ENVIRONMENTAL RESTRAINTS PLANNING PROCEDURES

Implementation document for the Restrictive Practices Reduction and Elimination policy

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Contact: Director, Disability Strategy

Email: Correspondence-DisabilityStrategy@det.nsw.edu.au

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1   Definitions

Behaviours of concern – These are challenging, complex or unsafe behaviours that requires more persistent or intensive interventions. Behaviours of concern include behaviour unsafe to the student, staff or other students, or behaviour that puts the student or others at risk of psychological or physical harm. It does not include low-level, developmentally appropriate behaviours, such as testing boundaries and rules, which can be redirected and minimised through universal behaviour support strategies. Behaviours of concern require intensive and individualised interventions in addition to targeted and universal strategies. See the care continuum.

Decision-making principles – The use of restrictive practices in all NSW public schools, school-related activities (including excursions, cultural activities, sporting and social events) and students using the Assisted School Travel Program must be guided by the following 6 decision-making principles – student-centred, least restrictive, for the shortest time, helping to reduce and eliminate restrictive practices, monitored, and reviewed regularly.

Environmental restraint – Environmental restraint refers to physical barriers or boundaries, including some types of fences and locks, that are used to prevent an individual student from freely exiting a space or accessing some parts of their school environment. See the Environmental restraint fact sheet (PDF 644 KB) for more information.

Individual student support plan – Schools may have a range of individual plans for different needs that cover behaviour, support or potential risks. These plans will specify a range of evidence-based, student-centred and proactive strategies that focus on the individual needs of the student in different circumstances.

Prohibited practices – Practices that must never be used in schools because they interfere with basic human rights, are unlawful and unethical in nature, and are incompatible with the NSW disability principles as outlined in the Disability Inclusion Act 2014. Schools should refer to the Restrictive Practices Reduction and Elimination policy for a list of prohibited practices.

Restrictive practices – A restrictive practice is any action that has the effect of restricting the rights or freedom of movement of a person, with the primary purpose of protecting the person or others from harm. There are 5 categories of restraint – seclusion, chemical, mechanical, physical and environmental. For more information, see the department's Restrictive Practices Framework (PDF 6 MB).

Seclusion – Leaving a child or young person alone in a room or area from which they are prevented from leaving, or reasonably believe that they cannot leave, by a barrier or another person, for any length of time. This includes situations where a door is locked as well as where the door is blocked by other objects or held closed by another person.

Universally safe assets and infrastructure – Universally safe assets and infrastructure are standard security or health and safety practices and are appropriate in all school settings. Some universally safe assets and infrastructure might be restrictive; however, they align with normal community standards. Universally safe assets and infrastructure have some or all the following characteristics – they reflect the provision in all school settings, the area is not considered part of the student's school environment, and/or the area presents a significant risk of injury or illness. Schools only use these practices for the purposes set out in Appendix A.

2 Overview

2.1 Purpose of this document

This document supports the implementation of the Restrictive Practices Framework (PDF 6 MB) and Restrictive Practices Reduction and Elimination policy. This document complements the Restrictive Practices Planning Procedures (PDF 275 KB) and provides additional guidance for schools and government preschools planning and reviewing the use of environmental restraints where necessary. It also outlines the requirements for seeking authorisation for new or modified environmental restraints.

2.1.1 Legal principles for using environmental restraints

When making decisions about the school environment, schools need to be aware of areas in their school environment where a student could potentially be restricted or secluded, and ensure everyone understands how to use these areas appropriately.

Schools need to undertake due diligence to make sure that the use of an environmental restraint is reasonable, in line with the principles below and meets the department's legal obligations under duty of care or work health and safety legislation.

Schools need to consider whether the use of an environmental restraint:

- could be false imprisonment if it is not necessary in the circumstances to meet either duty of care or obligations under the Work Health and Safety Act 2011
- could give rise to unlawful discrimination against students with disability. See the Legal Issues bulletin on disability discrimination for further details
- is being used for disciplinary purposes or for other purposes that do not relate to managing reasonably foreseeable risks of harm or health, safety and wellbeing concerns. This is a prohibited practice under the Restrictive Practices Reduction and Elimination policy
- has been planned, documented and consented to by the student's parents and/or carers
- will have an impact on other students and whether consultation is needed with the parents and/or carers of impacted students (section 2.1.2).

2.1.2 Consultation requirements for environmental restraint

Schools must consider how the planned use of an environmental restraint may impact the learning environment of all of those involved. If it is identified that other students will be impacted, further consultation may be required with the students and their parents and/or carers.

When considering the impact, the decision-maker must consider the:

- risk of harm to the students being impacted
- level of restraint
- length of time the students will need to be restricted.

Consultation must occur with the parents and/or carers of any students with disability whose existing adjustments may be affected by the environmental restraint or who may need other adjustments as a result. However, their consent is not required.

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2.1.3   Universally safe assets and infrastructure

In schools, most assets and infrastructure will likely be considered universally safe. This includes perimeter fences, lockable external school gates, locks on areas that contain hazardous materials and locks on administrative and staff spaces. These assets and infrastructure are always allowed so the whole school community is safe and secure. They do not need to follow the authorisation process for environmental restraints.

Universally safe assets and infrastructure have some or all the following characteristics:

- they are provided in all school settings as part of the standard school design
- the area is not considered part of the student's school environment
- the area presents a significant risk of injury or illness
- schools must make sure they only use these practices for the purposes set out at Appendix A.

2.1.4   Planning the use of environmental restraints

In schools, the focus for using restrictive practices is ensuring they are planned appropriately. When planning the use of a recommended environmental restraint, decision-making must be guided by the 6 decision-making principles in the Restrictive Practices Framework (PDF 6 MB).

The planned use of environmental restraint must be:

- student-centred and relevant to the needs and circumstances of the student
- the least restrictive option
- used for the shortest time
- reduced or eliminated, wherever possible
- monitored when in use
- reviewed regularly to ensure they are necessary, effective and are still in line with these 6 principles.

2.1.5   Whole-school planning

It may be necessary for some schools to include the use of some types of environmental restraints in their Work Health and Safety Management Action Plan (DOCX 196 KB), found on the WHS Management Program page. This will support schools to prioritise, plan and implement safety requirements, where environmental restraints are needed, or potentially needed, to maintain the health and safety of the whole school community.

Depending on the health and safety needs of students and staff, this may include using internal fences, gates or locks that are not considered universally safe assets or infrastructure.

Sometimes, it may be appropriate to use an environmental restraint to:

- delineate different areas in the playground
- create separate spaces in the playground
- create an outdoor withdrawal space/time out space
- restrict free access to specific equipment.

Depending on the school, this may be necessary to:

- provide a safe and quiet playground area for students who have differing levels of physical and/or social vulnerabilities
- ensure students can be adequately supported and supervised when using the playground/space
- provide a safe and quiet space for students to de-escalate, as needed
- separate students who unintentionally pose an assessed health and/or safety risk to themselves, other students or staff
- temporarily prevent students from accessing areas in the school, where it is not safe to do so without teacher supervision or for health and safety reasons.

These practices may be necessary to meet the needs of a student or students who are currently enrolled, or who will be enrolled at the school in future. However, schools must engage in an ongoing review process to assess the ongoing need for these practices and ensure less restrictive strategies and interventions are also in place. Schools must ensure these practices and procedures are communicated to parents and carers.

Whole-school planning must be undertaken, in line with the 6 decision-making principles, as well as relevant departmental policies and procedures and staff training.

The use of whole-school restrictive practices must also be included in planning for individual students to ensure it is student-centred, and safely and effectively meets their individual needs. Consultation and parent and/or carer consent is also required, in line with the guidance for planning in sections 2.3 and 2.4.5 in the Restrictive Practices Planning Procedures (PDF 275 KB).

3 Process to plan and use environmental restraints

Below is an overview of the process for determining the need for an environmental restraint on school premises and authorising the use of that environmental restraint, if required. All steps in this process must be completed and clearly documented in a timely manner and filed with other documentation relating to the student.

This includes:

- reviewing pre-enrolment information included in a student's access request (if relevant)
- planning and developing risk assessments around the individual needs and behaviour of the student or as part of a whole school Work Health and Safety Management Action Plan (DOCX 196 KB)
- working with Delivery Support team and Asset Management to identify alternative, less restrictive practices
- considering the implications of an environmental restraint for the student, other students and staff
- ensuring appropriate consultation with parents and/or carers throughout the process of determining the restraint and obtaining consent, or consulting with the Project Reference Group, for new builds
- seeking authorisation for modifying or installing a new environmental restraint, if required, from the Executive Director, School Performance, if the restraint meets the threshold set out in section 3.1.4.

Where an environmental restraint is being requested to meet the needs of an individual student, schools must complete all relevant requirements outlined in the Restrictive Practices Planning Checklist (PDF 2000 KB), to ensure that the use of environmental restraints is informed, ensures duty of care, and upholds the rights of the individual student.

Where a school is requesting the use of a new or modified environmental restraint as part of their whole school Work Health and Safety Management Action Plan, they must complete the appropriate section of the Restrictive Practices Planning Checklist.

3.1.1 Planning to use existing environmental restraints

Sometimes, a school may have existing environmental restraints, including internal fences, gates or locks, that could be used to meet the needs of an individual student or group of students. In these cases, schools must undertake appropriate planning, using the Restrictive Practices Planning Checklist (PDF 2000 KB).

The use of existing environmental restraints does not require authorisation from the Executive Director, School Performance. However, schools must ensure the use of the environmental restraint is the least restrictive strategy to meeting the students' needs and that its ongoing use is reviewed, to determine whether its use could be reduced or eliminated over time.

3.1.2 Planning to modify or install new environmental restraints

Different levels of fenced environmental restraints require different levels of authorisation. These requirements also apply to new builds.

Schools must seek authorisation from the Executive Director, School Performance, if the proposed restraint meets the threshold for fences, barriers and locks, set out in section 3.1.4. This is because the use of these restraints goes beyond the standard design elements used in all school buildings, which are used to meet the security, health and safety needs of the whole school community. In these cases, schools must use the Restrictive Practices Planning Checklist (PDF 2000 KB), to support them to plan, in line with the 6 decision-making principles.

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3.1.3 School-based decisions

Schools should make local decisions where no fencing is required and/or furniture and/or barriers are being used to meet the student's needs.

3.1.4 Decision requiring authorisation from Executive Director, School Performance

3.1.4.1 Fences and barriers

Schools must seek authorisation for infrastructure responses such as moveable fencing and static fencing. This includes log seating/edging, screening with planting and bow top steel fencing.

For new schools, plans should clearly indicate the proposed fences and locks and their location to ensure transparency in what an approval is being requested for.

3.1.4.2 Locking mechanisms

Schools must seek authorisation for additional locking mechanisms or internal latches, such as barrel locks, beyond what is already installed as part of the standard design in all NSW public schools, including schools for specific purposes and support classes in mainstream schools.

Keyed locks on the outside for locking at the end of the day for security and a latch on the inside, which is required for security lockdown procedures, are considered universally safe and can remain. The single action means when you push down on the handle, the latch, even if its closed, trips open so anyone can leave easily in an emergency. This includes locks on screen doors.

Swipe card or key pin access systems on internal doors are also considered an environmental restraint. These systems must only be used as a last resort, after less restrictive approaches have been tried. Modifying or installing these systems also requires authorisation from the Executive Director, School Performance. Wherever these systems are used on the outside of a door, there must always be free exit from the inside. These systems also need to have an override option for commissioning and decommissioning, to ensure use can be discontinued if it is no longer needed.

3.1.5 Relevant documentation to support requests for new or modified environmental restraints

All requests for new or modified infrastructure, must be supported by the following documentation:

- Form A – Request for Infrastructure and Modification or Assessment
- Restrictive Practices Planning Checklist (PDF 2000 KB)
- evidence recording that the use of the restrictive practice has been planned, consulted and consented to (where relevant)
- photographs of the site.

Relevant documentation may include:

- risk assessments
- individual learning support or behaviour support plans
- whole school Work Health and Safety Management Action Plan (DOCX 196 KB).

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4 Roles and responsibilities for planning and authorisation

4.1.1 Principal and school-based Learning and Support team

If less restrictive strategies have been considered or tried and it is identified that an environmental restraint may be required to meet the student's or student need, schools should begin the planning process for environmental restraints.

Principals and school learning support teams must:

- assess the form, function and context of the behaviour assessment or complete a risk assessment to identify risk mitigation strategies. Seek advice from Delivery Support or Health, Safety and Staff Wellbeing where required
- document the less restrictive strategies that were considered or tried to meet the needs of the student or students and respond to the risk of harm. This could be included in an individual student support plan or whole school Work Health and Safety Management Action Plan (DOCX 196 KB). For new schools, this should be documented as part of the design process
- obtain consent from parents and/or carers if environmental restraint is identified as a possible strategy to meet student's needs
- consult with Delivery Support and Asset Management for advice on strategies and to determine whether the proposed restraint meets the threshold for requiring authorisation, as outlined in section 3.1.4
- complete Form A – Request for Infrastructure and Modification of Assessment, if the infrastructure solution identified requires modifying or installing assets or infrastructure and meets the threshold for authorisation
- consult with the parents and/or carers of other students impacted, if necessary, in line with procedures in the Restrictive Practices Planning Checklist (PDF 2000 KB) and the guidance set out in section 2.1.2
- document that the use of restrictive practices has been planned, consulted and consented to. The requirements for what must be documented are outlined in section 2.4.5 of the Restrictive Practices Planning Procedures (PDF 275 KB)
- complete all requirements outlined in the Restrictive Practices Planning Checklist
- provide all relevant documentation to the Learning and Wellbeing Officer for consideration, including:
  - Form A – Request for Infrastructure and Modification or Assessment
  - Restrictive Practices Planning Checklist (PDF 2000 KB)
  - evidence recording that the use of the restrictive practice has been planned, consulted and consented to
  - photographs of the site.

4.1.2 Asset Management

Asset Management should:

- during the planning process for environmental restraints, support the school to consider the least restrictive or alternative infrastructure solutions
- ensure the identified asset or infrastructure meets building code and compliance requirements, for example, does not create an egress risk
- include a recommendation in Form A – Request for Infrastructure and Modification or Assessment, if the infrastructure solution identified requires modifying or installing assets or infrastructure and meets the threshold for authorisation
- contact the school to progress work, once the request is authorised by Executive Director, School Performance.

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4.1.3 School Infrastructure

For new school builds, School Infrastructure should:

- support the school during the planning process and document the consideration of less restrictive or alternative infrastructure solutions
- support schools to identify where potential environmental restraints have been requested or included in the design
- ensure relevant external consultants review the potential environmental restraint to ensure it meets building code and compliance requirements and, for example, does not create a new egress risk
- include a recommendation in Form A – Request for Infrastructure and Modification or Assessment, if the infrastructure solution identified requires modifying or installing assets or infrastructure and meets the threshold for authorisation, as outlined in section 3.1.4
- provide architectural documentation that clearly identifies the requested environmental restraint/s, to support consideration of the recommendation.

4.1.4 Assistant Principal Learning and Support/Learning and Wellbeing Officer

The Assistant Principal, Learning and Support or the Learning and Wellbeing Officer should support the school, where necessary, to:

- assess the form, function and context of the behaviour assessment to identify risk mitigation strategies
- determine that consent from the students' parents and/or carers has been obtained to plan the use of an environmental restraint
- implement positive behaviour support interventions and strategies
- consider reasonable adjustments that can be made to meet the students' needs, including the proposed use of an environmental restraint
- identify the proposed environmental restraint, what action is specifically involved, and what potential triggers or risks are
- complete Form A – Request for Infrastructure and Modification or Assessment, if the infrastructure solution identified requires modifying or installing assets or infrastructure and meets the threshold for authorisation, as outlined in section 3.1.4
- Complete the Restrictive Practices Planning Checklist (PDF 2000 KB).

4.1.5 Learning and Wellbeing Coordinator, Delivery Support

The Learning and Wellbeing Coordinator should:

- when supporting Aboriginal students, also consult with the Aboriginal Education and Wellbeing Officer
- review the items provided by the Assistant Principal, Learning and Support or Learning and Wellbeing Officer
- complete the relevant section on Form A – Request for Infrastructure and Modification or Assessment, to record recommendation to be considered by the Director, Educational Leadership to

  - **support** the request for the use of an environmental restraint and/or modification/installation of infrastructure
  - **not support** the request for the use of an environmental restraint and/or modification/installation of infrastructure and request the Director, Educational Leadership engage with the school on alternative strategies

- Save Form A and the relevant documentation in TRIM before progressing to the Director, Educational Leadership.

4.1.6   Director, Educational Leadership

The Director, Educational Leadership should:

- support the school throughout the planning process, where necessary
- ensure the Learning and Wellbeing Coordinator has:

    - completed the relevant section in Form A – Request for Infrastructure and Modification or Assessment, to outline their recommendation, supporting or not supporting the request
    - reviewed the Restrictive Practices Planning Checklist (PDF 2000 KB)
    - reviewed all associated documentation to comply with requirements under the Restrictive Practices Planning Checklist

- If not, return Form A, and relevant documents to the Learning and Wellbeing Coordinator for further action
- review the recommendation made by the Learning and Wellbeing Coordinator and complete relevant section in Form A, to

    - **endorse** the request for the use of an environmental restraint and/or modification/installation of infrastructure if all requirements under the Restrictive Practices Planning Checklist have been fulfilled
    - **not endorse** the request for the use of an environmental restraint and/or modification/installation of infrastructure and engage with the school on alternative strategies.

4.1.7   The Executive Director, School Performance

The Executive Director, School Performance should:

- ensure the Learning and Wellbeing Coordinator and Director, Educational Leadership, have completed the relevant sections in Form A – Request for Infrastructure and Modification or Assessment, and made a recommendation
- ensure the request is supported by a completed the Restrictive Practices Planning Checklist (PDF 2000 KB) and relevant documentation
- review the recommendation made by the Learning and Wellbeing Coordinator, and endorsed by the Director, Educational Leadership and:

    - **authorise** the request for the use and/or modification/installation of an environmental restraint, if supported
    - **not authorise** if the request is not considered an appropriate use of environmental restraint or does not meet the requirements in the Restrictive Practices Planning Checklist. Refer request to Director, Educational Leadership, to engage with the school on alternative strategies.

- if authorised, submit Form A to Asset Management for action.

5 Reviewing, modifying and removing environmental restraints

5.1.1 Reviewing infrastructure to identify potential environmental restraints

An ongoing focus on monitoring and reviewing the need for environmental restraints will help schools identify where environmental restraints are needed, or where their use can be reduced and eliminated.

Schools know the needs of their students and staff best. In many cases, environmental restraints will be in place to meet the health, safety and wellbeing needs of a student or group of students. However, it is important that the use of these restraints is appropriate and planned in line with the 6 decision-making principles.

Schools need to make sure there aren't any rooms or areas in the school where students could potentially be prevented from exiting by a door that doesn't unlock from the inside, a fence that doesn't have gate or a gate that has a lock. Rooms or areas that have a lockable door or gate could potentially result in the seclusion of a student, as well as presenting a risk to safety in an emergency. This includes small fenced off areas off classrooms or fenced areas between buildings.

Indoor and outdoor rooms and spaces that should be considered include, but are not limited to, the following.

Indoor spaces:

- classrooms
- storerooms
- sports facilities
- toilets/shower rooms
- drawers
- sensory or withdrawal spaces
- cupboards
- canteens
- offices
- service, maintenance, mechanical or electrical areas.

Outdoor spaces:

- sports facilities
- chicken coops
- service, maintenance or electrical areas
- gardens
- playgrounds, including enclosed cricket nets, pool fencing and enclosed basketball courts.

> **Note** – windows are not considered an environmental restraint because they are not designed to be entry or exit points.

In reviewing all locks on doors and cupboards, schools should identify whether there are:

- any rooms or spaces in the school that have external door locks that can't be opened from the inside of the door, including in classrooms, storerooms or cupboards
- any doors that have additional locking mechanisms, such as a sliding door latch lock that students cannot reach.

In reviewing internal fences and lockable gates, schools should consider whether there are any areas in the school where a fence or barrier prevents, or could potentially prevent, a student from exiting the area freely.

Schools can use the optional Environmental restraint self-assessment toolkit (PDF 1398 KB), to help them review the use of environmental restraints in their school. Where schools identify environmental restraints that are necessary to meet an individual student's health, safety and/or wellbeing needs, schools need to ensure that the use of these practices have been planned, in line with the Restrictive Practices Planning Checklist (PDF 2000 KB).

5.1.2 Modifying or removing inappropriate or unnecessary environmental restraints

Sometimes a school may identify an environmental restraint that is inappropriate or unnecessary. This may be because the environmental restraint is:

- no longer needed to meet the needs of a student or group of students
- more restrictive than necessary to keep a student or group of students safe
- creating a health or safety risk, for example blocking a fire exit (section 5.1.3).

Where a school has identified an inappropriate or unnecessary environmental restraint, they should:

- consider if the environmental restraint could be used in a less restrictive way
- consider whether modifying or removing the environmental restraint will create a health and/or safety risk
- prioritise the modification, wherever possible, rather than removal
- remove the environmental restraint if it has no purpose.

Principals should make local decisions that apply to the schools' individual context. Schools must contact their Asset Management Officer and Health and Safety Advisor for advice if they are unable to modify an asset or infrastructure locally, or if the asset or infrastructure needs to be removed.

5.1.3 Health and safety risks and duty of care

Sometimes schools will identify that infrastructure has been installed that not only has the potential to seclude a student in an area, but has also created a health and/or safety risk, such as preventing access to emergency exits.

In the first instance, schools should assess whether any modifications can be made to the infrastructure or asset so that it no longer restricts free exit. However, if they are unable to make local modifications, they must notify their local Asset Services Officer and Work Health and Safety Advisor.

Schools must ensure a safe working and learning environment for everyone, in line with the Work Health and Safety (WHS) policy, and make sure they take precautions to minimise the risk of the environmental restraint being used inappropriately or unnecessarily, until the infrastructure is modified or removed. Taking positive and proactive steps to reduce the risk ensures that principals have met their duty of care obligations and will not be personally liable in respect of any incidents or injuries related to the identified risk.

Interim risk mitigation strategies that could be used to reduce the risk of a student being potentially secluded or inappropriately or unnecessarily restricted may include:

- removing latches or additional locking mechanisms on doors, including locks on screen doors and locks that students cannot reach
- installing a 'hold open device' on gates so they can be latched open during school hours, as needed
- using signage to provide information on when a door or gate should be unlocked or left open, and the circumstances in which it can be closed, such as an emergency.

Appendix A – Universally safe assets and infrastructure

Table 1 Safe use of universally safe assets and infrastructure

Universally safe assets and infrastructure	Safe use
Perimeter fencing around school	• Installed to keep school site secure as part of security strategy. • Located at school boundary.
Fencing used to delineate vehicular and pedestrian areas	• Fencing or barrier used to divide vehicular areas, including roads, carparks and drop-off areas from pedestrian areas within school sites. • Fencing installed as a standard safety measure for all students.
Internal fencing used to divide junior and senior areas in K-12 settings: • Junior – Kindergarten to Year 6 • Senior – Year 7 to Year 12	• Fencing used as a standard health and safety requirement to separate students based on their school stage only.
Internal fencing to delineate after hours shared zones from rest of school	• Installed to keep school site secure as part of security strategy.
Locking mechanisms on cupboards that store: • garden or cleaning equipment • medication • teaching materials/resources • teacher's personal possessions • musical instruments • furniture • sport equipment • sharp objects.	• Provided to safely control access to chemicals, medication or staff personal equipment. • Storerooms or areas used for items or equipment that are not intended for use by students and not considered part of student environment.
Locking mechanisms on gates, doors or fencing to prohibit access to areas for service, maintenance, mechanical or electrical areas including: • communications room • plant areas • equipment rooms • air conditioner units • garbage/waste rooms • fire control rooms or storage • electrical rooms • loading docks.	• Required to provide safe spaces for service, maintenance, mechanical or electrical equipment. • Spaces not considered part of student environment.
Statutory fencing required by the Building Code of Australia or an Australian Standard, for the following reasons: • pool fencing • fences required legally as part of an installation for play equipment • fencing required by the Building Code of Australia as protection from falls (1m or more drop).	• Fencing as a statutory requirement (for example, around a pool, some play equipment or to protect from a fall). • Pool fencing or barrier required to prevent unsupervised access to a pool area, due to legal water safety requirements. • Fencing legally required to stop students from being in the path of moving play equipment. • Fencing required as protection from falling heights of 1m or more.
Locking mechanisms on doors to secure staff or administration areas within a school setting, including: • staff lounge areas • staff study areas • staff administration areas • principal, teacher or staff offices.	• Secure areas required to retain confidentiality of school documentation and safekeeping of staff personal belongings. • Secure areas not proposed for use by students in any circumstance.

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Universally safe assets and infrastructure	Safe use
	• Staff spaces not considered part of the student environment (not allowing access to these areas does not stop access to student items or activities).
Locking mechanisms on doors to interview spaces	• Some secure interview spaces required by the school for use by parents and staff. • Secure interview rooms not proposed for use by students in any circumstance.
Locking mechanisms to Entry Vestibules or School reception areas	• Schools require control of school entrance and reception areas to ensure student and staff safety during visitor interactions. • Schools require mechanism to lockdown if a hostile community member or intruder is present on site.
Locking mechanisms to sanitary facilities and change spaces	• For privacy and safety, locking mechanisms provided on inside of sanitary and change facilities for student use and operation.

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