

Appendix A:

Submissions and comments

We consulted with the Department of Education and WorkSafe Victoria and considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the relevant agency head.

Responses received

Agency	Page
Department of Education	A-2
WorkSafe Victoria	A-5



Department of Education

Secretary

2 Treasury Place
East Melbourne Victoria 3002
Telephone +613 9637 2000

COR25160450

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
[REDACTED]

Dear Mr Greaves

Proposed report: Work-related violence in government schools

Thank you for your letter of 15 April 2025 and the opportunity to comment on the proposed report.

The safety and wellbeing of school staff, students and members of the school community are of paramount importance to the department. The department is committed to supporting schools to maintain positive school cultures that are safe places to work and to learn.

The management of work-related violence resulting from student behaviour is highly complex. Student behaviour can be influenced by multiple factors including influences outside of the school environment. Schools must balance a range of competing legal obligations to support students to attend school, encourage inclusion and protect the safety of staff. The department notes VAGO's findings regarding the provision of staff resources and training to manage work-related violence resulting from student behaviour.

Reporting of hazards and incidents is important and as part of the department's systems for keeping school staff safe, school staff are encouraged to report work-related violence hazards and incidents. The department has a comprehensive system for measuring and responding to all matters relating to staff safety, including work-related violence and is confident in the mechanisms we use to understand staff experiences and continuously improve policies and procedures while minimising administrative burden. The department will assess changes to our data reporting structures to align with VAGO's recommendations.

The department has reviewed the proposed report and accepts 2 recommendations in full. The remaining 2 recommendations are accepted in principle as the department will need to assess the feasibility, costs and workload burden of the change, associated risks and business requirements. The action plan to address the recommendations in the report is attached.



Should your office wish to discuss the department's response, please contact [REDACTED]
[REDACTED] on [REDACTED] or
[REDACTED].

Yours sincerely

[REDACTED]

Tony Bates PSM
A/Secretary
09 / 05 / 2025

Encl.: The department's action plan

DE action plan: Work related violence in government schools

#	Recommendations: That DE:	Response	The Department will:	By:
1	Establish a mechanism to better estimate under-reporting of work-related violence resulting from student behaviour.	Accept	1.1 introduce data references from existing surveys to validate the measure of work-related violence and demonstrate the extent of under-reporting by schools. The department will reference the available data references when reporting on work-related violence to executive governance groups.	30 Nov 2026
			1.2 continue to promote the importance of schools reporting incidents and hazards on eduSafe Plus through communications and school visits by the OHS Service Officers.	30 March 2026
2	Review and fix data issues to ensure incidents are reported completely to the department's executive leadership.	Accept in principle	2.1 include incidents of sexual harassment, bullying and psychological stress recorded by staff and contractors in reports to executive governance groups such as the Culture, People and Integrity Committee (CPIC) and Executive Board.	30 May 2026
			2.2 develop a paper that describes the options for system enhancements to ensure consistent reporting of work-related violence, whether they are reports made by principals relating to impact on school operations, or hazard or incident reports made by staff. The paper will consider the consistency of mandatory fields between different types of reports, and the costs and workload burden of this change. The outcome of the paper will be actioned through the necessary approvals.	30 June 2026
3	Strengthen the approach to reviewing and updating all policies and procedures for managing work-related violence as an OHS issue.	Accept	3.1 develop a plan for endorsement by CPIC to guide the review of the OHS Management System policies.	30 Nov 2025
4	Ensure there is consistent criteria on when to conduct post-incident reviews and incorporate the lessons learned into policy reviews.	Accept in principle	4.1 develop an options paper, with recommendations, taking a risk-based approach, for the relevant department governance body to decide when and how post-incident reviews should be undertaken to enable consistency across the system with clear criteria. The paper should explore the benefits, costs, administrative burden and workload for schools and the department of each option.	30 June 2026
			4.2 develop a mechanism by which lessons learned from post-incident reviews data informs policy reviews.	30 June 2026



**Reducing
workplace
harm.**

**Improving
outcomes for
injured workers.**

WorkSafe Ref: CEO25-2730

29 April 2025

Mr Andrew Greaves
Auditor-General
Level 31, 35 Collins Street
MELBOURNE VIC 3000

By email: [REDACTED]

Cc: [REDACTED]

Dear Mr Greaves

Thank you for your letter of 15 April 2025 regarding the Victorian Auditor-General's proposed report for its audit into work-related violence in government schools.

We have reviewed the redacted proposed report and WorkSafe has no further feedback.

If you wish to discuss this further, please contact [REDACTED]
[REDACTED] on [REDACTED] or [REDACTED].

We thank VAGO for the ongoing engagement throughout this audit.

Yours sincerely



Ashley West
Chief Executive Officer
WorkSafe Victoria