

Child Safe Environments Policy

Team Conduct

Last updated Thursday, 7 December 2023

Purpose

The protection of children is a shared community responsibility and involves developing stronger communities that are more child-friendly and child-focused to help ensure that all children are safe and protected at all times.

Commitment

We are strongly committed to child safety and establishing and maintaining child safe and child friendly environments. All children who engage our services have a right to be and feel valued, respected, safe, and encouraged to reach their full potential. We are committed to the safety and wellbeing of all children and young people, and this will always be our highest priority. Our commitment to protecting and supporting children and young people is embedded in our business's culture and is at the centre of all that we do.

We are committed to:

- Ensuring that the health, safety and wellbeing of children and young people are protected at all times and at the centre of our values and practices.
- Protecting children and young people from any reasonable, foreseeable risk of injury or harm and creating conditions that both reduce the likelihood of harm and increase the likelihood of identifying harm.
- Supporting the rights of all children to feel and be safe at all times and providing age-appropriate information to our clients about their rights, what harm is, and what to do if they've been harmed.
- Responding to any concerns or disclosures in accordance with the procedures outlined in this policy.
- Taking a preventative, proactive, and participatory approach on child wellbeing and safety issues.
- Valuing and embracing the opinions and views of children and young people.
- Respecting and embracing every child and young person, regardless of their sex, gender, ability, neurotype, faith, or social economic or cultural background.
- Not tolerating bullying and harassment.

Scope and Key Points

1. This policy applies to all workers engaged in Ramsey Speech Pathology. At Ramsey Speech Pathology (“us”, “**provider**”), we are committed to the safety and wellbeing of children and

young people.

2. This policy applies to all activities that involve, result in, or relate to, contact with children and young people, including both physical and online contact.
3. The purpose of this specific policy is to:
 - a. demonstrate our commitment to the safety and wellbeing of children and young people;
 - b. inform others of our commitment and responsibility to ensure the safety and wellbeing; of children and young people, and;
 - c. instil child safety as a priority and a part of our culture across all activities of Ramsey Speech Pathology.
4. Child safety is our paramount concern. Protecting the safety and wellbeing of children and young people is our highest priority. To this end, we have reviewed, accepted, and adopted the:
 - a. National Principles for Child Safe Organisations, published by the Australian Human Rights Commission (the National Principles).
 - b. Child Safe Environments (Child Protection) Policy Directive.
 - c. Children and Young People (Safety) Act 2017.
 - d. Child Safety (Prohibited Persons) Act 2016.
5. The business owner is responsible for:
 - implementing regular review and improvement of this policy;
 - helping others to understand what is required;
 - investigating, managing and responding externally to any feedback, complaints or incidents related in any way to child safety, and;
 - record-keeping, including evidence of current Working with Children Checks and training.
6. To make this Code easier to understand:
 - **“child”**, and **“young person”** means a person younger than 18 years of age;
 - **“clients”** means people to whom we provide services and supports and includes, without limitation, people with disabilities who seek or receive services, products and/or supports from us;
 - **“cultural safety”** means providing quality care that fits with the familiar cultural values and norms of the person accessing the service, that may differ from your own and/or the dominant culture;
 - **“mandatory reporting”** means a legislative requirement imposed on a person or organisation to make a report to a government agency or other organisation in relation to a concern about a child’s safety including, without limitation, concerns around harm or risk of harm;
 - **“provider”** means us;
 - **“workers”** means all workers engaged by us to deliver services and/or supports to clients;
 - we will refer to each of our workers as **“you”** in this document. If you work with or for us, you should assume that this Code applies to **you**; and
 - **“colleagues”** means other workers.

National Principles

The National Principles for Child Safe Organisations provide a national approach to fostering a child safe culture across all sectors of society. They highlight ten core elements that are paramount to creating a child safe organisation and emphasise the importance of actively promoting the safety and wellbeing of children and young people and preventing future harm.

In addition, the National Principles stress the importance of providing culturally responsive and safe environments and practices for Aboriginal and Torres Strait Islander children and young people. This includes recognition of the impact of intergenerational trauma and respecting cultural diversity.

The National Principles are outlined below:

1. Child safety and wellbeing is embedded in organisational leadership, governance, and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them, and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints and concerns are child focused.
7. Staff and volunteers are equipped with the knowledge, skills, and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the national child safe principles is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

Australian Human Rights Commission, 2018.

Communication

This Child Safe Environments policy is provided to every family upon commencing services with us and each time this policy is updated.

It is also available on our website at <https://ramseyspeechpathology.com.au/policies> and to anyone else upon request.

This policy and all related documents are provided to all workers as part of their induction and all workers are expected to agree in writing to accept and act in accordance with this policy at all times. This policy is kept in a shared drive.

We encourage and respect the views of children and young people and involve them in decision-making as appropriate. We also involve parents in how we operate, including encouraging their children to provide feedback, including on our policies and procedures relating to child safety.

We offer several different avenues for parents, children and young people to provide feedback or make a complaint, including anonymously, through a secure online form available on our website at: <https://ramseyspeechpathology.com.au/feedback>.

Feedback is also embedded into our therapy sessions and workers are expected to regularly engage

with clients and parents and provide opportunities for discussion. Clients are encouraged to share their needs and concerns related to their care and therapy services and Alternative-Augmentative Communication (AAC) devices are always available to help empower all children and young people to express themselves.

We also provide clear, age-appropriate information handouts to children during our intake process that include:

- their right to safety;
- what harm is;
- body signals that might indicate to them that they are unsafe;
- what to do if they've been harmed;
- their right to be listened to, and;
- how they can provide feedback or make a complaint if they have a concern to any worker or through their parent/guardian on their behalf.

We will listen to and act upon any complaints or concerns that a child or young person raises with us. We are committed to treating children and young people with respect, listening to their views, and documenting their suggestions, including in relation to their ideas to improve their safety.

Code of Conduct

All workers are required to uphold the values of Ramsey Speech Pathology and agree to and act in accordance with the following Codes of Conduct:

- Ramsey Speech Pathology's Child Safe Environments Policy
- Ramsey Speech Pathology's General Code of Conduct
- The NDIS Code of Conduct
- Speech Pathology Australia's Code of Ethics (2020)
- Speech Pathology Australia's Professional Standards for Speech Pathologists (2020)
- Code of Conduct for Certain Healthcare Workers (2019)

Caring for children and young people brings additional responsibilities for workers engaged with Ramsey Speech Pathology. Workers are responsible for promoting and protecting the safety and wellbeing of children and young people by:

- Adhering to this Child Safe Environments policy at all times and taking all reasonable steps to ensure the safety and protection of children and young people.
- Treating everyone, including those of a different race, ethnicity, sex, gender, sexual orientation, age, social class, ability, neurotype, or faith, with respect, dignity, and honesty to ensure equity is upheld.
- Being aware of and responsive to the particular needs and vulnerabilities of children and young people, e.g., disability, mental health, and trauma, and continuously updating our knowledge and skills in these areas.
- Creating an environment that promotes and enables children's participation and is welcoming, inclusive, culturally safe, and fosters the wellbeing of children and young people.
- Being a positive role model to children and young people in all conduct with them.
- Setting clear boundaries about appropriate behaviour between yourself and children and young people – boundaries help everyone to understand their roles.
- Listening and responding appropriately to the views and concerns of children and young people, particularly if they communicate (verbally or non-verbally) that they do not feel safe or well.

- Being alert to bullying behaviours and responding promptly and appropriately.
- Ensuring that children, young people, and their families know their rights and how to make a complaint.
- Ensuring another adult is always present or in sight during sessions (e.g., parent or guardian).
- Being alert to children and young people who have been harmed, or may be at risk of harm, and reporting this quickly to the Child Abuse Report Line (13 14 78).
- Responding quickly, fairly, and transparently to any complaints made by a young child, young person, or their parent or guardian.
- Encouraging children and young people to 'have a say' on issues that are important to them.

Workers must **not**:

- Engage in rough physical games or take part in any unnecessary physical contact with a child or young person.
- Disclose personal or sensitive information about a child, including images of a child, unless the child and their parent or guardian have provided written consent.
- Use inappropriate language in the presence of children and young people.
- Develop any 'special' relationships with children and young people that could be seen as favouritism, such as the offering of gifts or special treatment.
- Do things of a personal nature that a child or young person can do for themselves, such as toileting or changing clothes.
- Discriminate against any child or young person because of age, gender, cultural background, religion, vulnerability, or sexuality.
- Ignore or disregard any suspected or disclosed child harm or risk of harm.
- Engage in any activity that is unlawful or likely to cause harm to a child or young person.

Any suspected breaches of this child-centered Code of Conduct can be reported as soon as practicable to the business owner either in person, by phone on 0476 799 959, or via email at alice@ramseyspeechpathology.com.au. Breaches or suspected breaches of the Code of Conduct will be taken seriously and dealt with quickly, fairly, and transparently.

Any worker who breaches the Code of Conduct will face disciplinary action and, depending on the severity of the breach, termination of their employment or engagement with Ramsey Speech Pathology. Other actions may include coaching and mentoring of appropriate behaviour with child or young people and additional RRHAN-EC or 'Through Their Eyes' training.

Recruitment

In accordance with the Child Safety (Prohibited Persons) Act 2016, Ramsey Speech Pathology is registered with the Department of Human Services (DHS) Screening Unit, and we link all Working with Children Checks (WWCC). All workers who engage with Ramsey Speech Pathology and will be working in a role with children or young people must hold a current, not prohibited WWCC, issued by the Screening Unit of the DHS. We ensure that each worker's WWCC is renewed every 5 years.

We will immediately contact the Department of Human Services Screening Unit when we become aware of certain information regarding any person involved with Ramsey Speech Pathology, including any serious criminal offence, child protection information, or disciplinary misconduct information.

To ensure we engage the most suitable people to work with children and young people, the following practices will be in place during any recruitment process:

- Making public our commitment to child safety and including this in all job advertisements.
- Providing clear position descriptions that include our commitment to child safety and wellbeing.
- Written resumes and applications from all applicants.
- Face-to-face (either in-person or online) interviews that determine the applicant's knowledge of child safeguarding, such as mandatory reporting, cultural safety, record-keeping, supervision, and information sharing.
- Conducting at least 2 referee checks.
- Ensuring applicants hold the following qualification checks:
 - Responding to Risks of Harm, Abuse and Neglect – Education and Care (RRHAN-EC) certificate and refresher training every 3 years.
 - Safe Environments for Children and Young People – Through Their Eyes certificate.
 - Current, not prohibited WWCC.
 - NDIS Worker Screening Check clearance.
 - Current First Aid/CPR certificate.
 - Catholic Schools Police Clearance.
 - Membership with Speech Pathology Australia (SPA).
 - Completion of relevant degree (Bachelor or Master of Speech Pathology).

All workers will be oriented to Ramsey Speech Pathology's policies and procedures and this Code of Conduct.

Training, Supervision, and Support for Workers

All workers are required to maintain their knowledge regarding child safe environments and participate in training provided by relevant child protection authorities or support agencies.

We will:

- Ensure workers have read and understand the Mandatory notification information booklet, which is available at: https://dhs.sa.gov.au/data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF. This booklet is readily available in our shared drive.
- Hold a valid certificate for both the Responding to Risks of Harm, Abuse and Neglect – Education and Care (RRHAN-EC) training **and** the Safe Environments for Children and Young People – Through Their Eyes training.
 - We require workers to complete both trainings to equip our team with the necessary knowledge and skills to not only protect children and understand mandatory reporting requirements, but also to better understand the lived experience of, and develop stronger relationships and trust with, the children and young people we serve.
 - The RRHAN-EC Fundamentals course must be renewed every 3 years after obtaining a Masterclass certificate.
 - The Through Their Eyes refresher course must be renewed every 3 years.
- Ensure workers understand their responsibility as mandated reporters.
- Provide access to current information about the procedures to be taken in relation to any concerns, disclosures, suspicions, or allegations of harm or risk of harm to children and young people.
- Use resources created by the Australian Human Rights Commission to educate workers about child safe environments and organisations.

Reporting and Responding to Harm or Risk of Harm

We aim to ensure that children and young people are safe from harm and risk of harm. Section 17 of the Safety Act defines 'harm' to mean physical or psychological harm (whether caused by an act or omission), including harm caused by sexual, physical, mental, or emotional abuse, or neglect.

All workers within Ramsey Speech Pathology are mandated notifiers. Mandated notifiers have a legal obligation to notify the Child Abuse Report Line (CARL) on 13 14 78 as soon as practicable if they have a reasonable belief that a child or young person is or may be at risk of harm. If the child or young person is at immediate risk, report to South Australia Police (SAPOL) on 000.

The worker has discretion whether and if so when to notify the family involved that they are making a report. When the suspected harm involves severe physical injury or sexual abuse, the family will generally not be notified before a report is made. In these cases, Ramsey Speech Pathology will be guided by the Department for Child Protection as to if, and when, to notify the family.

We have a right to take action to ensure that children and workers are safe at all times. This may involve contacting SAPOL if any person makes threats against a worker.

In cases involving Aboriginal children and young people, support is provided by Yaiya Tirramangkotti – an Aboriginal team, via the CARL number.

Even if not a mandated reporter, any person can report harm or risk of harm to a child or young person. The individual who identifies the harm or risk of harm is encouraged to make the report to authorities and can request the support from the business owner to do so if requested.

Information about making appropriate reports of harm or risk of harm is available from the South Australian Department of Child Protection website: <https://www.childprotection.sa.gov.au/reporting-child-abuse>.

All adult workers (even if not a mandated notifier) have a legal obligation to report child sexual abuse to the police and to protect a child from sexual abuse. Failure to meet these obligations may be considered a criminal offence.

Following a report being made to CARL or SAPOL, workers must make an internal report to the business owner. We will be guided by the Department for Child Protection and/or SAPOL after a report has been made.

In the event a worker is reported to CARL or SAPOL for causing harm or risk of harm to a child or young person, they will be removed from any role that involves working with any child or young person until authorities have conducted an investigation.

Following a report to CARL or SAPOL, we will continue to support the child or young person by:

- Referring the child, young person, or their family to other appropriate services.
- Continuing to provide therapy services to the child, young person, and their family and monitor their circumstances.

We will document all information received regarding the report, as well as detail of the reported concerns and any action taken, and store this confidentially and securely.

Reporting and Responding to General Complaints or Feedback

Providing opportunities for complaints and feedback ensures that children, young people, and their families feel valued and respected and enables us to improve the quality of our services. Any worker who engages with Ramsey Speech Pathology is trained by us on how to recognise and respond to complaints and feedback as part of their induction.

Children, young people, and their families are informed during intake that they can provide feedback or make a complaint at any time. Compliments, complaints, and feedback can be provided via:

- In-person
- Phone (0476 799 959)
- Email (alice@ramseyspeechpathology.com.au)
- Post (PO Box 260, Torrensville SA 5031)
- Online form through our website: <https://ramseyspeechpathology.com.au/feedback>

Clients and their families also have the option of submitting feedback anonymously (either via post or through our online form). Complaints can also be made by a client's advocate or representative.

We display a poster in our clinic room that informs clients and their families how to make complaints and provide feedback. A brochure with key information is also available on our website, alongside our more comprehensive policies: <https://ramseyspeechpathology.com.au/policies>.

We will manage all complaints and feedback received from children, young people, and their families promptly, sensitively, and fairly. We will:

- Listen to the complaint and/or feedback.
- Make a record of the feedback or complaint if received verbally.
- Advise of the time expected for an outcome (except in cases where feedback or a complaint were submitted anonymously).
- If appropriate, encourage open discussion of concerns with the complainant.
- Respond to the complainant with an outcome within 21 business days.
- Communicate the outcome of investigations to the complainant and ensure that any recommended improvements or changes are implemented effectively.
- Clearly document and securely store decisions and actions taken in response to feedback and complaints.
- Make sure that procedural fairness is followed at all times.

If a worker receives a complaint, they must forward it to the business owner as soon as possible. If the child, young person, or their family is not happy with the outcome from the complaints process, they can contact:

- Speech Pathology Australia – 1300 368 835
- NDIS Quality and Safeguards Commission – 1800 035 544
- Health and Community Services Complaints Commissioner – (08) 8226 8666
- Australian Human Rights Commission – 1300 656 419
- South Australian Equal Opportunities Commission (for complaints related to discrimination) – (08) 8207 1977

Responding to and resolving complaints amicably gives us the opportunity to improve our services and learn from our mistakes. We take complaints and feedback seriously and will work hard to address and resolve issues and concerns efficiently and effectively.

Risk Management

Identified risks for current service provision are identified through ongoing reflection and review. Any newly identified risks to children or young people will be raised with the business owner for assessment, management, and inclusion in this policy.

Identified Risk	Risk Rating	Actions to Mitigate Risk
One-on-one allied health sessions with a child or young person.	High	<ul style="list-style-type: none"> • Speech Pathologist to include parent, guardian, or support person in sessions (including online sessions) unless there is a reason not to do this, as discussed with the business owner, parent/guardian, and child or young person. • If the parent or guardian is not in the room during the session, the Speech Pathologist will ensure visual and/or at least auditory monitoring by the parent or guardian. • We clearly outline in our Terms of Service and Service Agreements (for NDIS participants) the expectation that parents or guardians will be present for sessions, including online sessions. • If a parent or guardian leaves the room during the session for any reason, the door is to be left open.
Video and/or audio recordings taken of a child or young person during allied health sessions (e.g., for the purpose of assessment scoring or speech/language sample analysis).	High	<ul style="list-style-type: none"> • When there is a clinical reason to video or audio record a part of a session involving a child or young person, the Speech Pathologist will do so using their Ramsey Speech Pathology-supplied device only. The video/audio will then be uploaded to our secure online server and deleted from the device. Audio and video recordings are deleted from our server when no longer needed.
Culture of business is not child-safe focused.	Low	<ul style="list-style-type: none"> • Our child-focused Code of Conduct is in place that sets the behavioural standards expected including what happens when a breach occurs. • We have a strong commitment to the safety and wellbeing of children and young people, enshrined in our business's values. • The National Principles for Child Safe Organisations are embedded in this policy. • We meet the requirements of the <i>Children and Young People (Safety) Act 2017</i> (which mandates child safe environments) and the <i>Child Safety (Prohibited Persons) Act 2016</i> (which mandates Working with Children Checks).
Workers don't understand their obligations to report harm and risk of harm to CARL and/or SAPOL.	Low	<ul style="list-style-type: none"> • Workers are trained in both Safe Environments – Through their Eyes and RRHAN-EC (including refresher trainings every 3 years). • Workers must abide by this Child Safe

		Environments Policy and Code of Conduct (latter is signed upon commencement of position with Ramsey Speech Pathology).
Physical contact	Medium	<ul style="list-style-type: none"> • Any physical contact must be appropriate to the delivery of services being provided. • Where physical contact is required, this is undertaken in a safe way by explaining why contact is required and what will happen and asking the child or young person (and/or family if this is more appropriate) for their consent before proceeding. • Unnecessary physical contact is not allowed.
Online communication	Low	<ul style="list-style-type: none"> • Cyber safety and social media guidelines are in place to ensure workers understand their responsibilities. • Communicating with clients or young people via social media is not allowed. • Appropriate supervision is provided for all online activities.
Use of search engines and websites	Low	<ul style="list-style-type: none"> • 'Safe Search' filtering is enabled on all devices for safe web browsing. • All websites, videos, and applications are pre-screened prior to their use in sessions to ensure content is safe and appropriate.
Supervision	High	<ul style="list-style-type: none"> • Children and young people are to be supervised by parents/guardians at all times. • When providing a one-to-one session with a child or young person, it will be in line of sight or another adult, such as their parent/guardian, support person, or another therapist during joint sessions. • Our Terms of Service and Service Agreements (for NDIS participants) clearly outline the following expectations: <ul style="list-style-type: none"> ○ Home visits and Telehealth: A parent or guardian must be present in sessions, or at least home and within visual or auditory range. ○ Clinic sessions: Parents should be present in the session, or at least just outside the room in the waiting area (within visual and auditory range) if this is deemed more appropriate following discussion between the business owner, parent/guardian, and child or young person. ○ Parents and guardians are expected to

		<p>remain on-site at all times during consultations. Any exceptions to this must be discussed with the business owner no later than 24 hours prior to the session and the business owner reserves the right to cancel the session decline services if a parent or guardian is not present.</p>
<p>Taking images of children and young people</p>	<p>Low</p>	<ul style="list-style-type: none"> • Written consent of the child or young person as well as their parent or guardian is required. • Disclosure will be made as to how the image is to be used and consent must be provided to the child, young person, and parent or guardian. • Images must be presented in a way that de-identifies the child or young person.
<p>Privacy and confidentiality</p>	<p>Low</p>	<ul style="list-style-type: none"> • All physical documents containing confidential information will be stored privately in a locked filing cabinet with restricted access. • All digital files containing confidential information is protected electronically by using secure software that meets our obligations under the Australian Privacy Principles. • Access to digital files is restricted to only those requiring it to perform their duties and two-factor authentication is enabled. • Workers must not disclose information regarding any child or young person without written consent of the child, young person, and their parent or guardian. • 'Waiting rooms' and meeting passcodes are utilised for all Telehealth consults to ensure no unauthorised entry to sessions.

Related Policies and Procedures

This policy is to be read with and supplement our:

- General Code of Conduct
- NDIS Code of Conduct
- Ethical Practice and Professional Responsibilities Policy
- Complaints Management Policy
- Incidents Management Policy
- Risk Assessment and Management Policy
- NDIS Worker Screening Policy

Policy Review

We will, at a minimum, review this policy and the related procedures once every 5 years as required by the Children and Young People (Safety) Act 2017. We will also review this policy when:

- New or additional risks are identified for children or young people, which may require a change in this policy or procedures.
- A critical incident where a child or young person has experienced harm through involvement in Ramsey Speech Pathology.
- Concerns are raised by anyone involved in Ramsey Speech Pathology about child safety or welfare in Ramsey Speech Pathology.
- Legislative changes and requirements.

We will lodge a new child safe environments compliance statement with the Department of Human Services each time we review and update this policy.

Policy date: 7 December 2023

Review date: 7 December 2028