



ORGANISATIONAL MANUAL

CHILD SAFE ENVIRONMENTS

ACTIV8 MIND

INDEPENDENCE
WELLNESS
PERSONAL GROWTH
TRANSFORMATION

CHILD SAFE ENVIRONMENT POLICY

Statement of Purpose

Activ8 Mind recognise that children and young people have the right to be safe and protected at all times and free from harm or risk of harm in line with the Children and Young People (Safety) Act 2017 (Safety Act) and the Child Safety (Prohibited Persons) Act 2016. This policy has been developed to ensure Activ8 Mind upholds a framework of practice which demonstrates our commitment to children's safety and wellbeing, reflects our values and meets ethical, moral and legal requirements.

Accordingly, the child safe environment policy is applicable to all Activ8 Mind employees, volunteers and contractors who are providing support for children and young people and will outline the responsibilities for everyone involved in the organisation. This policy will be reviewed biannually

Commitment to the safety of children and Young People

National Principle 1

Activ8 Mind is committed to protecting and safeguarding the safety of children and young people which is of paramount importance to our organisation.

Activ8 Mind is committed to preventing harm or risk of harm occurring to children and young people in its services. Our policy complies with the Children and Young People (Safety) Act 2017 (Safety Act) and the Child Safety (Prohibited Persons) Act 2016. We are mindful that children and young people with disabilities are vulnerable to harm and that their safety and wellbeing is of paramount importance. We have zero tolerance of harm or risk of harm to children and young people and all allegations and safety concerns will be treated very seriously and consistently with our policies and procedures.

Children and young people have a right to be protected and treated with respect. Of particular importance is that they are listened to, heard and have their views taken into consideration.

Activ8 Mind is aware that parents / guardians have the primary responsibility for the welfare of their child or young person and as such support, encouragement and respect for parents / guardians is a key feature.

Activ8 Mind aims to promote a culture that fosters the welfare of children/ young people and the prevention of harm which is integrated into leadership and flows through the organisation. Our policy applies to all employees, contractors and volunteers. We have a robust recruitment and induction process in place to reduce the risk of harm to children and young people by our employees, contractors or volunteers. All inductees to the organisation are required to familiarise themselves with this policy

We are committed to diversity and all children and young people are embraced regardless of their abilities, sex, gender, or social economic or cultural background and equity is upheld. Bullying and harassment will not be tolerated.

Scope of Policy

National Principles 1-10

For the purposes of this policy, the "organisation", "Activ8 Mind" and "we" refers to Activ8 Mind and all its business units and sites. This policy applies to children, young people, families, staff (all employees), management, contractors, students, and visitors to our business. All of our employees are required to review this policy and agree to accept and act in accordance with this policy, via their sign off on this.

Communication

National Principle 2 and 3

Activ8 Mind provides access to our Child Safe Environments Policy and Code of Conduct publically on our website and through other internal platforms.

Upon service commencement Activ8 Mind's Child Safe Environments Policy is explained to both the child/ young person and their parent /guardian in a method which suits and fosters greatest comprehension. Key features of the policy are outlined including our commitment to equity, diversity, inclusion, how we maintain safety and minimize harm, what to do if you are feeling uncomfortable, how to raise a complaint or feedback and the extent of our responsibilities in respect of reporting and mandated notification.

Activ8 Mind ensure that each staff member, contractor or volunteer has read and adheres to this policy.

Participation of Families, children and young people

National Principle 2 and 3

Activ8 Mind encourages and respects the views and opinions of children and young people who access our services.

Activ8 Mind involves children and young people in the decision making by listening and acting upon feedback and complaints which children, young people, and families/stakeholders raise with the organisation. Activ8 Mind ensures that children, young people, and families/stakeholders understand their rights, and how to appropriately access services, advice and the complaints processes that are available to them.

Upon service commencement, the process for accessing our Child Safe Environments Policy is outlined, in addition to the key features of the policy. This is explained in a method which is understandable by both the child/ young person and the parent / guardian and simplified as needed to better enable their participation and views.

Activ8 Mind provide health and human services, specialising in mental health and behavioural interventions. Providing such services requires sensitivity, empathic communication, high adherence to professional conduct and clinical judgement. All of our professional staff provide age appropriate therapies and interventions and relate to children / young people in ways which are sensitive, empowering, free from swearing, adult language and concepts. Resources which are used to provide services are also age appropriate.

Activ8 Mind listen to and act upon any concerns which are raised. Further to this we procure feedback on an annual basis, when there is an internal change in practitioner and upon cessation of service. Part of the feedback procured focuses on aspects of the child safe environments policy and in particular how well we have upheld our commitment to provide a service which fosters safety, wellbeing and participation.

Code of Conduct

National Principles 4, 6 and 8

The purpose of the Code of Conduct is to guide and enhance the conduct of employees, contractors and volunteers in performing their duties in the organisation's daily activities. The Code of Conduct applies to all employees, contractors and volunteers of Activ8 Mind.

Those providing professional health and human services are also governed by a membership with a Professional Body and as such must also apply the Professional Body's Code of Conduct to their daily working activities.

Generally Activ8 Mind's code of conduct incorporates standards on respect, integrity, avoiding conflict of interest, diligence, dress code and communication code. Further to this and specifically relating to working with children / young people, Activ8 Mind's code of behaviour requires that all individuals uphold respect, honesty, appropriate physical and verbal interactions with children. This includes avoiding any behaviour that could be perceived as inappropriate such as physical contact beyond what is necessary, sexual comments or jokes or sharing personal information.

Activ8 Mind's reporting protocol outlines that all concerns or suspicions regarding the welfare of a child/ young person should be reported immediately. Any safeguarding concerns should be taken seriously and confidentiality should be maintained when sharing information.

Risk assessments should be undertaken for all environments whereby Activ8 Mind are engaging with children / young people.

When using technology to communicate with children / young people appropriate safeguards should be in place including parental consent and appropriate language.

Complaints or notifications regarding breach of our Code of Conduct can be lodged in several ways:

- Verbally
- Completing the feedback form which is available upon request, via email to our administration team info@activ8group.com.au and via our website
- By calling Activ8 Mind on 1300 575 329.

Recruitment

National Principle 5

Activ8 Mind take all reasonable steps to employ qualified and skilled people to work with children/ young people. We develop selection criteria and position advertisements which clearly show our values and the requirements for having a Police Clearance, NDIS Worker Check and Working with Children Checks in place. While some of the frameworks within which we service do not require all of these clearances, we uphold the highest level of clearance so as not to compromise our NDIS registration and service activities involving children. During the recruitment process Activ8 Mind ensures, by sighting clearance documents, that staff/ contractors/ volunteers hold these clearances. The recruitment procedure at Activ8 also ensures that the appropriate verification of qualifications is undertaken prior to employment. Only staff with appropriate qualifications, skills and competence are recruited.

In addition, all new employees are verified through a minimum of two telephone reference check.

We do not discriminate against applicants who are from Indigenous or culturally diverse backgrounds or with a disability, providing they can meet the essential requirements of the role and have the above clearances/ checks.

Upon commencement, all employees, contractors and volunteers review and agree to the child safe environment policy during induction and before commencing work with any child/ young person thereby ensuring they are cognoscente of working within a framework of policies and procedures which adheres to these principles and the corresponding legislation.

All staff will review and sign the Child Safe Environments Code of Conduct before commencing work with any child or young person. Additionally, staff will review the Mandated Notified Reporting Guide and are encouraged to complete Strategies for Managing Abuse Related Trauma (SMART) training.

Our human Resource management system flags when clearances are due to expire and prompts for a renewal, thereby reducing the chance that practitioners are working with children/ young people without an active /valid check in place.

Activ8 Mind will inform the screening unit if and when we become aware of certain information regarding any person involved with our organisation including serious criminal offence , child protection information and disciplinary misconduct information.

Supervision , Training & Support for employees and volunteers

National Principles 5 and 7

Training and education is important to ensure that everyone at Activ8 Mind understand that child safety is everyone's responsibility. 'Our organisational culture aims for all directors, employees, contractors and volunteers, families, children and young people to feel confident and comfortable in discussing any allegations of harm or risk of harm to children or young people or child safety concerns.

We train our people to identify, assess and minimise harm.

Staff and contractors who provide professional/ therapeutic services are required to complete the RRHAN- Responding to Risk of Harm, Abuse and Neglect – Masterclass Version (4 hours) every 3 years

All other staff / volunteers eg: administration / marketing / non service providing are required to complete the RRHAN Responding to Risk of Harm, Abuse and Neglect – Fundamentals version (2 hrs) every 3 years.

Activ8 Mind also support our employees, contractors and volunteers through ongoing supervision to develop their skills to protect children / young people from harm and to promote the cultural safety of indigenous, culturally and linguistically diverse backgrounds and the disabled.

New employees to the organisation will be supervised regularly to ensure they understand Activ8 Mind's commitment to child safety and that everyone has a role to play in protecting children/ young people from harm. This will include checking that their behaviour towards children / young people is safe and appropriate (refer to Activ8 Minds Childs Safe Environments Code of Conduct) for information about appropriate behaviour. Any inappropriate behaviour will be reported through appropriate channels.

In addition, and due to the large volume of services which Activ8 Mind provide under the NDIS, all new staff are required to undertake the mandatory NDIS online training via the NDIS Commission which includes the *Worker Orientation Module + Supporting Effective Communications Module + New worker NDIS Induction Module*

All Activ8 Mind employees, contractors and volunteers are required to review these policies annually and sign the Policy Register of Review

Identification , reporting & responding to harm or risk of harm

National Principle 6

Legal Responsibilities

Activ8 Mind takes its legal responsibilities serious, including

Failure to disclose & mandatory reporting ; where there is reasonable belief that a child/ young person has been or is at risk of harm, we are required to disclose this and comply with mandatory reporting expectations

Failure to protect; people within Activ8 Mind will commit an offence if they know of a substantial risk to a child/ young person and have the power or responsibility to reduce to remove the risk but negligently fail to do so

Reportable conduct; the head of Atctiv8 Mind must be made aware of any allegation of physical and sexual abuse , sexual misconduct, significant emotional or psychological harm or significant neglect by an employee, contractor or volunteer towards a child or young person following a report having already been made to authorities as per below.

Duty of care: If a child / young person is harmed by an individual associated with Activ8 Mind we are presumed to have breached duty of care unless it can be proven that reasonable precautions were taken .

Reporting requirements

As per the Child and Young Person (Safety) Act 2017 , mandated notifiers in our organisation are the following :

- Psychologists
- Social Workers
- All employees or volunteers in an organization that provides health, welfare services and who provides services directly to children or 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
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Mandated notifiers, including health care and mental health professionals, have a legal obligation under the Children and Young Persons (Safety) Act 2017 - Chapter 5 , to notify the Child Abuse Report Line (131 478) as soon as practicable if they suspect on reasonable grounds that a child is or may be at risk of harm, if a child or young person is suspected to be at risk of immediate harm the police should be contacted on 000. All Activ8 Mind staff are encouraged to report, even if they are not a mandated notifier, if they are concerned about the safety and wellbeing of a child or young person.

The person who identifies the harm is the person to make the report to CARL by phoning 13 14 78 / SA Police Following a report to CARL/ SAPOL, an internal report is also required

When reporting to CARL, the following information will be requested

- Full name of child
- Details of siblings and parents
- Date of birth or Age
- Current address and contact details
- School
- Ethnicity
- Alleged perpetrators name , age , address, relationship to the child/ young person
- Details of when next expected contact will be
- Notifiers contact details, relationship with the child/ young person and frequency of contact

Notifications should be made if the notifier has reasonable grounds to be concerned for the child or young person's safety including:

- Observations of the child/ young persons behaviour and/or injuries causes you to suspect the child has been, or is at risk of, harm
- When a child/ young person states they have been harmed
- When a child/ young person states someone they know has been harmed (may be referring to themselves)
- Observations of the behaviour of a child/ young person or their adult caregivers causes you to suspect the child is at risk of being harmed
- When a person who is in a position to provide reliable information (i.e. relative or friend of the at risk child) reports the child/ young person has been, or is at risk of, harm

Incident types	Behavioural indicators and physical signs
Physical abuse	• Bruises in unlikely places (face, back, ears, hands, buttocks, upper thighs and soft parts of the body) • Inconsistent or absent explanation of 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.
Sexual abuse	• Genital injuries • Bite marks • Sexually transmitted diseases • Persistent soiling or bed wetting • 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 • Wary of physical contact with others • Unusually fearful of having their nappy changed
Emotional Abuse	• Avoiding home (particularly if abuser is in the family home) • Running away or continually staying at friends' houses • Fear of the dark, not wanting to go to bed, bedwetting or nightmares • Lying or stealing • Lack of trust in adults
Incident types	Behavioural indicators and physical signs
	• Poor self-image/self-esteem, poor academic performance, poor peer relationships • Secretive, demanding or disruptive behaviour
Neglect	• 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

When harm has been caused by an employee, contractor or volunteer of Activ8 Mind, that person will be removed from working with children / young people until such time as the authorities have concluded their investigation. Activ8 Mind employees, contractors and volunteers understand that after making a report the child or young person and their family may require additional support and will refer to appropriate support services including, but not limited to; Kids Helpline/Youth Helpline, Mental Health Triage and community support services.

Activ8 Mind employees, contractors and volunteers are encouraged to access additional supervision if they suspected a child is at risk of harm, if they are required to make a report to CARL or following a report to CARL. Supervision is provided by the Practice Lead or General Manager.

Reporting & responding to general complaints or feedback

National Principle 6

Activ8 Mind are committed to providing high quality services. We value our customers feedback and see it as an opportunity to improve our business operations.

When a customer lodges a complaint or provides feedback we will promptly acknowledge their message and investigate the issue thoroughly. Our team will work to resolve the matter as quickly as possible and we will keep the customer / complainant informed of progress and the outcome.

Activ8 Mind take all complaints / feedback seriously and use this information to identify any areas for business and service improvement, striving to learn from every interaction and to use feedback to improve the service experience.

Customer Feedback

The feedback derived from our customers & clients enables an informed and committed approach to continual improvement in all levels of organisational operations, systems, and service delivery.

Feedback relating to the reinforcement of best practice is registered in the Feedback Register on the database. Further to this we procure feedback on an annual basis, when there is an internal change in practitioner and upon cessation of service. Part of the feedback procured focuses on aspects of the child safe environments policy and in particular how well we have upheld our commitment to provide a service which fosters safety, wellbeing and participation

Additional to this, on an annual basis formal feedback is sought from referring customers (these may be people such as DCP, OPA, support coordinators, education staff etc). The information obtained through this feedback assists with assessing our achievements in service delivery, and, where required, in developing improvement strategies.

Complaints Management

It is recognised that feedback may come in various forms and sources, and at times it is in the form of a complaint. Activ8 Mind recognises that complaints are an opportunity to review the systems and delivery of services that may have led to the complaint. An effective complaints management system enables the development of improvement strategies in both systems and delivery of services within the organisation.

Complaints are further seen by the organisation as an opportunity to directly address immediate issues and assist in the development of preventative measures to limit likelihood of reoccurrences of the cause for the complaint. Complaints registered may be in relation to privacy and confidentiality issues, grievances, personal information handling practices, and they may be received from external customers or internally within the organisation.

The development of an organisational culture in which complaints are to be seen as an opportunity to address areas of improvement either on an individual or organisational level is important to Activ8 Mind. To assist in the development of this culture staff are provided with the organisation's philosophy regarding complaints management.

Complaints or notifications regarding breach of our Code of Conduct can be lodged in several ways:

- Verbally
- Completing the feedback form which is available upon request, via email to our administration team info@activ8group.com.au and via our website
- By calling Activ8 Mind on 1300 575 329

Any complaints received by the organisation are acknowledged as per the 'Dealing with Complaints Procedure' which outlines that:

- All complaints are considered in an equitable manner.
- The person receiving the complaint records the complaint, it is reviewed and escalated to the most suitable supervisor who will be responsible for complaint management and resolution
- He/she gathers further information and seeks to contact the complainant via phone
- The complaint is summarised and noted in Activ8 Minds feedback register
- Further follow up and resolution

- Complaints are tabled in management meetings with any systematic breaches reviewed and corrective measures recorded.

Risk Management

National Principle 8

Activ8 Mind seek to protect children / young people when harm or risk of harm has been identified which we proactively do. We have risk management strategies in place to identify, assess and take steps to minimise harm

All Activ8 Mind employees, contractors and volunteers upon induction and at regular intervals throughout their engagement with the organisation are provided the opportunity to review our policies and procedures including procedures detailing risk management, incident reporting and our policies on privacy & dignity, violence, abuse, neglect & exploitation (VANE). All Activ8 Mind employees, contractors and volunteers are required to review these policies annually and sign the Policy Register of Review.

In addition to the noted risks below details of what may constitute a risk of harm or actual harm to a child / young person has been included in Subsection "Reporting Requirements" in policy and covers behavioural indicators of physical, sexual, emotional abuse and neglect.

IDENTIFIED RISK	ACTIONS TO MINIMISE
<i>Culture of organisation is not child-safe focused</i>	• child focused Code of Conduct is in place that sets the behavioural standards expected including what happens when a breach occurs • culture of management reflects our strong commitment to the safety of children and young people • the National Principles for Child Safe Organisations are embedded in policies and procedures 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)
<i>Organisational staff (including employees, volunteers, students, contractors etc) harm children/young people</i>	• recruitment processes including undertaking 2 referee checks to ensure the suitability of persons before they are employed/volunteer with our organisation • interview questions (no prior preparation) should gauge an applicant's understanding of child safe principles and actions that would be taken to prevent harm to children and young people • ALL organisational staff have WWCC with 'not prohibited' result prior to working with children and young people • WWCC's updated every 3 years and status remains as not prohibited • children and young people and their families are provided with an outline and details of where/ how to access our policy. a copy of our Child Safe Environments policy and complaints and feedback process as part of a welcome/induction pack
<i>Organisational staff (including employees, volunteers, students, contractors etc) do not understand their obligations to report harm and risk of harm to the Child Abuse Report Line (or SA Police if child/young person is at immediate risk)</i>	• all organisational staff must abide by the child safe environments policy and Code of Conduct (latter is signed on commencement with • All health and human service professionals within our organization have completed RAN training to the required level organisation)
<i>Physical contact</i>	• 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

<i>Online communications</i>	• cyber safety and social media guidelines are in place and provided to all organisational staff • appropriate supervision is provided for all online activities if undertaken to comprise the therapeutic service • organisational staff must not communicate with children or young people via social media
<i>Transport of children and young people</i>	• organisational staff, contractors/ volunteers must NOT transport a child or young person unless specifically approved •
<i>Taking images of children and young people</i>	• • Images of children/ young people will be taken in very rare circumstances and only with the 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 • images must be presented in a way that de-identifies the child or young person
<i>Physical environment</i>	• 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
<i>Privacy and confidentiality</i>	• all documents containing confidential information will be immediately scanned to the secure case manager database which restricts access across the organistaion. • organisational staff must not disclose information regarding any child or young person without written consent of the child, young person and their parent/guardian

Related Policies and Procedures

National Principle 9

[Ch2.6 Code of Conduct Policy](#)

Policy review

National Principle 9

At Activ8 Mind we believe in continuous improvement and transparency in our policies and procedures. To ensure this we have implemented a bi-annual review mechanism where all policies and procedures are reviewed and evaluated for their relevance, effectiveness and compliance with legal and ethical standards

The review process involves gathering feedback from stakeholders including employees, clients and partners. This feedback is analysed to identify areas of improvement and to make necessary changes.

Any fundamental changes to our policies and procedures are communicated to all relevant stakeholder through written communication and internal team meetings. In the instance of a major change, additional staff training is provided.

Activ8 Mind understand that policies and procedures play a crucial role in the success of our organisation and we are committed to ensuring that they are up to date, effective and in compliance with all legal and ethical standards.

The next review of this policy is August 2023

In alignment with the Children Young People (Safety) Act (S115) a new compliance statement will be lodged upon any updates or changes to this policy.