



Child Safe Policy

Purpose

All children at Thriving Kids Occupational Therapy have a right to feel safe, protected and included.

This policy is part of our organisation's ongoing commitment to protecting the children in our care from harm and abuse. It:

- outlines the child safe practices our organisation has put in place to minimise the risks to child safety
- sets out what is required from staff, including volunteers and others who interact with our organisation, so they know what is expected from them to keep children safe.

Our commitment to child safety

At Thriving Kids Occupational Therapy, we commit to the safety and wellbeing of every child in our care. Please read our Statement of Commitment to Child Safety, which is available on our website www.thrivingkids.com.au and is displayed in our waiting room.

Our organisation ensures services and activities are inclusive of all children, including children with diverse needs.

Scope and audience for this policy

The policy describes what is required from all staff and volunteers in the organisation when taking part in any activities, services and events that involve children.

Responsibilities for children's safety

Everyone in our organisation is expected to carry out the requirements specific to their role to keep children safe. This includes:

- upholding our organisation's commitment to child safety
- reading, signing and upholding the behaviours set out in our Child Safe Code of Conduct
- meeting requirements across all other child safe policies and procedures, including child safe recruitment practices and risk management
- taking part in our regular reviews of our child safe documents
- reporting all breaches of our policies or any allegations of child harm or abuse, and meeting all external reporting obligations

- completing all child safe training.

Please contact Belinda van Wel with any of your child-safety related questions or concerns.

Active participation of children, families and communities

- All our child-related policies and procedures are easily accessible on our website and offline for everyone who accesses our services and events, including children, parents, carers and community members.
- Children, parents and carers from diverse backgrounds and circumstances are encouraged to provide feedback on our child-related policies and procedures, including our Child Safe Code of Conduct that describes acceptable and non-acceptable behaviours and our Child Safe Risk Management Plan.
- We provide opportunities for children to provide feedback to their treating therapist on what makes them feel safe, supported and included.

Definitions of harm and abuse

General definitions

Psychological abuse (also known as emotional abuse)

This includes bullying, threatening and abusive language, intimidation, shaming and name calling, ignoring and isolating a child, and exposure to domestic and family violence.

Physical abuse

This includes physical punishment, such as pushing, shoving, punching, slapping and kicking, resulting in injury, burns, choking or bruising.

Sexual abuse

This includes the sexual touching of a child, grooming, and production, distribution or possession of child abuse material.

Grooming

This is a process where a person manipulates a child or group of children and sometimes those looking after them, including parents, carers, teachers and leaders. They do this to establish a position of 'trust' so they can then later sexually abuse the child.

Misconduct

This is inappropriate behaviour that may not be as severe as abuse, but could indicate that abuse is occurring and would often be in breach of an organisation's Child Safe Code of Conduct. This could include showing a child something inappropriate on a phone, having inappropriate conversations with a child or an adult sitting with a child on their lap.

Lack of appropriate care

This includes not providing adequate and proper supervision, nourishment, clothing, shelter, education or medical care.

Reportable allegation

An allegation that the employee has engaged in conduct that may be reportable conduct, whether or not the conduct is alleged to have occurred in the course of the employee's employment with Thriving Kids Occupational Therapy

Reportable conduct

The following conduct, whether or not a criminal proceeding in relation to the conduct has been commenced or concluded—

- (a) a sexual offence,

- (b) sexual misconduct,
- (c) ill-treatment of a child,
- (d) neglect of a child,
- (e) an assault against a child,
- (f) an offence under section 43B or 316A of the *Crimes Act 1900*,
- (g) behaviour that causes significant emotional or psychological harm to a child.

What the policy covers

Transporting children

Thriving Kids staff are not to transport children within the course of their work. Staff may ride as an additional passenger whilst child is being transported by their parent or caregiver, to provide consultative input relating to travel.

Social media use and online communication

Staff and volunteers must never communicate privately with children online or on social media. Any necessary online communication should include the child's parent or carer in the correspondence.

Photography and the use of images

Photos and videos of children can only be taken with the permission of parents or carers. Parents and carers must also approve any images used on our social media channels. It is unacceptable for staff or volunteers to take photos or videos of children, other than their own, on personal devices, or to share images without permission. Thriving Kids tablet is to be used for any photography or recording within sessions. Photos/videos should be uploaded to client file immediately after session then deleted from the tablet (including deleting from bin/recently deleted)

Physical contact

Physical contact with children should be kept to a minimum. Everyone involved in the organisation is expected to have healthy physical boundaries with children. Where toileting support is required, parent or caregiver should be encouraged to observe supports where possible.

Gifts and benefits

Staff and volunteers must never give gifts to children, or bestow benefits of any kind to a child, unless they have direct permission from the child's parents or carers.

Secondary employment

Staff members must declare any secondary employment and make sure there are no conflicts of interest associated with the employment.

Staff and volunteers are not allowed to babysit children in our care.

Out of hours contact with children

Staff and volunteers must let us know about any out-of-hours contact they have with children in our care. It is unacceptable for staff or volunteers to participate in the lives of children outside the organisation without a valid reason. Professional boundaries with the children in our care must be maintained at all times.

Illness and injury management

Injuries must be reported to the first aid officer on duty and first aid administered in a safe space within lines of sight of other adults.

Therapy Assistants

Therapy assistants must work under the supervision of an additional adult, which can be either their supervising therapist or the client's parent/ caregiver. Parents/ caregivers must be advised that their presence is required for therapy assistant run sessions. Parents/ caregivers are encouraged to observe sessions delivered by all treating therapists where possible.

Reporting requirements for different types of concerns or incidents

What to Report:

All complaints should be reported. This includes:

- criminal conduct
- risk of significant harm (ROSH)
- disclosures of abuse
- unacceptable behaviour around children and young people that breaches our Child Safe Code of Conduct
- suspicion of harm or abuse to a child or young person
- reportable conduct.

Who can Report:

Everyone in our organisation has the right to make a genuine complaint and won't be punished if they do.

This includes children and young people, family members, staff members and volunteers.

Reporting abuse is mandatory and encouraged – it is never obstructed or prevented.

Reporting criminal conduct

Contact **NSW Police on 131 444** for anything you consider could be a criminal offence. This includes sexual assault, physical assault, grooming offences, and producing, disseminating or possessing child abuse material.

Note: It is a criminal offence for adults not to report to police if they know or believe that a child abuse offence has been committed. In addition, people employed in child-related work may be subject to a criminal offence if they fail to reduce or remove the risk of a child becoming a victim of child abuse.

Reporting risk of significant harm

Any person who has reasonable grounds to believe that a child or young person is at risk of significant harm (ROSH) can report to the **Department of Communities and Justice (DCJ) on 132 111** (this is a 24-hour service).

Mandatory reporters must report to the [ChildStory Reporter Community](#) if they have reasonable grounds to suspect a child is at ROSH.

Reporting allegations and convictions

Relevant entities must notify the Office of the Children's Guardian of reportable allegations or convictions (that is, reportable conduct). This includes sexual offences, sexual misconduct, ill-treatment of a child, neglect of a child, an assault against a child, failure to protect a child or failure to report if a child has been harmed, as well as any behaviour that causes significant psychological harm to a child.

Reporting breaches of our Child Safe Code of Conduct

All complaints must be reported to our director, Belinda van Wel.

Risk Management Process

To ensure the immediate and ongoing safety of the child:

- establish the welfare and safety of the child and take steps to ensure the child is removed from the risk
- reassure them and remain calm
- listen carefully without interrupting
- don't ask leading questions or any additional questions once you've established there is a genuine concern (to not compromise future investigations by NSW Police or DCJ)
- support them, reassuring the child that they have done the right thing, that you believe them and that the abuse is not their fault
- explain what will happen, including timeframes, where known
- don't make promises you can't keep
- don't confront the alleged perpetrator
- seek guidance if you are unsure about what to do.

It is the role of the director, acting as child safety officer, to conduct a risk assessment after receiving an allegation, to ensure the safety of all people involved and maintain the integrity of the investigation.

Procedural Fairness

Any allegation of abuse will be treated in a fair, transparent and timely manner. Workers subject to an allegation will be notified when a disciplinary hearing will take place and what will occur at the hearing. We follow the obligations defined under the *Privacy Act 1988* (Commonwealth), and relevant reportable conduct investigations are conducted with the OCG's Reportable Conduct Directorate.

Additionally:

- all information is recorded on our reporting form for complaints and allegations
- all reporting forms for complaints and allegations are stored securely and only accessed by those in the organisation with responsibility for oversight of the investigation
- information may be exchanged under Chapter 16A of the *Child and Young Persons (Care and Protection) Act 1998*, with other agencies who have responsibilities relating to the safety, welfare or wellbeing of children or young people
- our organisation maintains the privacy of those involved in accordance with our obligations under the *Privacy and Personal Information Protection Act 1998*

if an incident is found to be substantiated, likely outcomes or responses will be determined by HR or from advice given by relevant authorities (police, DCJ or OCG).

Complaints Process

Once a complaint has been made, use this step-by-step process to make sure it's appropriately followed up:

- steps taken to remove child from harm
- incident recorded
- reporting obligations met, if necessary
- investigation conducted, keeping everyone involved up to date with what's happening
- offering ongoing support to the child as needed

reviewing the incident and updating the organisation's child safe policies, if necessary.

Other related child safe documents

Thriving Kids Occupational Therapy has a range of other key documents that relate to child safety. These include:

Statement of Commitment to Child Safety

Our public commitment to prioritising child safety across our organisation.

Child Safe Code of Conduct

Guides the day-to-day behaviours of adults interacting with children at the organisation.

Child Safe Recruitment, Induction and Training Policy

Sets out what is involved in the recruitment process and the procedures to be followed before a person is considered for a role at the organisation. This includes the verification of their Working with Children Check. It also outlines what is involved in the induction process for new recruits and any further training requirements.

Child Safe Risk Management Plan

Describes the specific risks at the service that could affect children's safety and identifies the protective strategies used to lower each risk.

Publication, communication and engagement

Our Child Safe Policy and other child safe documents can be found on our website at www.thrivingkids.com.au. Anyone involved in our community can request a copy via email at any time and we invite feedback at any time.

Related legislation, regulations and standards

Thriving Kids Occupational Therapy has to understand and comply with a number of NSW child protection laws and schemes. These include:

- NSW Child Safe Scheme
- *Children's Guardian Act 2019*
- *Child Protection (Working with Children) Act 2012*
- Child Protection (Working with Children) Regulation 2013
- *Children and Young Persons (Care and Protection) Act 1998*

Next review date

31st January 2027 or earlier if there are any critical incidents
