

1.0 POLICY PURPOSE AND SCOPE

Aspiring futures SA recognises the child's right to feel safe and to live in an environment that protects from assault, neglect, exploitation or any other form of harm or risk of harm. This policy specifically looks at the requirements when working with children under eighteen (18) years. This policy has been designed to meet the requirements of the Children & Young People (Safety) Act 2017 the Child Safety (Prohibited Persons) Act 2016 and the National Principles for Child Safe Organisations to create a safe environment for children and young people.

Director is responsible for:

- Ensuring all staff are trained, understand and sign that they have read and understood this policy and the Code of Conduct
- Actively seek input and give children and young people, families, staff and relevant others a voice in this policy and our practices through:
 - Seeking feedback during support provision
 - Face-to-face meetings
 - Annual surveys
 - Feedback and complaints process
 - Annual staff performance reviews
- Ensure and confirm that all staff working with children hold the relevant Working with Children Check and NDIS Screening Check
- Review this policy at least every two years and lodge a new child safe environment compliance statement after it has been endorsed
- Monitor and manage the currency of all screening and compliance checks
- Ensure that contractors hold current WWCC/NDIS checks and agree to our policy and Code of Conduct
- Ensure all children and young people have a support plan designed to suit their requirements
- Risk assessment and management strategies are undertaken and reviewed
- Supply a copy of this policy upon request

Management, staff and volunteers are required to:

- Read, understand, seek clarification (as required) and agree to this policy and the Code of Conduct
- Hold current checks – Working with Children and NDIS Screening
- Comply with their position descriptions
- Following all policies and procedures
- Provide feedback on policies and practices
- Report all risks or potential harm and risk of harm to children and young people immediately to the Child Abuse Report Line
- Communicate any complaints and incident information to management
- Always comply with National Principles for Child Safe Organisations and all state legislative requirements

Contractors are required to:

- Read, understand, seek clarification (as required) and agree to this policy and the Code of Conduct
- Hold and provide copies of current checks – Working with Children and NDIS Screening
 - Verify NDIS Screening (see NDIS Worker Screening and Risk Assessed Role Policy)
 - Verify the worker’s Working with Children Check in the DHS Screening Portal
- Comply with their contract
- Follow all policies and procedures
- Provide feedback on policies and procedures
- Report all harm and risk of harm to children and young people immediately to the Child Abuse Report Line
- Communicate any complaints and incident information to management
- Always comply with National Principles for Child Safe Organisations and all state legislative requirements

This policy applies to all staff and stakeholders linked to our organisation, including:

- Staff
- Contractors
- Volunteers
- Management
- Children
- Young people
- Families
- Networks

2.0 DEFINITIONS

aspiring futures SA – the trading name of Embry Care Services Pty Ltd ABN: 79 646 526 310

Child or young person – persons under 18 years of age

Complainant - a person who makes a complaint

Harm – Section 17 of the Safety Act defines “harm” as physical or psychological harm (whether caused by an act or omission), including harm caused by sexual, physical, mental or emotional abuse or neglect

National Police check – a summary of an individual’s offender history in Australia and a record of their criminal history relating to convictions, finding of guilt or pending court proceedings. They are available from South Australia Police (SAPOL) or organisations accredited by the Australian Criminal Intelligence Commission.

Working with Children Check – people working or volunteering with children in South Australia, must by law, have a valid, not prohibited, Working with Children Check. A Working with Children Check assesses whether a person poses an unacceptable risk to children. As part of the process, the Screening Unit will look at criminal history, child protection information and other information

NDIS Worker Screening Check – is an assessment of whether a person who works or seeks to work with people with a disability poses a risk to them. The assessment determines whether a person is cleared or excluded from working in certain roles with people with disability. The DHS Screening

Unit conducts the NDIS Worker Screening Check in the state or territory where a person applies for it. The DHS Screening Unit also decides whether a person is cleared or excluded.

Registered NDIS providers must ensure that they only engage workers who have been cleared in certain roles, called risk-assessed roles.

Risk assessed role is a position that has more than incidental contact with a participant, as outlined in the NDIS Rules 2018

3.0 POLICY

This policy uses National Principles for Child Safe Organisations and aims to create an environment where children and young people can feel safe by:

- Taking a preventative, proactive and participatory approach to child well-being and safety issues:
 - All staff are required to hold a Not Prohibited Working with Children Check and NDIS Worker Screening Check
 - Training staff in safety measures to prevent and identify harm or risk of harm
 - Provide children and young people with information about their rights, complaints and incidents
 - Seek feedback and input from children, young people, their families and staff to ensure that our policies and practices encompass all aspects of child safety. Feedback and input mechanisms may include:
 - Seeking feedback during support provision
 - Face-to-face meetings
 - Annual surveys
 - Feedback and complaints process
 - Annual staff performance reviews
 - Management, staff and contractors must read, understand, and sign that they have read, agreed, and complied with this policy and the Code of Conduct
- Value and embrace the opinions and views of children and young people:
 - Provide opportunities for children and young people to provide feedback through communication – email, phone, discussion
 - Documenting children’s and young people’s voice
 - Reporting input to management so we can improve and design services to meet their needs
- Assist children and young people in building skills that will assist them in participating in society:
 - Design a support plan to meet individual needs:
 - Identify areas to build skills
 - Create strategies
 - Implement strategies
 - Review and monitor skill development
 - Update and adjust as required
- Are focused and take action on protecting children and young people from harm:
 - Staff must report any harm or risk of harm identified
 - Risk management strategies must be actioned (see 3.1 Risk Management)

aspiring futures SA requires that workers (paid and unpaid) will report any suspicion of harm or risk of harm to the CARL on 13 14 78. *Aspiring futures* will provide support to all workers to complete their statutory obligations.

Staff are required to engage with children and young people and develop a relationship where the child and the young person feels safe. Staff must listen, acknowledge and respond to each child or

young person, so they know the staff member will act positively to their needs and any information they share. Children or young people can give feedback or complain by developing this trusting relationship. (Refer to Appendix B Child Safety Standards for details on approaching each standard).

Relevant handbooks are provided to staff and families, and the Employee Handbook has information about mandatory reporting. Staff are trained at induction and ongoing in child safety requirements and their mandatory reporting obligation under the Children & Young People (Safety) Act 2017. They have access to our policies to review any procedures or requirements as required.

aspiring futures SA workers, as mandatory reporters, must report any incidents of harm or risk of harm to a child or young person. Under Section 30(3) of the Children & Young People (Safety) Act 2017, employees of, or volunteers in, an organisation that provides health services are mandated reporters; therefore, our staff who perform the duties which include direct responsibility for, or direct supervision of, the provision of services to children and young people (whether or not those duties constitute child or young person-related work under the Child Safety (Prohibited Persons) Act 2016) are mandated notifiers.

Table 1: Related Policies

Policy Number	Policy Name	Endorsement Date	Review date
CM1.1_1	Aboriginal and Torres Strait Islander Policy and Procedure	Jul 2022	Jul 2024
CM1.2_1	Individual Values and Beliefs Policy and Procedure	Aug 2022	Aug 2024
CM1.5_1	Violence, Harm or Risk of Harm, Neglect, Exploitation and Discrimination Policy and Procedure	Feb 2023	Feb 2025
CM1.5_2	Working with Children Policy and Procedure	Feb 2023	Feb 2025
CM1.5_3	NDIS Worker Screening and Risk Assessed Roles Policy and Procedure	Aug 2022	Aug 2024
CM1.5_4	Zero Tolerance Policy and Procedure	Feb 2023	Feb 2025
CM2.2_1	Risk Management Policy and Procedure	Aug 2022	Aug 2024
CM2.5_1	Complaints and Feedback Policy and Procedure	Feb 2023	Feb 2025
CM2.6_1	Reportable Incident, Accident and Emergencies Policy and Procedure	Feb 2023	Feb 2025
CM2.7_1	Human Resources Management Policy and Procedure	Oct 2022	Oct 2024

3.1 Risk Assessment

Aspiring futures SA acknowledges that prevention is the best protection from harm or risk or harm and recognises their duty of care obligations to implement prevention strategies. A Participant Risk Assessment and Environment Risk Assessment are completed for each child or young person. This information allows us to create a Support Plan designed to provide support and care for the child or young person, including physical safety and the child or young person's well-being.

Identified risks may include:

- Our culture is not child-safe focused
- The organisation's current code of conduct is not role-related, targeted to our organisation, or is not circulated to or understood by staff and volunteers
- Children/young people do not feel included.
- Children/young people and their families are not supported to report concerns, complaints and feedback

- Children/young people are physically touched by staff/volunteers to correct techniques (physiotherapy, occupational therapy)
- Children/young people have access to an unsafe online environment.
- Organisational staff (including employees and volunteers) harm children/young people.
- Third-party contractors (while delivering services for the organisation) harm children/young people.
- Children/young people are not supported when harm occurs.
- Recruitment of a “prohibited person” within the organisation or contracting with a third party that does not have a Not Prohibited with Children Check (WWCC) or a child-safe environments compliance statement (see Appendix A)
- Allowing a person to work with children or young people while the WWCC is being processed.
- Organisational staff (paid and unpaid) do not understand their reporting obligations to report harm and risk to the Child Abuse Report Line and SA Police if a child/young person is at immediate risk or requires an internal reporting process before meeting legal obligations to report to CARL
- Use of power to hurt, scare or control children/young people.
- Not allowing children/young people to participate in spiritual or religious practices that are important to them.
- Children/young people are provided with unsupervised services.
- The organisation holds overnight and/or offsite activities with children/young people.
- Child safe environments compliance statement is not lodged with the Department of Human Services
- Taking images of children and young people
- Supervision of children and young people
- Physical environment
- Online communications between staff/volunteers and children/young people
- Protecting privacy and confidentiality
- Procedures for dealing with situations where a member is being investigated for or is charged with a serious criminal offence.

Risk mitigation actions:

- Child-focused Code of Conduct sets the expected behavioural standards, including what happens when a breach occurs, is circulated to staff and volunteers, and is displayed in public places.
- Meet the requirements of the Children and Young People (Safety) Act 2017 (which mandates child-safe environments) and the Child Safety (Prohibited Persons) Act 2016 (which mandates Working with Children Checks)
- Strategies are in place to ensure that child safety (through the National Principles for Child Safe Organisations) is embedded across the organisation.
- The organisation uses inclusive, developmentally appropriate language and resources to help children/young people to feel valued, respected and included.
- Strategies to embed a child-safe organisational culture are reviewed and updated regularly.
- The Child Safe Environments Policy is reviewed at least every two years. When this happens, a new child-safe environments compliance statement is lodged with the Department of Human Services
- Support through training and supervision is provided to organisational staff (including employees and volunteers) through:
 - Quarterly reviews
 - Seeking feedback from supervisors
 - Induction training – understanding of harm and risk of harm and how to report effectively.

- Regular supervision meetings are conducted to review practice and update where appropriate, and training provided that increases awareness
- holding a Working with Children Checks (WWCC)
- Recruitment processes include interviewing and undertaking referee checks to ensure the suitability of persons before they are employed/volunteer with our organisation
- When taking images of children and young people, must have the consent of the child or young person and parent/guardian consent required
- Complaints processes are in place and promoted to children, young people and their families to make sure that they feel safe reporting to the organisation
- Cyber safety and social media guidelines are in place and provided to all staff and volunteers.
- Appropriate supervision is provided for all online activities
- Children and young people are to be supervised by parents/guardians at all times
- Our child-safe environments policies and procedures (including Code of Conduct) are made available to staff, volunteers, children, young people and their families in the Participant Orientation Pack
- Children, young people and their families are encouraged to participate in our organisation and provide feedback through surveys, and questionnaires.
- If children and young people are harmed, we support them and their families following the organisation’s reporting and responding to harm/risk of harm procedure which sets out the process for reporting to CARL and connecting those impacted with appropriate support services.
- Staff, volunteers and contractors undertake training to understand their obligations to report harm and risk of harm (see 3.2 below)
- All staff, volunteers, and contractors must read the Child Safe Environments Policy, Code of Conduct, and Child Safe Environments Mandatory Notification Information Booklet (see 3.2 below)
- Where physical contact is required, this is undertaken safely 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.
- Staff, volunteers and contractors working with children and young people with disability must hold a valid Not Prohibited Working with Children Check (WWCC) even if they are working with children and young people less than seven days a year

According to our internal reviews of policies and procedures, this policy must be reviewed at least every two years (see 3.0 Policy Table 1 Related Policies and Version Control for Review Date)

Staff should guide children and young people who require assistance to Kids Helpline on 1800 55 1800 and Youth Helpline on 1300 13 17 19 for support, as required.

3.2 Staff Requirements, Support and Training

The legislative requirement is that staff engaged in a risk-assessed role must have the required South Australian clearance checks. We will meet the requirements of the Child Safety (Prohibited Persons) Act 2016 and ensure that staff and volunteers have a valid, “not prohibited” Working with Children Check issued by the Screening Unit of the Department of Human Services.

All staff must undergo an interview before a job offer is made. This interview will include:

- Overview experience working with children and young people
- Behaviour management techniques, e.g. questions such as:

- Tell me about when you had to manage a child or young person with behavioural problems
- How would you respond if a child or young person yelled at you?
- What if they started to throw items?

Screening post-interview of the suitable candidate is essential, and this process includes at least two (2) reference checks and qualification checks. All hired staff will have buddying in two (2) shifts, be allocated a supervisor and have a probationary period.

During their onboarding process, all staff and volunteers are trained in child and young person's safety and must undertake annual training to ensure they are current with standards and requirements. Staff must read and agree to comply with the Code of Conduct (see Appendix B). We will use the Mandatory Reporter Guide as part of the training. Our staff annual performance review will review current knowledge of standards and reporting. This information will be used to create relevant training against SA requirements. All information will be recorded in the person's Staff Training Record in LMS; note that contractors will have this form to record their training to ensure compliance.

Staff will be trained in the following:

- The real or potential risk of harm indicators
- Mandatory reporting obligations
- Internal requirements for informing management
- Completing Incident Investigations so management can review the information
- Not asking leading questions
- Code of Conduct
- Commitment to the safety of children and young people
- Record keeping and information sharing
- Position description

Our mandated notifiers to attend a "Safe Environments: Through Their Eyes" training course. Management meetings will include child and young person's safety on their agenda. Staff, contractors, and volunteers must:

- Read and understand the Mandatory Notification Information Booklet see [cse-mandatory-notification-information-booklet-2019-dhs-update.pdf](#)
- View the resources Keeping our kids safe developed by SNAICC at [Keeping our kids safe - SNAICC](#)
- Be provided with professional development opportunities to build knowledge and skills regarding the well-being and development of children and young people
- How regularly they complete the specific training e.g. every three years (mandatory reporting, Keeping our kids safe)

All staff have quarterly supervision and support meetings or visits, allowing us to determine the current knowledge and skills of the worker, therefore, allowing us to create additional support and guidance as required. Staff reporting any risk of harm will undertake a debriefing session, and this session will determine additional support required, e.g. professional support.

Before employment, staff must undergo the Working with Children Check and NDIS worker screening process. Results are recorded in their personnel file. Employees performing within a child or young person-related role have been determined as a risk-assessed and require NDIS Worker Screening and a WWCC. The employee must apply to the DHS Screening Unit, provide the relevant application information and pay the fee and we will verify all current WWCC on the DHS Screening Portal and follow NDIS Worker Screening.

It is then the responsibility of the Director to verify all risk-assessed roles and maintain appropriate records using the Risk Assessed Role Register. Staff cannot work with children and young people unless their worker's screening has been verified in the DHS Screening Unit portal.

Staff, volunteers, contractors, or other relevant parties must comply with child-safe standards, legislation and regulations. At any stage, a person breaches any of these compliance requirements, the Director will advise the Screening Unit regarding this person, including any serious criminal offence, child protection information, or disciplinary or misconduct information. The informing method will vary according to the current issue but will usually be via phoning the Screening Unit.

4.0 PROCEDURE

4.1 Communication

We have developed a Child and Young Person's Handbook and Employee Handbook that informs children and young people and staff about rights and their right to participate in decisions affecting them. We will always take input seriously as per National Principle 2.

During the initial intake, development of a support plan and reviews, our team informs and involves families in promoting the safety of the child or young person. We work with the child or young person's community to ensure information is provided and they are involved in the child or young person's safety and wellbeing (National Principle 3).

To comply with Chapter 8 (Section 114(5) of the Children and Young People (Safety) Act 2017), children, young people, their families, networks, staff and contractors can request a copy of the organisation's child safe environments policies and procedures. We will make this information available in Care Diary. To request a copy:

- Email: info@aspiringfuturessa.com.au
- Telephone: 08 7092 4094
- The Director or their delegate will forward the policy within 2 business days

4.2 Listening to Children and Young People (National Principle 2)

Our organisation will:

- Communicate using age and developmentally appropriate language
- Feedback and concerns can be reported by children, young people and their families or carers by:
 - Email: feedback@aspiringfuturessa.com.au
 - Telephone: 08 7092 4094
 - Staff or contractors who will record and inform management
- Design consultation methods suited to our clientele that consider the child or young person's age, developmental level and cultural backgrounds
- Using a survey
- Invite formal or informal feedback from children and young people about their experiences with us
- Invite children and young people to be represented on

4.3 When to Report a Real or Potential Risk of Harm Situation

Staff should refer to *harm* and *at-risk* definitions to clarify any belief or real risk of harm.

For any child and young person at immediate risk of harm, staff must call 000 (Police) immediately, then inform management. The individual's safety must be at the forefront of all

actions.

It is important to always search for the cause of a change in a child or young person's behaviour or unexplained physical symptoms. If a child or young person shows one or more of the possible signs of harm or risk of harm, it must be reported immediately, even though this does not automatically mean harm has taken place.

The person who formed the suspicion or formed the belief will report to the South Australian Government's Department for Child Protection. Failure to make a report of harm or risk of harm has a maximum penalty of \$10,000

Failure to report sexual abuse of a child to SA Police or failure to protect a child from sexual abuse may result in a criminal offence, for example:

- Criminal Law Consolidation Act
 - failure to report child sexual abuse – a maximum of 3 years imprisonment (section S64A),
 - failure to protect a child from sexual abuse – a maximum of 15 years imprisonment (section S65)

4.4 How to Report

aspiring futures SA requires that workers (paid and unpaid) will report any suspicion of harm or risk of harm to the Child Abuse Report Line (CARL) on 13 14 78. *aspiring futures* will provide support to all workers to complete their statutory obligations.

The person reporting the incident will use the online child or young person protection reporting system to report a less serious concern(s):

Department of Child Protection

Website: [Reporting child abuse | Department for Child Protection](#)

The staff member will use their professional understanding and knowledge of child and young person protection to determine when to contact the required reporting body. The person who formed the suspicion or formed the belief will undertake the following:

- At the time it is determined there is a risk of harm, they will report a suspected case of a child or young person's harm or risk of harm via a phone call to:
 - Child Harm or Risk of Harm Report Line (CARL) – Phone 13 14 78
 - If at immediate risk, report to South Australian Police (SAPOL) – Phone 000
 - In cases involving Aboriginal children and young people, support is provided by Yaitya Tirramangkotti – an Aboriginal team, via the CARL number
- All serious concerns are reported via the Child Abuse Report Line and not via the website's online reporting system.

The individual who identifies the harm or risk of harm is the person who makes the report to CARL/SAPOL and afterwards is required to report internally, so the Director can determine if further support is required for the child or their family. In all cases, we will be guided by the relevant authority (Department for Child Protection / SA Police) about how to proceed after notification.

4.5 Details to Provide

The staff member will provide the following information to the Child Abuse Report Line:

- Child or young person's name, age, date of birth and address
- Description of injury, harm or risk of harm (outline current and previous)

- Child or young person’s current situation
- Location of the child, young person, parent or caregiver and alleged perpetrator
- When and how the manager found out the harm or risk of harm

4.6 Child Identification Details and Content

aspiring futures SA will need to provide enough detail to identify the child or young person and give context to the report, including:

- Child or young person’s full name
- Date of birth or age
- Current address
- Contact number
- School/kindergarten/childcare centre
- Ethnicity, i.e. cultural background, aboriginal kinship group, non-English speaking
- Who are the parents; do they all live in the same house; are there siblings in the house?
- Alleged perpetrator’s name, age, address, relationship to the child or young person, and current whereabouts
- Current whereabouts of the child or young person of concern
- Details of when the next expected contact with the alleged perpetrator will occur
- If in place, family court orders, apprehended violence orders, and domestic violence orders

4.7 Supporting a Child, Young Person, Family and Staff

Our management will put support strategies in place for the child, young person and their family. Strategies will vary according to the situation, and staff will be informed, trained and supported in implementing strategies.

Strategies may include:

- Inform the child/young person/family that they are believed. One of the most helpful things you can do following disclosure of harm or risk of harm is to believe the child or young person
- Reassure the child or young person that they have done the right thing by telling someone about the harm and that they are not in trouble. Provide them with age-appropriate information regarding what will happen next, ensuring that the adults take care of things (contact Kids Helpline or Youth Helpline). Be careful not to make promises you can’t keep, such as not telling anyone else
- Act proactively
- Take immediate steps to ensure the child or young person’s safety and the safety of other children or young people who may be exposed to harm, risk of harm
- Provide adequate support to meet the needs of the individual circumstances, e.g. cultural support and advocacy support
- Provide staff with debriefing and other supports to ensure that their health and well-being are supported

4.8 Defining Child Maltreatment, Harm or Risk of Harm

Child harm, abuse and neglect includes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Such behaviours may be intentional or unintentional and can include acts of omission (i.e. neglect) and commission (i.e. abuse).

4.8.1 Physical harm or risk of harm

Potential indicators include the following:

- bruises in unlikely places (face, back, ears, hands, buttocks, upper thighs and soft parts of the body)
- inconsistent or unexplained bruises
- any bruising on a baby
- pressure marks from fingers on the face, chest or back
- weal, ligature or bite marks
- skull fracture, subdural bleeding, multiple fractures of different ages
- suspicious burns
- poisoning or significant over-medicating.

4.8.2 Psychological and emotional harm or risk of harm

Potential indicators include the following:

- avoiding home (particularly if the abuser is in the family home)
- running away or continually staying at friend's houses
- fear of the dark, not wanting to go to bed, bedwetting or nightmares.
- lying or stealing
- lack of trust in adults
- poor self-image or self-esteem, poor academic performance, poor peer relationships
- secretive, demanding or disruptive behaviour

4.8.3 Sexual abuse

Potential indicators include the following:

- genital injuries
- bite marks
- sexually transmitted diseases
- persistent soiling or bedwetting
- sleep disturbance
- inappropriate sexual behaviour based on the child's age
- promiscuous affection seeking behaviour
- excessive masturbation which does not respond to boundaries or discipline
- obsessive and compulsive washing
- wariness of physical contact with others
- unusual fear of having a nappy changed

4.8.4 Failure to care

Potential indicators include the following:

- failure to thrive
- developmental delay
- prone to illness
- sallow or sickly appearance
- abnormally high appetite, stealing or hoarding food
- smelly or dirty appearance
- untreated medical conditions

4.8.5 Social harm or risk of harm

Potential indicators include the following:

- Sadness and grief due to people not visiting,
- anxiety after a specific person's visit,
- withdrawal,
- low self-esteem,

- appearing ashamed, passivity, and listlessness

4.8.6 Grooming

Potential indicators include the following:

- talks a lot about a particular adult or older child, or wants to spend a lot of time with them or meet them alone
- is in a relationship with a much older person
- is skipping school or sporting activities
- is spending less time with friends or changes friendship groups suddenly
- spends more time alone in their room
- has unexplained gifts like new toys, clothes, jewellery or electronics and doesn't want to talk about where the gifts came from
- doesn't want to talk about what they've been doing or lies about it
- stops telling about their day or asking for advice.

4.8.7 Complaints and Feedback

This section is not to be used when there is a reasonable belief that a child or young person has been harmed or is at risk of harm. Refer to 4.3 above. Any complaint about staff, volunteer or contractor that identifies and is found to be real may lead to disciplinary measures and their employment being ceased. Any validated complaint related to child protection will lead to the termination of employment, a report to the DHS Screening Unit and a mandatory report to the Child Abuse Report Line.

Complaints and suggestions can be made by:

- Using the Complaints and Feedback Form or the Anonymous Complaints and Feedback Form
- Contacting a member of staff, verbally or in writing, our staff must offer to document the complaint on behalf of the participant if required and refer the matter to the Director
- Responding to questionnaires and surveys
- Sending an email to our contact email
- Attending meetings
- Children and family contacting external complaint agencies, e.g.
 - NDIS Quality and Safeguards Commission (1800 035 544),
 - Kidsafe SA (08 8161 6318)
 - Complaints and Feedback Management Unit, Department for Child Protection (1800 003 305)
 - Disability Advocacy and Complaints of SA (08) 7122 6030) -
- Communicating orally, in writing, or any other relevant means

Contacts for making complaint are listed below:

Email: feedback@aspiringfuturessa.com
 Phone: 08 7092 4094
 Address: 32 Stirling Street, Thebarton SA 5031

Complaints may be made by:

- Staff
- Participants (adults, children and young people)
- Public
- Advocates

- Family members
- Carers
- Anonymous person(s)

Results are recorded in Care Diary under Feedback, allowing input into our continuous improvement processes. This Continuous Improvement Register will record improvements established after finalising the complaint management process.

If a complaint is about:

- Support or services: The Service Delivery Manager will deal with the complaint
- Staff members: The Operations Manager will deal with the complaint
- Director: The Leadership Team or an external person or body may be approached, e.g. NDIS Quality and Safeguards Commission

All staff, participants, family and advocates, visiting health professionals, and visitors are informed of our complaints process via:

- Participant orientation pack
- Initial access to supports
- Staff orientation, induction and training
- Meetings, reviews and assessments
- Participant agreements
- Contractor agreements

4.8.8 Complaint management process

The investigation process must adhere to impartiality, privacy, confidentiality, transparency and timelines. Complaints will not be discussed with anyone who does not have responsibility for resolving the issue. *aspiring futures SA* must take into consideration any cultural and linguistic needs of a participant and provide the relevant support mechanism, such as an interpreter or similar.

Complainants are provided with access to our Complaints and Feedback Form. These may be accessed via staff or management. The Director or their delegate will review the individual's needs and assist them via the best means appropriate to suit them. The variance between individuals requires a personal approach but may include:

- Offering an advocate
- Providing text telephone (TTY) service to people with a hearing impairment
- Ensuring the meeting site is wheelchair accessible
- Offering independent assistance to read and write to formulate and lodge a complaint
- Seek information from the complainant to determine any special requirements (e.g. access or communication)

The resolution outcomes from a complaint will recognise that people who make a complaint are generally seeking one, or more, of the following outcomes:

- Acknowledgement:
 - Genuinely listening without interruption
 - Empathising
 - Ensuring the complainant feels comfortable (e.g. being aware that staff may be defensive and consider how this is perceived)
 - Acknowledgement of the effect of the situation on the individual

- Resolving to a good outcome
- Notifying regularly and promptly on steps undertaken
- Answers:
 - Clear explanations relevant to the issue are provided ONLY once all the facts are known
- Actions (Action Plan):
 - What will be done?
 - Who will do it?
 - Action plan completion date
 - How progress will be communicated to all parties involved
 - Oversight of actions
- Apology:
 - Consider the form of the apology and the managerial level of response
 - Consider timelines, sincerity
 - Be specific and direct
 - Accept responsibility if appropriate and provide information on the cause and impacts
 - Explain without excuses
 - Provide a summary of key actions agreed on to move forward and resolve the issue

5.0 POLICY REVIEW AND FEEDBACK

This policy and procedure will be reviewed at least every two (2) years by the Director (or their delegate) or in response to legislative triggers. Reviews will incorporate staff, participants, and other stakeholder feedback where relevant.

6.0 RELATED DOCUMENTS

Employee Handbook
 Code of Conduct
 Incident Form (Care Diary)
 Incident Register (Care Diary)
 Progress Notes (Care Diary)
 Participant Risk Assessment Form
 Risk Register (Care Diary)
 CM1.1_1 Aboriginal and Torres Strait Islander Policy and Procedure
 CM1.2_1 Individual Values and Beliefs Policy and Procedure
 CM1.5_1 Violence, Harm or Risk of Harm, Neglect, Exploitation and Discrimination Policy and Procedure
 CM1.5_2 Working with Children Policy and Procedure
 CM1.5_3 NDIS Worker Screening and Risk Assessed Roles Policy and Procedure
 CM1.5_4 Zero Tolerance Policy and Procedure
 CM2.2_1 Risk Management Policy and Procedure
 CM2.5_1 Complaints and Feedback Policy and Procedure
 CM2.6_1 Reportable Incident, Accident and Emergencies Policy and Procedure
 CM2.7_1 Human Resources Management Policy and Procedure

7.0 REFERENCES

Children and Young People (Safety) Act 2017 (SA)
 Child Safety (Prohibited Persons) Act 2016 (SA)
 NDIS (Practice Standards – Worker Screening) Rules 2018
 NDIS (Quality and Safeguards) Commission 2018

The National Framework for Protection Australia’s Children
United Nations Convention on the Rights of the Child 1989
National Principles for Child Safe Organisations

Version Control				
Version No.	Summary of Changes	Date Approved	Approved By	Review Date
V0.1	Draft	Dec 2021		
V1.0	Initial Release	Feb 2021	Director	Feb 2024
V2.0	Changes based on ProviderPlus release V2.12	Aug 2022	Director	Aug 2024
V2.1	Review to link with SA Child Safe Environment requirements	Feb 2023	Director	Feb 2025

8.0 Appendix A – Commitment to the Safety of Children and Young People

aspiring futures SA is committed to the safety and well-being of all children and young people who will be the primary focus of our care and decision-making. We have zero tolerance for children and young people being at harm or risk of harm.

We are committed to providing a child-safe environment where children and young people are safe and feel safe, and their voices are heard about decisions that affect their lives. Particular attention will be paid to the cultural safety of Aboriginal children and children from culturally and/or linguistically diverse backgrounds and the safety of children with a disability.

All people working for or with us have a responsibility to understand the important and specific role they play individually and collectively to ensure that the well-being and safety of all children and young people are at the forefront of all they do and every decision they make.

In our planning and practices, we will

- Children and young people's safety and protection are our priority
- Children and young people are valued, respected and encouraged to participate. Their voice is essential to providing appropriate and safe support.
- Take a preventative, proactive and participatory approach to child safety
- Value and empower children to participate in decisions that affect their lives
- Foster a culture of openness that supports all persons to disclose harm or risks of harm to children safely
- Respect diversity in cultures and child-rearing practices while keeping child safety paramount
- All children and young people are embraced regardless of their abilities, sex, gender, or social-economic or cultural background and equity is upheld
- Engage only the most suitable people to work with children and have high-quality staff, supervision and professional development
- Ensure children and young people know who to talk with if they are worried or are feeling unsafe and that they are comfortable and encouraged to raise such issues
- Assist children and young people in building skills that will assist them in participating in society
- Focus and take action on the protection of children and young people at risk of harm
- Value the input from children, young people and their families in our policies and practices
- Report suspected harm or risk of harm, neglect or mistreatment promptly to the appropriate authorities
- Share information appropriately and lawfully with other organisations where the safety and well-being of children are at risk

Child and Young Person's Handbooks and accessible display areas include information about services that can assist children and young people

- Kids Helpline on 1800 55 1800
- Youth Helpline on 1300 13 17 19

9.0 Appendix B – Child Safe Standards

9.1 Standard 1. Child safety is embedded in our organisational leadership, governance and culture

- Commitment to safety
- Staff are trained in:
 - child or young person's safety
 - Codes of Conduct
 - behavioural standards when interacting with children and young people
 - reporting obligations and record keeping.
- Risk management plans are undertaken for each child.
- Comply with the NDIS Code of Conduct, our organisation's Code of Conduct and the Statement of Commitment to Safety (See Appendix A).

9.2 Standard 2. Children participate in decisions affecting them and are taken seriously

- Children and young people can express their views and are provided opportunities to participate in decisions that affect their lives:
 - upon commencement with our organisation
 - on an ongoing basis (they are asked regularly for their thoughts and ideas)
 - at the review of their plan.
- The importance of friendships is recognised, and support from peers is encouraged, helping children and young people feel safe and be less isolated.
- Work with the child, young person and the family to determine how best to assist with these linkages.
- Children and young people can access harm or risk of harm prevention programs and information.
- We provide links to relevant organisations such as Kids Helpline, as needed.
- Age-appropriate information that describes how adults should behave towards the child or young person is provided.
- Staff are attuned to signs of harm and facilitate child-friendly ways for children and young people to communicate and raise their concerns:
 - staff trained to work with each child and young person
 - knowledge and skills are assessed to determine training to ensure skills and knowledge are evident.

9.3 Standard 3. Families and communities are informed and involved

- All levels of our organisation encourage families to take an active role in keeping children and young people safe.
- Our policies and procedures (including the Code of Conduct) are communicated to parents and carers (e.g. Participant Orientation Pack including Child and Young Person's Handbook)
- Families and community members are encouraged to provide feedback on how well the organisation keeps children and young people safe, and this information is acted upon where necessary: Feedback can be provided via:
 - a Complaint and Feedback Form
 - meetings are held about a child and young person.

9.4 Standard 4. Equity is upheld, and diverse needs are considered

- The Director and our staff understand the type of barriers that prevent children and young people from disclosing harm or risk of harm or adults from recognising a child or young person's disclosure.
- The Director and our staff identify and respect the diverse needs, abilities and backgrounds of children and young people and understand the value of treating them fairly.
- Our organisation reviews each child or young person's cultural needs at intake.
- We provide relevant, culturally sensitive, age-appropriate activities to children.

- All staff are trained and provided information about the factors that may increase a child or young person's vulnerability to harm.
- The Director ensures that our workforce reflects the diversity of the children and young people we provide services to, where possible.
- The Director and staff adapt activities and services to ensure all children and young people feel included, and we undertake the following for each child:
 - risk management plan
 - strategy planning.

9.5 Standard 5. People working with children are suitable and supported

- When recruiting, *aspiring futures SA* does not solely rely on the Working with Children Check. We also provide ongoing staff training opportunities for all staff, including:
 - induction
 - annual training
- When recruiting, *aspiring futures SA* is aware of and implements child and young person safe recruitment practices.
- All vacant position advertisements identify that we value the child and young person's safety.
- Recruitment processes involve a range of interview questions to establish staff suitability.
- Background and reference checks are recorded (see Human Resource Management Policy and Procedure).
- Supervision includes regular reviews to check whether staff follow Codes of Conduct and other child-safe policies.
- The Director or their delegate monitors all aspects of supervision and undertakes employee supervision at least quarterly.

9.6 Standard 6. Processes when responding to complaints of child harm (or other concerns) are child- focused.

- The Director or their delegate builds a culture where complaints are taken seriously, and all employees take responsibility for the safety of children and young people using our induction process and cultural staff training.
- During a new employee's induction, the Director or their delegate clearly explains that the Code of Conduct breaches will result in disciplinary action. Staff are also informed of this ongoing through internal training sessions.
- Staff are given support and information on what and how to report, including external bodies.
- Accessible procedures enable children, young people, staff and others to make complaints. These procedures include potential time frames, review processes and potential outcomes of complaints.
- Complaints are handled confidentially (see Complaints and Feedback Policy and Procedure).
- Processes are reviewed at regular intervals and after a complaint is received by *aspiring futures SA*
- Documents are treated confidentially, as required.

9.7 Standard 7. Staff are equipped with knowledge, skills and awareness to keep children safe through continual education and training

- The Director or their delegate provides ongoing education and training opportunities for all staff, including:
 - knowledge, skills and confidence to prevent and identify real or potential harm, and
 - how to respond to and report complaints.
- Additional training is provided when higher risks towards a child or young person are involved, e.g. behaviour management
- The Director or their delegate is our Child Safety Officer and is responsible for all staff training.
- Training is regularly reviewed in response to emerging best practices.

9.8 Standard 8. Physical and online environments minimise the opportunity for harm or other kinds of harm to occur

- The Director or their delegate sets expectations regarding behavioural standards for staff when interacting with children and young people in physical and online environments.
- Risk assessments identify areas where staff have opportunities to interact with children and young people unsupervised, including one-off events and overnight accommodation.
- Physical environments are altered to increase natural sightlines while respecting a child and young person's right to privacy.
- Higher-risk areas such as cars, boarding facilities and offsite locations are managed using specific safety measures, such as spot checks.
- Children and young people are provided information regarding online safety and are regularly encouraged to tell staff about negative experiences.
- Staff and parents are provided information about risks in the online environment (e.g. online grooming, cyberbullying and sexting).

9.9 Standard 9. Implementation of Child Safety Standards is continually reviewed and improved

- The Director or their delegate maintains a culture of continuous improvement to ensure that policies and procedures are implemented and routinely reviewed even though staffing may change.
- The Director understands the value of continuous monitoring, open conversations and exploring new ways to keep children safe.
- Our child-safe policies and practices are reviewed at least every two years.
- Staff refer to the Child Safe Standards when creating, reviewing or evaluating child-safe policies and procedures.
- Critical incidents are used to identify the root cause of a problem, identify risks to children and young people's safety, and improve (e.g. Incident Form(Care Diary) and Continuous Improvement Register (Care Diary)).
- Children and young people are supported to provide feedback which we will act on if required.

9.10 Standard 10 Policies and procedures document how the organisation is child safe

- The Director or their delegate will ensure that policies and procedures are reviewed and compliant.
- *aspiring futures SA* acknowledges that we will be held accountable for our policies and procedures.
- Staff are trained and knowledgeable about organisation procedures, especially how they relate to child and young person's safety
- Staff, parents and carers are informed and have access to *aspiring futures SA* Child Safe Environments policies and procedures and complaint policy and procedure.

10.0 Appendix C – Code of Conduct

I will

- Act following our child and young persons' safety and well-being policies and procedures.
- Behave respectfully, courteously, and ethically towards children, young people, families, and other staff.
- Listen and respond 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.
- Promote the human rights, safety and well-being of all children and young people in the service.
- Demonstrate appropriate personal and professional boundaries.
- Consider and respect the diverse backgrounds and needs of children and young people.
- Create an environment that promotes and enables children and young people's participation and is welcoming, culturally safe and inclusive for all children, young people and their families.
- Involve children and young people in making decisions about activities, policies and processes that concern them.
- Contribute, where appropriate, to policies, discussions, learning and reviews about child and young person's safety and well-being.
- Identify and mitigate risks to children and young person's safety and well-being as required by our risk assessment and management policy or process.
- Respond to any concerns or complaints of the child or young person's harm or abuse promptly and in line with our services policy and procedure for receiving and responding to complaints.
- Report all suspected or disclosed child and young person harm or abuse required by *Children & Young People (Safety) Act 2017* and our policy and internal and external reporting procedure.
- Comply with our protocols on communicating with children.
- Comply with *Children & Young People (Safety) Act 2017* and these policies and procedures on record keeping and information sharing.
- Adhering to our Child Safe Environment Policy at all times and taking all reasonable steps to ensure the safety and protection of children and young people
- Treating everyone (this includes staff, volunteers, students, children, young people and parents), 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 your conduct with them
- Setting clear boundaries about appropriate behaviour between yourself and the children and young people in your organisation – boundaries help everyone to understand their roles
- Listening and responding appropriately to the views and concerns of children and young people
- Ensuring another adult is always present or insight when conducting one to one coaching, instruction or other activity
- Being alert to children and young people who are 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 serious 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

I will not

- Engage in any unlawful activity with or concerning a child and young person.
- Engage in any activity that is likely to physically, sexually or emotionally harm a child or young person.
- 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.
- Be alone with a child or young person unnecessarily.
- Arrange personal contact, including online contact, with children and young people I am working with for a purpose unrelated to our activities.
- Disclose personal or sensitive information about a child or young person, including images of a child or young person, unless the child, young person and their parent or legal guardian consent or unless I am required to do so by our policy and procedure on reporting.
- Use inappropriate language in the presence of children or young people, or show or provide children and young people with access to inappropriate images or material
- Work with children and young people while under the influence of alcohol or prohibited drugs.
- Ignore or disregard any suspected or disclosed child or young person's harm or abuse.

If I notice or consider any person has breached this Code of Conduct, then I will

- Act to prioritise the best interests of children and young people.
- Take action promptly to ensure that children and young people are safe.
- Promptly report any concerns to my manager or Child Safety Officer, the Director or another manager or leader in *aspiring futures SA*.
- Follow policies and procedures for receiving and responding to complaints and concerns.
- Comply with SA requirements if relevant and with policy and procedure on internal and external reporting

I have read the Child Safe Environments Policy, and this Code of Conduct and agree to abide by these requirements during my employment. I understand that breaches of this Code of Conduct may lead to disciplinary action or termination of my employment.

Name	
Position	
Date	

Adapted from Child Safety Organisations National Principles