.7	0.3	0	0	1 485	95.3

(a) Secondary schools only.

Note: Figures are a percentage of those principals that had completed the self-assessment at December 2010.

* Figures do not add to 100 per cent due to rounding.

Source: Victorian Auditor-General's Office based on Department of Education and Early Childhood Development data.

DEECD required all principals to self-assess against all checklist items, indicating in the assessment if the item does not apply to them. However, completion rates for individual checklist items varied from 56 per cent to 96 per cent. The main safety items not assessed by schools were:

- **Building essential services maintenance (44 per cent)**—inspecting essential services equipment such as fire extinguishers and smoke alarms.
- **Handling of asbestos (43 per cent)**—maintaining an asbestos management plan and using only licensed asbestos removalists.
- **OHS – risk management (40 per cent)**—identifying risks and maintaining current risk and dangerous goods registers.
- **Playgrounds (39 per cent)**—adhering to Australian and New Zealand standards for playground equipment, reporting injuries on CASES21 and reporting serious incidents to DEECD’s Emergency and Security Management Unit.

The failure of schools to self-assess is inconsistent with a positive attitude towards managing student safety. For example, despite over half of the injuries recorded on CASES21 in 2009 being from playground activities, only 61 per cent of schools completed their playgrounds self-assessment.

DEECD is aware of how few principals are completing the SCC and in 2010 reviewed its useability and usefulness. It will be improving the checklist in 2011.

3.4 Risk management

It is incumbent on principals to apply risk management to fulfil their student safety responsibilities. We found that DEECD could better train principals on how to manage risks, and that over a third of principals did not regularly monitor and improve school safety processes.

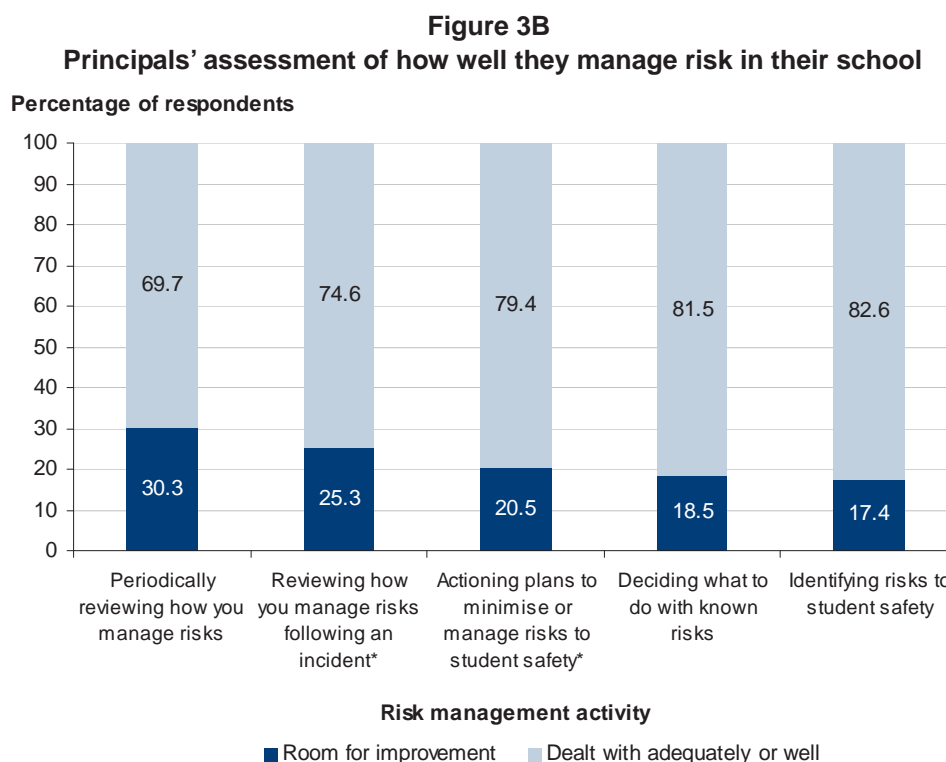
3.4.1 DEECD’s risk management framework

DEECD has a sound risk management framework based on the *Victorian Government Risk Management Framework* (the framework) and aligned with the Australian and New Zealand risk management standard *AS/NZ ISO 31000*. The framework states that school principals must understand, manage, monitor and treat strategic and operational risks in their schools.

It also identifies corporate and operational risks, controls and accountabilities, and outlines DEECD’s risk assurance processes. The framework indirectly addresses aspects of student safety through the Victorian Registration and Qualification Authority’s minimum standards and other requirements for school registration, and DEECD requirements for OHS, emergency management and reporting alleged sexual assaults.

3.4.2 School practices

Figure 3B shows that between 70 and 80 per cent of survey respondents felt they are addressing the key elements of the Australian and New Zealand risk management standard AS/NZ ISO 31000 adequately or well in their schools.



Note: These results refer to general risk management and are not specific to student safety risks.
* Figures do not add to 100 per cent due to rounding.

Source: Victorian Auditor-General's Office.

While over 80 per cent of principals said they could identify risks and decide what to do about them, fewer felt that they adequately reviewed how they manage risks.

Similarly, 61 per cent of principals said they regularly monitor and improve school safety processes. However, 36 per cent of these only said they monitor and improve their safety processes when they perceive there is a problem or following a safety related incident, while 2 per cent said they did not monitor and improve safety processes at all. Eight schools did not answer this question.

Of the 15 principals visited, only five had adequately documented and planned their processes to review and continually improve how they manage student safety risks. The others said they would only review their practices if something went wrong.

About one-third of the respondents and two-thirds of the principals visited do not regularly review their safety processes, which increases the likelihood that these schools are less safe.

3.4.3 Training in risk management

DEECD does not have a standard induction program for new and acting school principals. Instead it has online resources and web links. While the material covers risk management it does not include how to identify and manage risks in schools in practice.

DEECD regional offices run principal induction programs that explain administrative systems and processes, and outline a principal's responsibilities and commitments. No regional office has compulsory practical risk management training for new principals yet all offices indicated that principals could improve their risk management skills.

DEECD does not know which principals have used its online resources and because it does not provide compulsory risk training it cannot know if principals have adequate practical skills to effectively identify and manage risks in their schools.

Eighty-five per cent of survey respondents said they would benefit from further risk management training while 92 per cent said their staff would benefit from further training. Principals identified the main barriers as a lack of time, funding and suitable courses. Those in regional Victoria indicated it was very difficult to identify and access appropriate training.

3.5 Managing major safety risks

DEECD supports schools with policies and guidelines but requires school principals to identify and manage the pertinent student safety risks in their school. Principals who responded to our survey identified traffic safety, bullying and harassment, cybersafety, buildings and grounds, and school camps as the risks they were most concerned about.

We found schools require better support to manage traffic safety and clearer guidance on what they should be doing to address the cybersafety risk.

3.5.1 Workplace safety

The *Occupational Health and Safety Act 2004*, which covers schools as workplaces, sets out the OHS principles and requirements. Under the Act schools must:

- provide the highest level of protection to employees, other persons at work (in this case students) and members of the public against risks to their health and safety
- eliminate or reduce identified risks as far as reasonably practicable
- be proactive and take all reasonably practicable measures to ensure health and safety at schools.

DEECD's OHS policy states that 'DEECD is committed to providing employees, students, contractors and visitors with a healthy and safe environment. DEECD will so far as is reasonably practicable take action to improve and promote health, safety and wellbeing and prevent workplace injuries and illnesses at all DEECD workplaces'.

The DEECD *Victorian Government Schools Reference Guide* states that school principals are responsible for OHS issues in their schools.

OHS practices for schools cover:

- keeping a register of hazards and risks
- maintaining appropriate controls and operating procedures for hazardous plant or materials
- training staff in the safe use of equipment
- employing a trained OHS representative
- conducting visual inspections of buildings and grounds.

Schools assess whether they comply using DEECD's SCC.

School practices

At December 2010, only 60 per cent of principals had assessed their schools against the OHS – risk management item on the SCC. Of the 932 principals that completed the assessment, only 60 per cent assessed their school as fully compliant.

Almost all survey respondents indicated that they walk around their school to identify physical hazards at least once a year, with 42 per cent doing this visual inspection over 10 times a year. Ninety-six per cent of respondents indicated that they had identified safety hazards but 30 per cent said they had only partly addressed them. A lack of resources and time were cited as the most common reasons for not addressing hazards.

While DEECD stipulates that schools must do at least one inspection a term, it has not given schools practical support to make sure that these inspections are comprehensive, well informed and address all potential risks.

The maintenance of buildings and grounds was the fourth highest student safety concern for principals responding to the survey, with 50 principals saying they required more funds for maintenance.

OHS systems in large schools were generally more thorough and better documented. All 15 schools we visited:

- had at least one staff member who had attended the five day OHS representative training course
- kept records of the 'walk-arounds' and hazards—most commonly kept in a hazard book by the maintenance staff or OHS representative.

The high number of playground incidents recorded on CASES21 highlights the imperative that schools have rigorous OHS systems that include regular inspections of school grounds and playground equipment. It also shows students need appropriate supervision at all times. DEECD is implementing a new OHS management system in schools which should help address these issues.

WorkSafe enforceable undertaking

In April 2010 the then Secretary of DEECD signed an enforceable undertaking with WorkSafe after students were injured in two incidents arising from unsafe 'plant' such as drills, lathes and sanders. It committed DEECD to a detailed audit of all plant in all secondary school technology classrooms by 31 December 2010.

DEECD employed two external agencies to audit 19 278 items across 330 schools. The audit entailed a preliminary visit to inspect the plant and a second visit to confirm that schools had implemented the recommendations appropriately. DEECD's December 2010 report on the enforceable undertaking stated that the audit program was complete.

Figure 3C shows the status of the audit findings and corrective actions for DEECD's nine regional offices.

Figure 3C
DEECD audit of plant in secondary school technical classes

Region	Number of plant items inspected	Number of items/issues not resolved		
		Tagging and testing ^(a)	Recommended repairs ^(b)	Significant non-compliances ^(c)
Eastern Metro	2 285	36	166	163
Northern Metro	1 442	77	253	85
Southern Metro	3 035	73	160	225
Western Metro	2 611	95	188	178
Hume	2 031	15	153	55
Loddon Mallee	2 207	15	116	42
Grampians	1 939	1	41	21
Barwon South West	2 062	0	42	13
Gippsland	1 666	2	43	15
Total	19 278	314	1 162	797

(a) Items that have been identified as not having up-to-date electrical testing and tagging as per DEECD's Occupational Health and Safety Management System and Australian Standards.

(b) Items that require repairs which could include missing parts, missing guarding, plant not bolted to the ground etc.

(c) Items that were removed from service at the initial audit visit and required immediate attention. Examples include no emergency stop button, no safety lock system on a vehicle hoist etc.

Source: Department of Education and Early Childhood Development *OHS audit of powered plant in technology rooms in DEECD secondary colleges, P-12 colleges and specialist schools, Results at February 2011.*

Schools are not permitted to operate plant with outstanding non-compliances until DEECD verifies it complies. Its regional OHS advisors will follow up all schools with outstanding non-compliances in the first months of 2011.

Under the WorkSafe enforceable undertaking, DEECD also committed to introduce its new OHS management system to all schools by 30 June 2011.

DEECD released the new system in 2009. It aims to standardise OHS practice in its workforce and to improve workplace safety, including in schools. The new system includes implementation guidelines, partially pre-populated risk registers and an online hazard reporting system.

The system is being rolled out progressively across the state. DEECD has a detailed implementation guide for schools and has nine regional experts to visit schools to introduce and explain the system. They had visited 1 030 schools by December 2010. Following implementation, they will visit all schools again over the next seven years to review their use of the system.

Of the 15 schools visited during the audit:

- four were unaware that a new system was being rolled out
- six had had their first regional expert visit but had done little practical work to incorporate any new practices
- five had had their first regional expert visit and had adopted a number of practices from the system.

3.5.2 Traffic safety

Most schools are built near public roads and, with an average of 340 students per school attending each day, there is a significant risk of serious injury. Many students also travel to and from school on school buses regulated by the Department of Transport.

DEECD names traffic safety as an extreme risk on its schools risk register. Measures to improve the safety of students travelling to and from schools include speed restrictions, flashing signs and crossing attendants.

Almost three-quarters of principals identified traffic safety as a concern, with 215 of this group ranking it as their biggest concern. Principals in the Western and Northern Metropolitan regions named traffic safety as an emerging or increasing risk most frequently, while principals in regional Victoria were generally less concerned.

Five of the 15 principals visited said traffic safety was a major risk at their school. They were concerned about crossings, parent parking, speed restrictions and the school bus service.

Principals are limited in what they can do to improve traffic safety around their schools other than informing students and petitioning other agencies to act on their concerns. The concerned principals were frustrated with processes that involve third party agencies such as the Department of Transport and local councils, and believed that DEECD regional offices could do more to support them.

Establishing a consistent approach to managing traffic safety across all schools that is supported by all relevant agencies would improve the effective management of this risk.

3.5.3 Cybersafety

Cybersafety is an emerging risk for schools. Students use digital technologies including social media, accessing and downloading television, films or music files over the internet and e-commerce. The DEECD policy *Building Safe and Respectful Schools* guides schools on addressing cybersafety, includes how to prevent cyberbullying.

DEECD has defined cyberbullying as 'direct verbal or indirect bullying behaviours using digital technologies. This includes harassment via a mobile phone, setting up a defamatory personal website or deliberately excluding someone from social networking spaces'. While cyberbullying refers to the misuse of digital technologies, it is based on the same premise as any other form of bullying—when someone, or a group of people, deliberately upset or hurt another person or damage their property, reputation or social acceptance on more than one occasion. As such, technological solutions alone are unlikely to resolve cyberbullying.

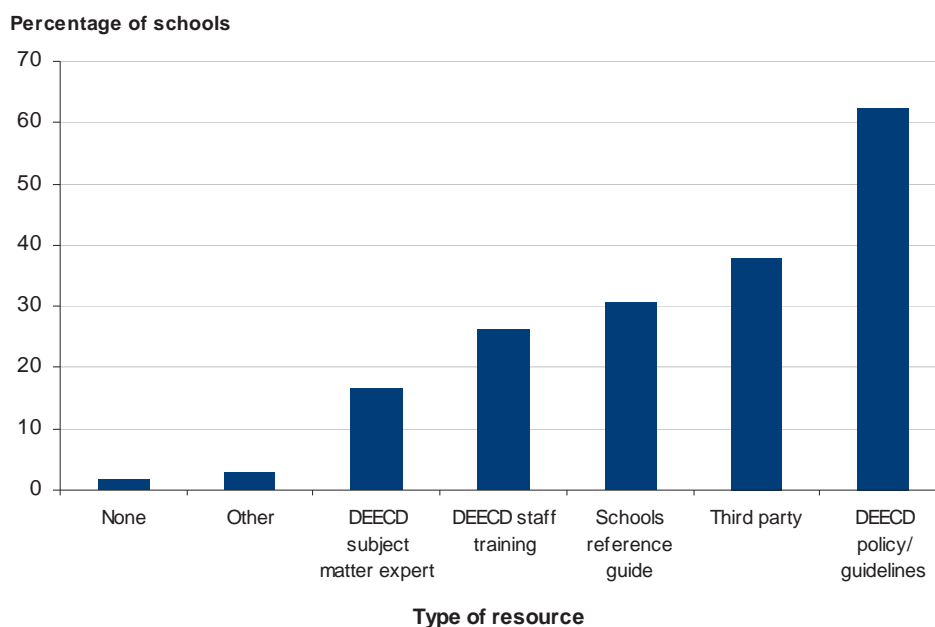
Although DEECD provides schools with extensive information on cybersafety, it has not clearly defined how schools should deal with cyberbullying.

Cybersafety (including cyberbullying) was the third largest student safety concern of surveyed principals. Three-quarters of them, especially principals from Loddon Mallee, Western Metropolitan and Eastern Metropolitan regions, said it was an emerging or increasing risk to student safety.

Around 60 per cent of respondents said they had developed or reviewed cybersafety policies and guidelines during 2010, which suggests that many principals are actively managing cybersafety. Sixty-two per cent said they used DEECD policies and guidelines to do so.

Figure 3D shows the resources principals said they used to develop their cybersafety policies and guidelines.

Figure 3D
Resources principals use to develop cybersecurity policies and guidelines



Note: Third parties are organisations or individuals from outside DEECD that have been engaged directly by schools to provide guidance or assistance.

Source: Victorian Auditor-General's Office survey of principals. Answers based on responses from 729 principals.

Ten principals visited said one of the main problems with cyberbullying is that it mostly occurs outside school hours. They cited examples where parents allowed under-age students unmonitored access to social networking sites, students posted highly offensive material about other students and teachers, and fights broke out on a social media site between students.

To address this, over 90 per cent of principals said they have tried to engage students and parents on cybersecurity. This was through acceptable use agreements with parents and children, school newsletters, in-class teaching and the school code of conduct. However, little use was made of websites to educate parents—only four school websites addressed cybersecurity and no DEECD regional office websites had information on cybersecurity. Similarly, neither the homepage nor the 'parents' section of DEECD's website has information or direct links to information about cybersecurity.

However, while it can be difficult to locate, DEECD had information on cybersecurity on its website and E-learning website. While half of the principals visited said that DEECD's website was a valuable resource on cybersecurity issues, the volume of information obscured what DEECD wanted principals to do and how they should do it. Similarly, parents trying to access information via DEECD's website might also find the volume of the content and references more confusing than helpful.

Given the emergence of cybersafety as a significant risk to student safety, it is important for cybersafety guidance and advice for parents to be more prominent on all DEECD and school websites.

3.5.4 School camps and excursions

Students regularly go on school camps and excursions. Such activities pose a potential risk of harm as the school does not have the same degree of control of the external environment.

The *Victorian Government Schools Reference Guide* states that 'principals must ensure that adequate pre-excursion planning and preparation, including the preparation of students, takes place'.

The *Victorian Government Schools Reference Guide* also states that the school principal must approve all excursions and the school council must approve the following activities:

- overnight excursions
- camps
- interstate and international visits
- sea or air travel
- excursions over weekends or vacations
- adventure activities.

Two survey respondents said they did not always secure school council approval for students to attend school camps. Twenty-nine principals said they did not always get school council approval for students to participate in adventure activities and 23 principals (3.2 per cent) said they never secured school council approval for adventure activities. While these numbers are low, this breaches DEECD excursions policy.

3.5.5 Student behaviour management

Bullying and other forms of unacceptable behaviour can negatively affect student learning. Therefore it is essential that schools manage student behaviour robustly and create a positive, supportive learning environment for all students.

In 2009 DEECD revised its guidance for schools on managing student behaviour—*Effective Schools are Engaging Schools: Student Engagement Policy Guidelines*. The guidelines aim to support schools to create a positive school culture, and outline processes and actions to improve student engagement and the consequences of student disengagement.

In 2010 DEECD published a guide on dealing with inappropriate behaviour and bullying—*Building Safe and Respectful Schools: A resource for school communities*. This was written mainly to address gender-based violence and to expand and update information on the department's approach to bullying. DEECD has supported *Building Safe and Respectful Schools* with more guidance on how to teach students about gender-based violence and its regional offices are introducing a professional learning strategy for school staff.

While it is too early for DEECD to assess the effect of the extra guidance or learning strategy, it has not clearly stated what it expects to achieve.

School practices

Bullying and harassment were the second highest concerns for principals who responded to our survey. They also felt well prepared to manage them. Principals and their staff trained more in reducing school bullying and harassment than any other form of safety issue, with over half of the principals getting training from DEECD.

DEECD requires every school to prepare a student engagement policy articulating the rights, responsibilities and shared expectations of everyone in the school community. Schools report their compliance with this requirement using the SCC.

At December 2010, 29 per cent of principals had not assessed their school's compliance with the student engagement policy requirements in the SCC. Of the 1 100 principals that had assessed their schools, 83 per cent reported their schools as fully compliant.

Concurrently, DEECD's regional offices have been assessing the quality and appropriateness of schools' student engagement policies. However, DEECD has acknowledged that there is no consistent approach by regions and no review of results by its central office. All schools we visited had student engagement policies.

Mandatory reporting of sexual assaults

DEECD and the Department of Human Services have clear and comprehensive guidance for schools on how school staff should respond to an allegation or disclosure of student sexual assault. There is a 56 page booklet on responding to allegations of sexual assault which covers the definition of sexual assault, managing allegations of sexual assault, and support for schools dealing with allegations of sexual assault. This is also on the DEECD website with other information such as a reporting flow chart and information booklets for parents and carers.

DEECD also has a Critical Incident Advisory Unit to offer practical, real-time support to principals and other school staff dealing with allegations of sexual assault.

DEECD's Critical Incident Advisory Unit is confident that schools are following the mandatory reporting guidelines, but had no evidence to support this.

3.6 Principals' opinions on DEECD support

We asked principals about the support they received from DEECD to meet their student safety responsibilities.

Sixty-five per cent felt DEECD supports them well in managing student safety, 28 per cent said support was poor and 7 per cent said support was very poor:

- Sixty-five per cent of primary school principals, 61 per cent of secondary school principals, 55 per cent of P–12 school principals and 73 per cent of special schools felt well supported.
- Principals at the smallest 40 per cent of schools (with fewer than 173 students) were the most satisfied with DEECD support, with 69 per cent indicating they were well or very well supported. Sixty-two per cent of principals from schools with more than 173 students felt they were well or very well supported.
- Over 70 per cent of school principals in the Grampians and Northern Metropolitan regions felt well supported by DEECD. Fifty-one per cent of principals in the Barwon South West region felt well supported.

The most commonly indicated aspects where support could be improved were:

- OHS and risk management
- training in student safety matters
- dealing with behaviour management issues.

Recommendations

The Department of Education and Early Childhood Development should:

1. identify the practical training needs of principals and staff in risk management standards, methods and practices, and provide that training
 2. continue to develop its understanding of cybersafety issues in schools, disseminate clear guidance for schools on the best approach to dealing with cybersafety, and support it with training
 3. promptly follow-up the reasons for school non-compliance with School Compliance Checklist requirements and redress.
-

4 Monitoring school performance

At a glance

Background

Although schools are responsible for the day-to-day safety of students, the Department of Education and Early Childhood Development (DEECD) is accountable for performance and responsible for monitoring how well schools manage student safety.

Conclusion

As DEECD is not effectively monitoring how well schools manage student safety, its interventions to address safety incidents are more likely to be reactive rather than preventative and timely.

Findings

DEECD:

- does not assure the reliability of student safety data reported by schools
- does not systematically analyse student safety data to better inform it on how well schools manage student safety risks
- has not established incident and injury targets or benchmarks for assessing school performance
- does not have a rigorous assessment program to determine the reliability of school self-assessments of their compliance with student safety requirements.

Recommendations

The Department of Education and Early Childhood Development should:

- assure the reliability of school safety data by:
 - improving data consistency by clarifying what needs to be reported, when, where and why
 - minimising duplication across the IRIS and CASES21 systems to improve the quality of the data, the efficiency of recording and reporting, and to reduce administration for principals and staff
- regularly monitor and analyse data to make best use of the information from schools
- establish incident and injury targets and benchmarks to enable assessment of school performance
- develop its Schools Compliance Checklist verification program to include a full and detailed audit program, and implement that program.

4.1 Introduction

The Department of Education and Early Childhood Development (DEECD) is responsible for providing a safe, secure and stimulating learning environment for students. As schools have the day-to-day responsibility for this, DEECD's task is to monitor their performance.

DEECD requires schools to self-assess their compliance with student safety policies, procedures and regulations, and to record incidents and injuries involving students.

We examined DEECD's systems and processes to determine whether it is effectively monitoring how well schools fulfil their student safety responsibilities.

4.2 Conclusion

DEECD is not effectively monitoring how well schools manage student safety. As a result, it cannot be certain that students are safe and that schools are doing everything possible to make them safe.

DEECD does not assure the reliability of school student safety data. Nor does it systematically analyse the data using targets or benchmarks to identify trends over time and to assess school performance against its expectations. DEECD's approach to assuring school compliance with its policies, procedures and regulatory requirements also has shortcomings such as not rigorously assessing the reliability of school self-assessments.

Accordingly, DEECD is not well placed to identify the relative risk exposures of schools or determine when and where to intervene.

4.3 Recording and reporting incidents and injuries

DEECD uses two information technology systems to record and report information about student safety in its schools—the Incident Reporting Information System (IRIS) records safety related incidents at schools and CASES21 records student injuries at school.

4.3.1 Limitations with IRIS data

DEECD's Emergency and Security Management Unit (ESMU) is a 24-hour emergency coordination centre where schools report safety incidents. It records reported safety incidents on IRIS, which then alerts staff in DEECD central and regional offices by text message.

This system allows DEECD to monitor incidents in real time and to support schools with resources as needed. However, IRIS data reliability is compromised because schools do not understand what and how much to report.

Understanding what to report

DEECD's *Victorian Government Schools Reference Guide* states that 'any incident in which the safety of staff or students is at risk, or which poses a threat to property or the environment, must be reported immediately'. The guide defines a serious incident as one requiring medical attention or a police investigation. The guide lists 32 example incidents, although many, such as minor neighbourhood complaints and minor graffiti, would not meet this definition.

Ten of the 15 principals visited said they used common sense or relevance for reporting rather than DEECD guidelines. Three of these schools were not aware of the list of reportable incidents.

The issue of what to report is further confused by the overlap between IRIS and CASES21. For example, if a child trips in the playground and needs medical treatment from a doctor, the school could potentially report the incident in CASES21, to the ESMU or both. The CASES21 administration user guide clearly advises on such incidents, stating 'If you are recording an accident where an injury occurred that required medical or dental treatment, or a visit to a hospital, you must...also notify Emergency Security Management as soon as practicable...'

Seven of the 15 principals visited said they may not report such incidents to the ESMU and three believed incorrectly that recording such incidents on CASES21 would automatically populate the IRIS database.

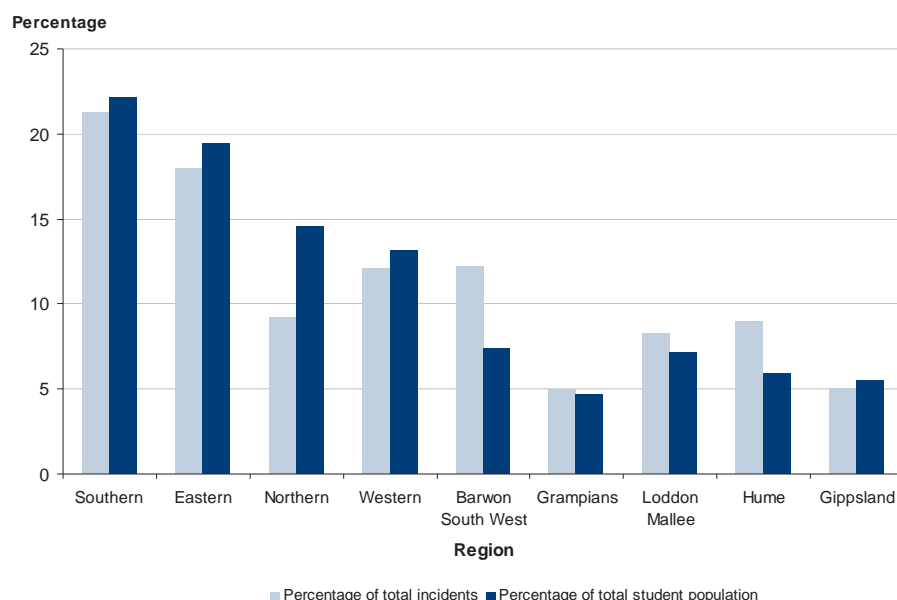
Three principals we visited said they do not report all incidents they believe they should and one said they under-reported incidents that occur outside the school because they do not want them to reflect badly on the school. DEECD staff in two regions echoed this sentiment, saying they had had feedback from schools suggesting they deliberately did not report some incidents.

Completeness of data

Our analysis of IRIS data shows that 430 schools did not report a single critical incident in 2009 which suggests the data is incomplete. Staff at all DEECD regional offices have also expressed concerns about the reliability of this data. For example, the Barwon South West regional office says its regional network leaders have been targeting selected schools that may be under-reporting to try to improve the consistency and quality of the information.

Our analysis also identified that the number of incidents reported by each region in 2009 was not always commensurate with the size of the student population in the region which suggests the reported data is incomplete. Figure 4A compares the proportion of incidents with the school population across the region.

Figure 4A
Distribution of incidents and student population across regions 2009



Note: Southern, Northern, Eastern and Western are DEECD's four metropolitan regional offices. Barwon South West, Hume, Loddon Mallee, Gippsland and Grampians are DEECD's five rural regional offices.

Source: Victorian Auditor-General's Office analysis of Department of Education and Early Childhood Development data.

The large variation between the percentage of reported incidents compared to the percentage of the student population located in the Northern, Western and Eastern regions shown in Figure 4A suggests that their data is incomplete. However, the results in the Barwon South West, Hume and Loddon Mallee regions suggest potential over reporting. Barwon South West advised that this is largely due to the regional office targeting schools thought to be under reporting incidents.

4.3.2 Limitations with CASES21 data

CASES21 is an information technology system designed to standardise school administration and finance systems. DEECD requires principals to record all accident details on CASES21 because data cannot be transferred between this system and IRIS.

Completeness of data

DEECD does not have adequate controls to know if all injuries are recorded on CASES21 and whether all schools are using it.

Our analysis of CASES21 data shows that 16 per cent of schools did not record any first aid incidents in 2009. Of these, 52 per cent had over 100 students. Sixty-two schools with over 100 students did not report a single first aid incident in the three years to December 2009. While not impossible, it is highly improbable that any school with over 100 students would not have a single first aid incident over one year let alone three years. This suggests that total incidents were higher than the reported figure.

4.3.3 Analysis of incident and injury data

DEECD uses the IRIS data to assist schools to manage student safety incidents case by case and its regional offices periodically review the data to identify trends and target resources.

DEECD does not systematically analyse IRIS or CASES21 data to establish how well schools manage student safety. Nor has it set a target or benchmark of the expected level of severity and frequency of incidents that would enable it to measure whether a school's approach to managing student safety is effective. If it could encourage schools to record all incident data on CASES21 it could better inform its approach to managing injuries to students.

For example, the number of students requiring hospital treatment as a result of a classroom incident rose from 179 in 2005 to 237 in 2009. There is no evidence showing how DEECD interpreted or acted on such data.

4.4 Monitoring compliance with policies and regulations

4.4.1 School Compliance Checklist

DEECD does not rigorously assess the reliability of schools' self-assessments under the School Compliance Checklist (SCC). The SCC covers DEECD student safety policies and procedures and regulatory requirements but it needs more work to become a reliable, easy-to-use tool for principals to comply with regulations.

DEECD intends to regularly review the quality and accuracy of the SCC self-assessments. In 2008 it audited the quality and accuracy of 3 per cent of school self-assessments for a selection of SCC items. It has not audited since then. While DEECD intends to regularly audit more schools, it has no program detailing when or what SCC items it will focus on. Given that two years has elapsed since the last audit, and there is no sound audit program, it appears unlikely that it will regularly audit the SCC in the near future.

DEECD reports quarterly to its divisional general managers and the Deputy Secretary of the Office for Government School Education. However, an audit of the SCC conducted by DEECD in December 2010 found that in some instances it has not used the quarterly report data to follow up schools on their self-assessments. DEECD intends to address this in the first few months of 2011.

We also found that less than 75 per cent of schools had self-assessed against 11 of the student safety SCC items whereas all schools are supposed to self-assess against all 18 items. This further inhibits the reliability of this monitoring tool.

4.4.2 Compliance with school registration safety standards

The Victorian Registration and Qualifications Authority (VRQA) registers schools and monitors them for compliance with the *Education and Training Reform Act 2006* and related minimum standards. Under an agreement (MoU) with VRQA, DEECD reports annually to VRQA on school compliance with the minimum standards, including student safety standards.

The MoU requires DEECD to inform the VRQA, through an annual report, of any government school that does not satisfy the criteria for assessing compliance with one or more of the prescribed minimum standards. The criteria for assessing compliance for care, safety and welfare of students states that compliance is effected by having the following system-wide policies and guidelines to assist schools to comply with the minimum standards:

- that require schools to prepare an Emergency Management Plan
- that require schools to have a critical incident reporting procedure and ensure that all incidents where the safety of staff and students is at risk are immediately reported to DEECD's Emergency and Security Management Unit
- for reporting accidents, school excursions, safety in the curriculum (chemicals, machinery), preparing food, cycling to school, etc
- for administering first aid and medications; treating anaphylaxis and infectious diseases; skin protection, school health and dental services, and pregnancy at school
- for student care and supervision, including student support services, mandatory reporting of child abuse and neglect, drug education and smoking, and release of student information
- for student engagement including student discipline.

Although DEECD has these policies and guidelines, it cannot assure VRQA that its schools comply with them. The MoU only requires DEECD to report to VRQA that it has these policies and guidelines, not on how fully schools comply with them.

Recommendations

The Department of Education and Early Childhood Development should:

4. assure the reliability of school safety data by:
 - improving data consistency by clarifying what needs to be reported, when, where and why
 - minimising duplication across the IRIS and CASES21 systems to improve the quality of the data, the efficiency of recording and reporting, and to reduce administration for principals and staff
 5. regularly monitor and analyse data to make best use of the information from schools
 6. establish incident and injury targets and benchmarks to enable assessment of school performance
 7. develop its Schools Compliance Checklist verification program to include a full and detailed audit program, and implement that program.
-

Appendix A.

Audit Act 1994 section 16— submissions and comments

Introduction

In accordance with section 16(3) of the *Audit Act 1994* a copy of this report was provided to the Department of Education and Early Childhood Development with a request for submissions or comments.

The submissions and comments provided are not subject to audit nor the evidentiary standards required to reach an audit conclusion. Responsibility for the accuracy, fairness and balance of those comments rests solely with the agency head.

Submissions and comments received

RESPONSE provided by the Acting Secretary, Department of Education and Early Childhood Development



**Department of Education and
Early Childhood Development**

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29 MAR 2011

Mr Des Pearson
Auditor-General
Victorian Auditor-General's Office
Level 24, 35 Collins Street
MELBOURNE 3000

Dear Mr Pearson

Thank you for your letter of 17 March 2011 inviting management comments on the proposed report for the performance audit of *Managing Student Safety*.

I request that the attached management response be included in the report for tabling.

The Department's contact is [REDACTED], General Manager, Portfolio Governance and Improvement Division, telephone [REDACTED], should you wish to discuss the response and any related matters further.

Yours sincerely

Jeff Rosewarne
Acting Secretary



RESPONSE provided by the Acting Secretary, Department of Education and Early Childhood Development – continued

**VAGO Audit
Managing Student Safety, March 2011**

DEECD Management Response:

The Department welcomes the opportunity to comment on the audit report and in general accepts the key findings and recommendations. The Department's specific management response for each recommendation is outlined below.

Number	Recommendation
1	<p>The Department of Education and Early Childhood Development should:</p> <p>Identify the practical training needs of principals and staff in risk management standards, methods and practices, and provide that training.</p> <p>DEECD Response: Recommendation is accepted</p> <p>Comments: The Department is developing an enhanced Risk Management Framework which will provide training for principals and guidance in the management of risk within schools. Aligned with the enhanced Framework, the Department is developing risk management capacity in the education and early childhood workforce through the Bastow Institute of Educational Leadership.</p>
2	<p>Continue to develop its understanding of cyber safety issues in schools, disseminate clear guidance for schools on the best approach to dealing with cyber safety, and support it with training.</p> <p>DEECD Response: Recommendation is accepted</p> <p>Comments: The Department provides advice on cyber safety and educating young people to be responsible users of mobile and digital technologies through the Learning On Line website. The Department is committed to continued improvement, keeping pace with current research and building on existing work in the field.</p>
3	<p>Promptly follow-up the reasons for schools non-compliance with School Compliance Checklist requirements and redress.</p> <p>DEECD Response: Recommendation is accepted</p> <p>Comments: The Department is reviewing the School Compliance Checklist (SCC). Through this review, Department program areas will be supported to follow up schools' non-compliance and to better understand reasons for non-compliance.</p>

RESPONSE provided by the Acting Secretary, Department of Education and Early Childhood Development – continued

4	<p>Assure the reliability of school safety data by:</p> <ul style="list-style-type: none"> o Improving data consistency by clarifying what needs to be reported, when, where and why; o Minimising duplication across the IRIS and CASES21 systems to improve the quality of data, the efficiency of recording and reporting, and to reduce administration for principals and staff. <p>DEECD Response: Recommendation is accepted</p> <p>Comments: The Department has reviewed the current emergency management policies and practices and developed a single overarching Emergency Management (EM) Framework approved for implementation across the portfolio. In line with the implementation of the EM Framework and the Reducing Red Tape Program, school safety data will be reviewed and data collection systems streamlined.</p>
5	<p>Regularly monitor and analyse data to make best use of the information from schools.</p> <p>DEECD Response: Recommendation is accepted</p> <p>Comments: The Department will address this issue in the context of implementing Recommendation 4, acknowledging that the monitoring and evaluation of data make a significant contribution to informing, and the delivery of, future policy initiatives.</p>
6	<p>Establish incident and injury targets and benchmarks to enable assessment of school performance.</p> <p>DEECD Response: Recommendation is accepted in part</p> <p>Comments: The Department will address this issue in the context of implementing Recommendation 4, recognising the benefits of establishing benchmarks to assist in monitoring and reviewing performance. The Department will then consider the suitability of system wide targets.</p>
7	<p>Develop its Schools Compliance Checklist verification program to include a full and detailed audit program, and implement that program.</p> <p>DEECD Response: Recommendation is accepted</p> <p>Comments: The Department will address this issue in the context of implementing Recommendation 3.</p>

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Motorcycle and Scooter Safety Programs (2010–11:21)	February 2011

Report title	Date tabled
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Environmental Management of Marine Protected Areas (2010–11:23)	March 2011
Managing Drug and Alcohol Prevention and Treatment Services (2010–11:24)	March 2011
Local Community Transport Services: the Transport Connections program (2010–11:25)	March 2011
Effectiveness of Small Business Victoria's Support Programs (2010–11:26)	March 2011
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