

CObH Medical Centre Operations

Child Safe Policy and Code of Conduct

1. Overview and Purpose

This policy was written to demonstrate the strong commitment of CObH Medical Centre Operations to child safety and to establishing and maintaining a child-safe and child-friendly environment.

2. Scope

This policy applies to all employees, volunteers, work placement students and contractors, referred to throughout this policy collectively as 'workers'.

All workers are required to agree in writing to accept and act in accordance with the policy.

3. Commitment to the Safety of Children and Young People

CObH Medical Centre Operations respects children and young people and welcomes them regardless of their abilities, sex, gender or social economic or cultural background and we are committed to providing a safe environment. All children and young people accessing our services or sites will be valued, bullying and harassment will not be tolerated.

This policy complies with our obligations under the Children and Young People (Safety) Act 2017, the Child Safety (Prohibited Persons) Act 2016 and aligns with the National Principles for Child Safe Organisations.

4. Communication

This child safe policy is available on our practices website and our intranet, on request and provided as part of new starter onboarding system. A link is also provided for feedback and complaints on the website.

This child safe policy and related documents are provided to all new workers as part of their induction following recruitment.

We encourage and respect the views of children and young people and involve them in decision making as appropriate. We provide clear age-appropriate or developmentally appropriate explanations to children and young people including their right to safety, their right to be listened to and that they can provide feedback or make a complaint if they have a concern, to any worker or ask their parent/guardian to do this on their behalf. We will listen to and act upon any complaints or concerns that a child or young person raises with us.

5. Code of Conduct

Caring for children and young people brings additional responsibilities workers, all of whom are responsible for promoting and protecting the safety and wellbeing of children and young people by:

- Acting in accordance with the child safe 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 different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs with respect and honesty and ensure equity is upheld
- being a positive role model to children and young people in all conduct with them
- setting clear boundaries and maintaining appropriate behaviours with 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
- being alert to bullying behaviours and responding promptly and appropriately
- ensuring another adult is always present or in sight when conducting one to one consulting, coaching, instruction or other activity
- 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 child, young person or their parent/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
- 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.

Breaches or suspected breaches of the Code of Conduct should be reported as soon as practicable to your immediate manager either in person, by telephone, or via email.

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 up to and including termination of employment.

6. Recruitment

To ensure CObH Medical Centre Operations engages the most suitable people to work with children and young people we have the following recruitment practices in place:

- our commitment to child safety is included in all job advertisements and position descriptions by stating employment is subject to DHS Screenings and National Police Checks and other relevant clearances (eg. NDIS)
- reference checks are conducted
- qualifications are checked.

In accordance with the Child Safety (Prohibited Persons) Act 2016, CObH Medical Centre Operations is registered with the DHS Screening Unit and we link all WWCCs.

All workers must hold a current, not prohibited, WWCC issued by the Screening Unit of the Department of Human Services as a condition of employment. WWCC evidence must be provided prior to employment commencing and be renewed every 5 years as a condition of employment. CObH verifies the accuracy of all WWCCs in the DHS Screening Unit portal as required by law.

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

7. Training, Supervision and Support for Workers

CObH Medical Centre Operations has strategies in place to supervise, train and support workers to understand our organisation's Child Safe Policy, their mandatory reporting obligations, how to build culturally safe environments and their responsibilities to create a child safe and friendly environment. Our strategies include:

- Training:
 - Complete 'Safe Environments Through their Eyes' training as part of induction (unless evidenced by a current certificate) and every 3 years thereafter. Training incorporates mandatory reporting.
- Support:
 - an induction process for all new workers includes a copy of this policy document and ensure mandatory reporting training is completed.
 - General Practitioners are available resources for workers.

8. 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.

Mandated reporters in our organisation are workers who:

- provide services to children and young people

- hold a management position in the organisation the duties of which include direct responsibility for, or direct supervision of, the provision of those services to children and young people.

Mandated reporters have a legal obligation to notify the Child Abuse Report Line (CARL) on 13 14 78 as soon as practicable if they have a suspicion that a child or young person has been harmed 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.

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 another worker to do so if required.

Information about making appropriate reports of harm or risk of harm is available from the South Australian Department for [Child Protection website](#)

All adult workers (even if not a mandated reporter) 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 management..

We will be guided by the Department for Child Protection and/or SAPOL after a report has been made as to whether we can conduct an internal investigation.

If 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 concluded their investigation.

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

- referring the child, young person or their family to other appropriate services
- continuing to provide a service to the child, young person and their family and monitor their circumstances.

We will document all information received regarding the report and store this securely in the CRM.

9. 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 service. Children, young people and their families are provided with information through the Practice Brochure and posters found in the clinic or via the practice website.

Compliments, complaints or feedback received from children, young people or their families can be provided verbally to any worker or direct to COBH Medical Centre Operations or through the Health and Community Services Complaints Commissioner (HCSCC) or the National Medical Registrar board AHPRA.

We will deal with complaints and feedback received promptly, sensitively and fairly. We will:

- listen to the complaint/feedback
- the person receiving the complaint will make a record of it if received verbally
- advise the time expected for an outcome where possible
- if a worker receives a complaint, they must forward it to management as soon as possible
- management will respond to the complainant with an outcome in a timely manner
- clearly document and securely store decisions and actions taken in response to complaints and feedback
- make sure that procedural fairness is followed at all times.

If the child, young person or their family is not happy with the outcome from the complaints process they can contact:

- Health and Community Services Complaints Commissioner
- Australian Health Practitioners Regulation Agency
- Australian Human Rights Commission
- South Australian Equal Opportunities Commission
- Their local Member of Parliament

10. Risk Management:

Identified Risk	Actions to minimise risk
Physical contact	<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/young person for their permission (or their family if this is more appropriate) before proceeding • unnecessary physical contact is not allowed
Online communications	<ul style="list-style-type: none"> • cyber safety and social media guidelines are in place and provided to all workers • appropriate supervision is provided for all online activities • workers must not communicate with children or young people via social media
Transport of children and young people	<ul style="list-style-type: none"> • workers must not transport a child or young person unless specifically approved • parents/guardians must provide consent before transporting a child or young person • worker must have a valid, unrestricted driver's licence • vehicle must be registered, insured and in roadworthy condition • worker must not be alone in a vehicle with a child or young person

Supervision	<ul style="list-style-type: none"> children and young people may be supervised by parents/guardians/workers depending on clinical assessment/needs/service being accessed
Taking images of children and young people	<ul style="list-style-type: none"> consent of child young person and their parent/guardian required disclosure will be made as to how the image is to be used and consent must be provided by the child, young person and parent/guardian
Physical environment	<ul style="list-style-type: none"> maintain a risk register that is reviewed annually to ensure effectiveness conduct risk assessments for all activities ensure all equipment is in good working order
Privacy and confidentiality	<ul style="list-style-type: none"> all documents containing confidential information are stored electronically in a CRM with restricted access digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties workers must not disclose information regarding any child or young person without written consent of the child, young person and their parent/guardian unless there are child safety concerns
Off-site activities	<ul style="list-style-type: none"> consent of parent or guardian is sought where appropriate to the service children and young people will not be left under the supervision of unauthorised persons children and young people have the right to contact their parents, or another adult, if they feel unsafe, uncomfortable, or distressed

11. Related Policies and Procedures

- Client Information Brochure
- Child Safe Environments training – (Through Their Eyes)
- Mandatory Reporting Information Booklet – Human Services
https://dhs.sa.gov.au/data/assets/pdf_file/0004/166756/CSE-Mandatory-reporting-information-book.PDF

Reference Documents	Source
Children and Young People (Safety) Act 2017 (SA)	Government of South Australia https://www.legislation.sa.gov.au/
National Principles for Child-Safe Organisations	Australian Human Rights Commission https://childsafef.humanrights.gov.au/
Information Sharing Guidelines	Department of Premier & Cabinet https://www.dpc.sa.gov.au/
Child Safety (Prohibited Persons) Act 2016	Government of South Australia https://www.legislation.sa.gov.au/

12. Policy Custodian

Policies and associated documents are managed by delegated authorities within the organisation and can only be reviewed and changed by that position (and not an individual).

This document is managed by: Practice Manager, CObH Medical Operations

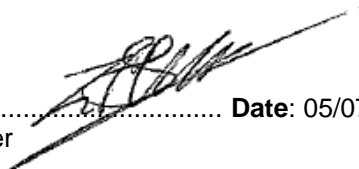
13. Approval and Review

CObH Medical Operations 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, or when:

- new or added risks are identified for children or young people, which may require a change in the policy or procedures
- a critical incident where a child or young person has experienced harm through involvement in the organisation
- concerns are raised by anyone involved in your organisation about child safety or welfare in the organisation
- awareness or compliance to the child safe policy and/or procedures is low
- legislative changes/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.

This policy is approved by the Chief Executive Officer and is in force until rescinded or altered by this authority, who must approve any revisions unless otherwise delegated.

.....  **Date:** 05/07/2024
Approved by: Chief Executive Officer

14. Revision Record

Date	Version	Revision Description
05/07/2024	1.0	First Version

Policy Acknowledgment

I, the undersigned, acknowledge that I have received, read, and understood the Child Safe Policy and Code of Conduct. I agree to comply with the guidelines and procedures outlined in the policy. I understand that failure to adhere to the policy may result in disciplinary action, up to and including termination of employment or contractual agreement.

Employee/Participant Signature: _____

Name: _____ Date: _____