

Cliff Top Health Centre Child Safe Environment Policy

November 2023

1. PURPOSE

This child safe environment policy confirms the commitment of the management and all staff at Cliff Top Health Centre to establishing and maintaining a child safe and child friendly environment.

2. CONTEXT

This policy reflects our commitment to provide a safe environment where every child and young person has the right to be treated with respect and is safe and protected from harm and risk of harm. This applies to all children and young people, regardless of their race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability/attributes and religious beliefs.

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

3. SCOPE

This child safe environment policy applies to all staff at Cliff Top Health centre including management, employees, and contractors. It also applies to all parents, carers, children and young people attending Cliff Top Health Centre. All staff at Cliff Top Health Centre must also agree in writing to accept this policy.

4. COMMITMENT TO CHILD SAFETY

All children and young people who come to Cliff Top Health Centre have a right to feel and be emotionally and physically safe from harm and risk of harm. We are committed to the safety and wellbeing of all children and young people using our services.

We fully support the rights of every child and will act to ensure a child safe and friendly environment is created. We also support our staff and contractors to maintain this safe and secure environment for all our clients.

5. PARTICIPATION

We value and respect the views of children and young people who use our services. We clearly communicate using age and developmentally appropriate language. We educate children and young people on their rights. We listen to and act upon, any concerns, disclosures, feedback or complaints that children, young people, parents or carers raise with us. New children, young people and their families are made aware of our *Feedback and Complaints Form* which is available upon request from our reception staff, and is a way in which children and their parents/carers can give feedback or report any concerns

6. COMMUNICATION

Our child safe environment policy and Code of Conduct is available upon request, and children, young people and their families are informed of this at their first appointment at the clinic. The policy is also available on our website at www.clifftophealth.com.au. Staff and contractors are given a copy of the Child Safe Environments Policy on commencement of employment, and are asked to sign a written statement indicating they have read and will accept and act on the policy. We retain a copy of all signed statements. Cliff Top Health Centre will ensure that everyone to whom this policy applies is aware of and has had an opportunity to read the policy.

7. RECRUITMENT PRACTICES

We take all reasonable steps to ensure that we engage the most suitable and appropriate people to work with all our patients including children and young people. Our recruitment process includes interviews with behavioural questions in relation to child safeguarding and conduct at least 2 referee checks on all prospective employees and contractors.

We require all Cliff Top Health Centre staff and contractors who are working with children as set out in Child Safety (Prohibited Persons) Act 2016, to have a valid, Not Prohibited Working with Children Check issued by the Screening Unit of the Department of Human Services. We will verify the accuracy of the WWCC before they commence employment. This will need to be renewed every five years. For existing employees, we will verify they renew their Working with Children Check every 5 years and the status remains as not prohibited. Verification will be done online through the Organisation Portal via the DHS Screening Unit. The cost of any screening and checks for current staff will be covered by Cliff Top Health Centre. Future employees/contractors will need to undertake and pay for their child safe clearance themselves before beginning employment.

We will advise the Department of Human Services Screening Unit if we become aware of certain information regarding any person involved with Cliff Top Health Centre, including any serious criminal offence, child protection information, or disciplinary or misconduct information.

In the event that an employee or applicant is not willing to consent to a DHS Screening, or does not have a valid DHS Screening, Cliff Top Health Centre will preclude the individual from working with children and young people.

This Practice may also at its discretion seek a statutory declaration for any employee(s), contractor(s) or volunteer(s) who have been citizens or permanent residents of another country other than Australia since turning 18 years of age.

8. CODE OF CONDUCT

The staff, contractors, and patients at Cliff Top Health Centre are bound by a code of conduct. All employees and contractors must read, agree to follow and sign the Cliff Top Health Centre Code of Conduct for a child safe organisation (See attached Code of Conduct Appendix A).

All patients to the clinic, including parents, children and young people are made aware of the code of conduct at their first visit to the clinic through the New Patient Information Forms they fill out and sign. The code of conduct is an appendix to this policy which is on our website at www.clifftophealth.com.au and can also be provided on request at the front reception.

A breach of the code of conduct can be reported via the following methods:

- our feedback box located in reception
- via post at 47 Cliff Avenue, Port Noarlunga South, 5167
- via email to admin@clifftophealth.com.au
- Directly to the admin staff or practitioners

A suspected breach of the code of conduct by people involved in this organisation will be considered seriously to prioritise the safety and protection of children and young people. If it is a serious breach, a mandatory report will occur.

According to the Code of Conduct, all employees and contractors at Cliff Top Health Centre will:

- Treat everyone with respect and honesty (this includes staff, volunteers, students, children, young people, parents and caregivers) regardless of their race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs. All people are valued, respected and treated equally.
- Remember to be a positive role model to children and young people in all your conduct with them
- Set clear boundaries about appropriate behaviour between yourself and the children or young people present or being treated in the Practice.
- Seek the consent of the child, young person and their parents or guardians particularly where treatment requires physical contact
- Ensure children and young people understand their rights and explain to the child or young person in age-appropriate language what they can expect during the consultation, particularly where treatment

involves physical contact.

- Be aware and responsive to the particular needs and vulnerabilities of children and young people (such as age, language barriers, developmental capabilities, disability, mental health, trauma or harm).
- Ensure that where diagnosis or treatment requires an image of a child or young person to be taken, the child, young person and their parents or carers (where applicable) clearly understand the way the image will be used. Permission must be obtained before any images are taken.
- Follow the Practice Child Safe Environment Policy and guidelines for the safety of children and young people.
- Raise any concerns, problems or issues with management as soon as possible.
- Record and act quickly, fairly and transparently on complaints made by a child, young person or their parent/guardian.
- Notify the Child Abuse Report Line on 13 14 78 as soon as practicable if staff have a reasonable suspicion that a child or young person has been or is being harmed or at risk of harm .
- All employees/contractors will **NOT**:
 - Take part in any unnecessary physical contact with a child or young person
 - Discriminate against any child or young person because of age, gender, cultural background, religion, vulnerability or sexuality.
 - Develop any 'special' relationships with children or young people outside of the professional relationship

9. SUPPORT FOR STAFF

Cliff Top Health Centre seeks to attract and retain the best staff and practitioners. We provide support and supervision so people feel valued, respected and fairly treated. We ensure that employees and contractors who work with children have ongoing support and training to understand our organisation's child safe policy, their mandatory reporting obligations, how to build culturally safe environments and their responsibilities to create a child safe and friendly environment. Our strategies include:

- ensure all workers read and understand the Mandatory Notification Information Booklet available at: https://dhs.sa.gov.au/_data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF during induction
- complete "Safe Environments: Through their Eyes" training every 3 years

All chiropractors need to comply with mandatory professional development regarding child safety and protection, and abide by the APHRA Code of Conduct.

10. REPORTING AND RESPONDING TO SUSPICION OF A CHILD BEING HARMED OR AT RISK OF HARM

Cliff Top Health Centre will not tolerate incidents of children being subject to inappropriate behaviour, placed at risk or experiencing harm. All our staff and contractors are mandated reporters, and understand their legal obligation to notify the Child Abuse Report Line 13 14 78 as soon as practicable if they have a reasonable suspicion that a child has been, or is being, abused or neglected. SA police are to be called on 000 if the child is at immediate risk. In cases involving Aboriginal children and young people, support is provided by Yaitya Tirramangkotti - an Aboriginal team, via the CARL number.

Non-mandated notifiers are encouraged to make voluntary reports about harm or risk of harm to a child or young person.

The individual who identifies the harm or risk of harm is the person who makes the report to CARL/SAPOL and this is not reported internally for another staff member to determine if it is a reportable matter.

Following a report being made to CARL or SAPOL, workers must also make an internal report to Cliff Top Health Centre management. We will be guided by the Department for Child Protection and/or SAPOL after a report has been made as to whether we can conduct an internal investigation. We will document all information received regarding the report and store this securely in a separate file.

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

In addition, all adult staff and contractors of Cliff Top Health Centre have a legal obligation to:

- report child sexual abuse to the police and
- to protect a child from sexual abuse
- failure to meet these obligations may be considered a criminal offence (Criminal Law Consolidation Act 1935 (s.64A & s.65))

We ensure that staff have access to relevant information resources available from the Department for Child Protection, including:

- Mandated reporters or notifiers and their role
<https://www.childprotection.sa.gov.au/reporting-child-abuse/mandated-notifiers-and-their-role>
- Reporting suspected harm of children and young people:
<https://www.childprotection.sa.gov.au/reporting-child-abuse/report-child-abuse-or-neglect>

This Practice recognises that even where a report is made, we may still have a role in supporting the child or young person by referring the child/young person and their family to other appropriate services, continue to provide a service and monitoring their circumstances. We ensure that support is also available for the staff member making the report, particularly where an ongoing service is provided to the child, young person and their family.

Employees and contractors must also report to management any reasonable suspicion that a child has been harmed, or is being, abused or neglected by another staff member. We recognise that all our employees and contractors have a duty of care to report any concerns about the behaviour of another employee to management.

11. STRATEGIES TO MINIMISE RISK

Cliff Top Health Centre provides the assessment and management of musculoskeletal problems for all age groups. To help maintain a safe environment for children, we receive guidance from our regulatory bodies and implement these strategies to minimise and manage these risks.

This practice takes steps to minimise the risks to children or young people due to the actions or omissions of staff, contractors, or other people within our practice. We review our risks regularly to address any new or emerging risks in order to maintain a safe environment for children and young people.

Strategies we have implemented to minimise and control risks to children and young people include:

- Awareness of high risk situations which are referred to in our code of conduct (see Appendix A)
- All staff are required to abide by this practice's child safe policy
- Staff are made aware of and are responsive to the particular needs and vulnerabilities of children and young people (such as age, language barriers, developmental capabilities, disability, mental health, trauma or harm)
- Practitioners provide clear age-appropriate or developmentally appropriate explanations to children and young people about the consultation and allow for questions prior to examination.
- This practice responds to any concerns that children, or their families or carers raise, quickly and fairly.
- This practice ensures that patient records are securely managed and stored in accordance with practice policy and relevant legislative requirements.
- In some cases, children with a history of significant abuse or neglect may display signs of developmental trauma as a consequence of the previous abuse and/or neglect. Staff are aware that in these cases, additional care may be required to the child and their parent/carer the normal treatment procedures, which may include the need for practitioners to request the child to allow close physical contact as part of the examination and/or treatment

Evaluation of these strategies and the development of additional strategies to minimise and control risks to children and young people occurs as part of our ongoing risk management process.

Responsibilities for all Staff

It is a requirement that children need to have a guardian/carer/parent with them during assessment and treatment by practitioners.

Children who are over 16 but under 18 years of age will have a guardian/carer/parent with them during assessment and treatment, unless a signed permission is granted by the parent/guardian.

In the event a guardian/carer/parent cannot be in attendance with a child, they will be asked to reschedule their child's appointment for a time when they can be present.

The Waiting Room

Cliff Top Health Centre has a reception area which is within clear sight of admin staff. Children are not to be left unattended in the reception area while parents/guardians/relatives seek treatment. They are to join their care-giver during treatment and are instructed not to touch any of the equipment and to stay clear of the electric treatment tables.

Restricted Areas

Staff only areas, the kitchen area, back office room and reception desk area are out of bounds for all children.

Electric Treatment Bed

No child must play under the treatment beds during the course of a carer/parent or relative seeking treatment.

High crush forces on electric descent of the bed could cause serious injury or death. This rule is non-negotiable and if a child is not co-operating, then the treatment should be ceased and the patient invited to make another appointment without the child in attendance.

11. COMPLAINTS PROCEDURE

Providing opportunities for complaints and feedback ensures that children, young people and their families feel valued and respected and enables us to improve the quality of our service. Children, young people and their families are informed at their initial appointment at the clinic that they can provide feedback or make a complaint if required. A section of the New Patient Form outlines that the feedback/complaints form is available on request.

Compliments, complaints or feedback can be provided verbally or in writing to any worker or direct to management either by telephone on (08) 8327 1911, via email at admin@clifftophealth.com.au or by post addressed to 47 Cliff Avenue, Port Noarlunga South, 5167.

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

- listen to the complaint/feedback
- the person receiving the complaint will make a record of it if received verbally
- advise of the time expected for an outcome
- if a worker receives a complaint, they must forward it to management as soon as possible
- management will respond to the complainant with an outcome within 14 days of receiving the complaint.
- clearly document and securely store decisions and actions taken in response to complaints and feedback

- make sure that procedural fairness is followed at all times.

Please note: Complaints and feedback, outside of child safety, are internal organisational matters, to be dealt with by Cliff Top Health Centre. If a complaint or feedback is received that relates to the reasonable belief that a child or young person has been harmed or may be at risk of harm then mandatory notification is required by law and will be handled as per section 10 “Reporting and Response to suspecting a child is being harmed or at risk of harm”.

12. HARRASSMENT/BULLYING

Cliff Top Health Centre opposes all forms of harassment, discrimination or bullying. We take this issue seriously and encourage anyone who believes that they or another person has been harassed, discriminated against or bullied to raise this issue with Cliff Top Health Centre management.

13. POLICY REVIEW

This policy will be reviewed at a minimum once every 5 years as required by the Children and Young People (Safety) Act 2017, or when new or added risks are identified for children or young people, or when a critical incident occurs involving a child or young person within the organisation, or concerns are raised by anyone involved in our organisation about child safety, or if compliance to child safe policy and procedure is low. A new child safe environments compliance statement will be lodged with the Department of Human Services each time we review and update our policy.

Next review date: **June 2028**

14. APPENDICES

A) Cliff Top Health Centre child safe code of conduct.

Appendix A:

Cliff Top Health Centre Code of Conduct for a Child Safe Organisation

Caring for children and young people brings additional responsibilities for our employees and contractors. In addition to the obligations placed on practitioners under AHPRA, all employees and contractors of this practice are responsible for promoting the safety and wellbeing of children and young people by:

- Adhering to our child safe policy at all times.
- Respecting that all children and young people who use our service have a right to feel and be safe.
- Treating all children and young people with dignity, equality and respect, regardless of race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs.
- Being aware and responsive to the particular needs and vulnerabilities of children and young people (such as age, language barriers, developmental capabilities, disability, mental health, trauma or abuse).
- Ensuring clear age-appropriate or developmentally appropriate explanations are provided to children and young people about the consultation and allowing for questions prior to examination.
- Seeking the consent of the child, young person and their parents or guardians particularly where treatment requires physical contact.
- Being alert to children and young people who may be at risk, and reporting suspected child abuse or neglect to the Child Abuse Report Line (13 14 78).
- Encouraging children and young people to 'have a say' on issues that impact on their care.
- Ensuring that children, young people and their families know their rights and how to access the complaints procedures available to them.
- Ensuring a physically and socially safe environment, for children and young people, that is free of any identifiable hazards.

Employees and contractors must not

- Discriminate against any child or young person because of age, gender, cultural background, religion, vulnerability or sexuality
- Develop any 'special' relationships with children or young people outside of the professional relationship.
- Take part in any unnecessary physical contact with a child or young person.

I agree to abide by this code of conduct

Name:.....

Signature:..... Date:.....