

Service Standards

2.9 Child Safe Policy

2.9.1 Policy Connections

National Principles for Child Safe Organisations, Australian Human Rights Commission 2019; NDIS Quality and Safeguards Commission, NDIS Practice Standards and Quality Indicators, Version 4, November 2021- 1 Rights and Responsibilities; Aged Care Quality and Safety Commission Aged Care Quality Standards 2019 – 8 Organisational Governance; Disability Services Act 1986 (Commonwealth), Disability Discrimination Act 1992 (Commonwealth), Guardianship and Administration Act 1990 (WA), Children and Community Services Act 2004 (WA); Children, Young Persons and Their Families Act 1997 (Tas.).

2.9.2 Purpose

This policy demonstrates EverAbility's strong commitment to child safety and its policies and practices towards keeping children and young people safe, including from harm, abuse, neglect and grooming.

It provides the key elements of a child safe organisation and the framework for:

- the implementation of the National Principles for Child Safe Organisations
- the development of work systems, practices, policies and procedures that promote child protection, safety and wellbeing within EverAbility
- the creation of a safe and supportive environment and a positive and robust child safe culture
- the promotion and open discussion of child safety issues within EverAbility and
- compliance with all laws, regulations and standards relevant to child protection and child safety in Western Australia and Tasmania

2.9.3 Statement of Commitment to Child Safety

All children and young people who come to EverAbility have a right to feel and be safe. We are committed to providing a child safe and child friendly environment, where children and young people are safe and feel safe and are able to actively participate in decisions that affect their lives.

EverAbility will not tolerate harm, abuse, neglect and grooming, and are committed to acting in the best interests of children and young people, and keeping them safe from harm.

As a child safe organisation, EverAbility will create conditions that will:

- reduce the likelihood of harm to children and young people;
- increase the likelihood of identifying harm;
- be responsive to concerns, suspicions, allegations and disclosures; and
- enable children and young people to provide feedback or make a complaint relating to their experiences at EverAbility.

EverAbility's Statement of Commitment to Child Safety has been designed to reflect the National Principles for Child Safe Organisations.

2.9.4 Scope

This Child Safe Policy applies to all activities in the organisation that involve direct contact with children.

This Policy applies to all people that work for the organisation in a paid or unpaid capacity, parents/carers and other family members.

All areas of the organisation include but not limited to;

- Therapy services
- Volunteer services
- Online services e.g. Telehealth
- Administrative and Corporate services

2.9.5 Child Safe Environment

EverAbility is committed to the effective implementation of work systems, practices, and policies to promote a child safe environment.

A **risk management approach** is used to identify key risk indicators and assess child safety risks based on a range of factors, including the nature of the activities, physical and online environments and the characteristics of EverAbility's clients.

EverAbility's work systems, practices, and policies to promote a child safe environment include:

- a Child Safe Code of Conduct
- clear information as to what constitutes harm, abuse, neglect and grooming and associated key indicators of harm, abuse, neglect and grooming
- clear procedures for responding to and reporting child safety incidents or concerns internally, and for responding incidents or allegations of harm, abuse, neglect and grooming
- strategies to support, encourage and enable Workers, Contractors, External Education Providers, parents/carers and children and young people to understand, identify, discuss and report child safety matters
- robust procedures for recruiting and screening of Workers
- procedures for reporting to external agencies, including Mandatory Reporting and Reporting to Police
- strategies designed to empower children and young people and keep them safe
- strategies to support and encourage the participation and inclusion of Aboriginal and Torres Strait Islander children and young people, individuals from culturally and/or linguistically diverse backgrounds and children and young people with disability
- child safe training including induction and refresher training available at no cost on [Child Safe Organisation e-learning modules](#)
- supervision of Workers and Contractors that have direct contact with children and young people to ensure compliance with EverAbility's approach to child safety

- information regarding the steps to take after a disclosure of harm, abuse, neglect and grooming to protect, support and assist children and young people
- guidelines with respect to record keeping and confidentiality
- policies to ensure compliance with all relevant laws, regulations and standards
- (including the National Principles for Child Safe Organisations)
- a system for continuous review and improvement.

2.9.6 Rights, Diversity and Involvement

2.9.6.1 Children and Young People's Rights to Safety, Information and Participation

EverAbility is a child safe and child-centred organisation, its environment is friendly and welcoming to all children and young people.

EverAbility ensures children and young people know about their rights to safety, information about what they can do if they feel unsafe and values participation by being actively involved in decisions that affect them.

2.9.6.2 Valuing Diversity at EverAbility

EverAbility values diversity and does not tolerate any discriminatory practices. To achieve this, it:

- welcomes children and young people with disability and their families and act to promote their participation
- supports the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander children and young people and their families
- supports the cultural safety, participation and empowerment of children and young people from culturally and/or linguistically diverse backgrounds and their families
- supports children and young people and families of diverse sexuality and act to promote their participation

- seeks to recruit a workforce that reflects a diversity of cultures, abilities and identities
- children and young people who have a disability and/or identify as LGBTQIA+ may be more vulnerable to harm and therefore adopt specific strategies to ensure their safeguarding and wellbeing
- commits to ensuring its facilities promote the inclusion of children and young people of all abilities.

2.9.6.3 Parents/Carers, Families and Community Involvement at EverAbility

EverAbility recognises that parents and carers have the primary responsibility for the upbringing and development of their children. We ensure they participate in decisions affecting their children.

We ensure families and relevant communities know about EverAbility's operations and policies, including its Child Safe Policy and Child Safe Code of Conduct, record keeping practices, risk management, and complaints and investigation processes.

We build cultural safety at EverAbility through partnerships with relevant communities.

2.9.7 Reporting Child Safety Incidents or Concerns to the Organisation

EverAbility provides procedural guidance for Board members, Workers and Contractors about how to identify key indicators of harm, abuse, neglect and grooming and how to report child safety incidents or concerns internally and to relevant external authorities.

Children and Young People are provided with information about and encouraged to use multiple pathways to raise child safety incidents or concerns about EverAbility. These include informal, formal and 'anonymous' ways, and through external child advocacy or child safety organisations.

Parents/carers, family members and other community members who have child safety concerns or who suspect that a child or young person associated with EverAbility may be subject to harm, abuse, neglect and grooming can contact the CEO, or if the concern relates to the CEO, the Board Chair.

Any person can contact the CEO or the Board Chair with concerns about EverAbility's child safety leadership. Communications will be treated confidentially on a "need to know basis".

Whenever there are concerns that a child or young person is in immediate danger the Police should be called on 000.

2.9.8 Responsibilities

Child Safety is everyone's responsibility. All adults connected with EverAbility, have a shared responsibility for contributing to the safety and protection of children and young people. Specific responsibilities include:

2.9.8.1 EverAbility's Child Safe Officers

Child Safe Officers include A representative of Disability Employment Services (DES), Program Managers, Team Leaders, Social Workers and Psychologists working within EverAbility's Child and Youth services. They may receive additional training about child safety and protection issues and contacts for raising child safety concerns within the Organisation.

2.9.8.2 The Board

The Board is responsible for approving the Child Safe Program and ensuring the Organisation has appropriate resources to effectively implement the National Principles for Child Safe Organisations.

2.9.8.3 The CEO

The CEO is responsible, and will be accountable for the Child Safe Program. The CEO will take practical measures to ensure the Child Safe Policy and related practices are implemented effectively and that a strong and sustainable child safe culture is maintained within EverAbility.

2.9.8.4 The Executive Team

Each Executive Team member will ensure the provision of appropriate resources within their area of operations for the effective implementation of the Child Safe Program and support the CEO in the practical application of the Organisation's Child Safe strategies, policies, procedures and work systems.

2.9.8.5 Workers

All Workers are required to comply with the Child Safe Policy and Child Safe Codes of Conduct, be familiar with the Child Safe Program and understand their legal obligations to report harm, abuse, neglect and grooming. Workers include staff and volunteers at EverAbility.

Workers that have direct contact with children, are required to comply with additional requirements to maintain working with children's checks (WA) or vulnerable people registration (TAS).

Each individual must be aware of key indicators of harm, abuse, neglect and grooming, be observant and raise all child safety incidents and concerns with an EverAbility Child Safe Officer.

2.9.8.6 Contractors

All Contractors engaged by EverAbility are responsible for contributing to the safety and protection of children and young people who receive services from EverAbility and must comply with the Child Safe Policy and Child Safe Code of Conduct.

Contractors must understand their legal obligations to report harm, abuse, neglect and grooming. EverAbility may include this requirement in written agreements with its Contractors.

Contractors include, for example:

- maintenance and building personnel
- cleaners
- consultants
- casual workers
- individuals with an agreement to use EverAbility's facilities.

2.9.8.7 External Service Providers

External Service Providers, engaged to deliver a specified program or activity to its child and youth clients on EverAbility's premises, must contribute to the safety and protection of children and young people in all environments and comply with the Child Safe Policy and Child Safe Code of Conduct.

EverAbility may include this requirement in written agreements with its External Service Providers.

2.9.9 Child Safe Risk Management

EverAbility recognises the importance of a risk management approach to minimise the potential occurrence of child abuse or harm and uses this information to inform its policies, procedures and activity planning.

EverAbility has developed a Child Safe Risk Register to help identify, assess and manage child safety risks. It outlines how EverAbility meets the National Principles for Child Safe Organisations, and where further action is required.

2.9.10 Child Safe Human Resources Management

EverAbility applies best practice standards when recruiting and screening Workers and Contractors. Its procedures ensure all reasonable steps are taken to engage the most suitable and appropriate people to work with children and young people. All eligible Workers that provide direct contact with children must maintain a valid Working with Children Check (Western Australia) or Registration to Work with Vulnerable People Check (Tasmania).

EverAbility ensures that the Executive Team, Workers, and Contractors who have direct contact with children and young people undergo Child Safe induction, and ongoing education and training as part of its child safeguarding commitment.

Workers and Contractors, while directly engaging with children and young people, are subject to supervision and performance monitoring.

- EverAbility ensures that professional development programs for Workers include the access to Child Safe education and training programs available at [Child Safe Organisation e-learning modules](#)

2.9.11 Record Keeping

EverAbility maintains child safe records in accordance with its risk management, incident reporting and record keeping policies and procedures. All records are managed in compliance with privacy legislation requirements; they are kept securely and accessed as-needed by authorised persons only. Incident data is shared with

relevant workers and committees in de-identified format for the purpose of analysis and the identification and implementation of systemic quality improvement purposes.

2.9.12 Policy and Program Review

EverAbility is committed to the continuous improvement of its Child Safe Program, which is regularly reviewed for overall effectiveness and compliance with all child protection and child safety related laws, regulations and standards.

EverAbility is committed to actively seeking, actioning, and incorporating into this Policy, feedback from children and young people, families, the wider community, Workers and Contractors, and will communicate any adjustments or amendments widely.

2.9.13 Child Safe Policy Non-Compliance

EverAbility enforces its Child Safe Policy and Child Safe Codes of Conduct. In the event of any non-compliance, it will instigate a review that may result in a range of measures including (depending on the severity of the breach):

- remedial education
- counselling
- increased supervision
- the restriction of duties
- suspension
- in the case of serious breaches, termination of employment, contract or engagement.

2.9.14 Useful Resources

The National Principles for Child Safe Organisations (National Principles) were developed by the Australian Human Rights Commission in response to recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse. They are available online via the following link: [National Principles for Child Safe Organisations](#).

2.9.15 Glossary of Key Terms

Child/Children	In accordance with the United Nations Convention on the Rights of the Child, 'child' means every human being under the age of 18. For the purposes of this Policy, a child is a person under the age of 18.
Child abuse	Includes sexual abuse, physical abuse or violence, serious psychological or emotional abuse and serious neglect.
Child Safety Officer/Team	A member of staff designated with responsibility for receiving and recording reports of child abuse concerns from workers and notifying relevant staff/external bodies.
Child Safety Program	Includes all aspects of the implementation of the child safe organisation framework and the 10 national principles. This includes but not limited to the child safety policy, child safe code of conduct, child safe risk management, training, HR, child safe procedures and processes to create a safe environment for children.
Direct Contact	Physical contact, face-to-face contact, contact by post or other written communication, contact by telephone or other oral communication, or contact by email or other electronic communication
Grooming	Grooming is the lead up to conducting acts of sexual abuse. Grooming behaviour involves the perpetrator manipulating a child to gain their trust, build rapport, and exert their power over them. Western Australia and Tasmania classify grooming as a serious offence and is punishable by law.

Harm	Harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing caused by physical, psychological or emotional abuse or neglect, or sexual abuse or exploitation. Harm can be caused by a single act, omission or circumstance; or a series or combination of acts, omissions or circumstances.
Neglect	Neglect in relation to a child includes failure to provide an adequate standard of nutrition, medical care, clothing, shelter or supervision to the extent where their health or development is significantly impaired or placed at serious risk.
Physical abuse	Consists of any non-accidental form of injury or serious physical harm inflicted on a child. It may result from physical punishment or physically aggressive treatment and/or neglect that exposes a child to physical injury or significant harm. Physically abusive behaviour includes: shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning.
Psychological/emotional abuse	Refers to a parent or guardian/caregiver's inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate nonphysical nurture and emotional availability. It also includes hostility, derogatory remarks or persistent coldness from a person, to the extent where the child is disturbed or their emotional development is at serious risk of being impaired.
Sexual abuse	A child is sexually abused when any person uses authority or power over a child to engage in sexual activity. It includes sexual offences and involves a wide range of sexual activity, including exposure to pornography.
Volunteer	A person who is acting on a voluntary basis for EverAbility (irrespective if the person receives out of pocket expenses).

Working with Children Check	A WWC Check is required by a person if they engage in certain paid or unpaid work with children, described as 'child-related work' under the WWC Act in Western Australia
Worker	EverAbility staff, inclusive of therapy, administration, corporate and volunteers.
Vulnerable People Registration	Registration to work with vulnerable people in Tasmania (inclusive of children).

Policy Management and Review History

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Approver	Board
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Review History