



Adelaide City  
General Practice

# Child Safe Policy

Reviewed – Nov 2023

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## 1. Commitment to the Safety of Children and Young People

Adelaide City General Practice is committed to providing a safe environment to all children and young people. Our policy complies with the Children and Young People (Safety) Act 2017, the Child Safety (Prohibited Person) Act 2016 and aligns with the National Principles for Child Safe Organisations. These documents are available to all staff.

We value and respect children and young people and welcome them regardless of their abilities, sex, gender, or social economic or cultural background. Bullying, harassment and discriminatory practices will not be tolerated.

The safety and well-being of all children and young people accessing our services will always be our first priority.

All children and young people who come to Adelaide City General Practice have a right to feel and be safe. Everyone within our organisation has a role to play in ensuring a safe environment for children and young people.

## 2. Scope of Policy

This policy applies to all persons working within Adelaide City General Practice including:

- employees (permanent and casual)
- contractors
- medical students
- indirect service providers

*Note: In this policy, the term “worker” is intended to cover all persons occupying any position listed above.*

This policy forms part of the induction of all new employees and as part of their employment conditions, all new employees are required to agree in writing to accept and act in accordance with the policy.

## 3. Communication

A copy of this policy is available to children, young people and their families on our website and on request.

This Child Safe Policy is available to all workers. It forms part of the induction for all new staff members.

Adelaide City General Practice encourages and respects the views of children and young people who access our services. We listen to and act upon any concerns that children, young people or their families raise with us. We ensure that children, young people and their families know their rights and how to access the complaints procedures available to them.

We provide clear age-appropriate or developmentally appropriate explanations to children and young people and allow for questions during consultation and treatment. We involve children and young people in decision-making as appropriate.

## 4. Code of Conduct

Everyone covered by the scope of this policy is aware of, and must abide by the organisation's child protection Code of Conduct.

### Code of Conduct – Child Safe Environments

Caring for children and young people brings additional responsibilities for practitioners and employees of Adelaide City General Practice.

In addition to the obligations placed on practitioners under their professional codes of conduct, all employees and workers of this Practice are responsible for promoting the safety and well-being of children and young people by:

- adhering to the organisation's child safe policy at all times and taking all reasonable steps to ensure the safety and protection of children and young people
- treating everyone 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 conduct with them
- setting clear boundaries about appropriate behaviour between yourself and children and young people – boundaries help everyone to understand their roles
- listening and responding appropriately to the views and concerns of children and young people
- being alert to bullying behaviours and responding promptly and appropriately
- where appropriate, ensuring another adult is always present or in sight when conducting one to one consulting, coaching, instruction or other activity
- being alert to children and young people who have been harmed, 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 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.

Workers must not:

- 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.

Breaches or suspected breaches of the Code of Conduct should be reported as soon as practicable to management either in person, by telephone on 8410 1322, or via email at

sophie@acgp.com.au. Breaches or suspected breaches of the Code of Conduct will be taken seriously and dealt with quickly, fairly and transparently.

Any worker who breaches the Code of Conduct will face disciplinary action and depending on severity of the breach, the worker may have their employment terminated.

## 5. Recruitment practices

Adelaide City General Practice takes all reasonable steps to ensure that it engages the most suitable and appropriate people to work with children and young people. We have the following recruitment practices in place:

- position descriptions that include our commitment to child safety and wellbeing
- written applications from applicants
- face-to-face interviews that use behavioural questions to determine the applicant's knowledge of child safeguarding
- referee checks and qualification checks.

In accordance with the Child Safety (Prohibited Persons) Act 2016, our organisation is registered with the DHS Screening Unit and we link all Working with Children Checks (WWCC). All employees must hold a current, not prohibited WWCC issued by the Screening Unit of the Department of Human Services, provide evidence of this prior to employment and renew this every 5 years. We will verify the accuracy of all WWCCs in the DHS Screening Unit portal as required by law.

We will immediately contact the Department of Human Services Screening Unit when we become aware of certain information regarding any person involved with our organisation, including any serious criminal offence, child protection information, or disciplinary or misconduct information.

## 6. Training, Supervision and Support for Workers

We have strategies in place to supervise, train and support workers 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:

- Training:
  - 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](https://dhs.sa.gov.au/_data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF) during induction
  - include child safety on meeting agendas
- Supervision:
  - ongoing supervision which includes a focus on child safety and wellbeing
- Support:
  - an induction process for all new workers including a copy of this policy document

- including child safeguarding in performance discussions as appropriate
- appointing a child safety officer (currently Sophie Piron, the Practice Manager) who has an educative role within the organisation.

## 7. Reporting and responding to harm or risk of harm

We aim to ensure that children and young people are safe from harm and risk of harm. Section 17 of the Safety Act defines 'harm' to mean physical or psychological harm (whether caused by an act or omission), including harm caused by sexual, physical, mental or emotional abuse or neglect.

Mandated notifiers in our organisation are workers who:

- provide services to children and young people, that is, General Practitioners and Registered Nurses.
- 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, that is, the Practice Manager.

Mandated notifiers have a legal obligation to notify the Child Abuse Report Line (CARL) on 13 14 78 as soon as practicable if they have a reasonable belief that a child or young person is or may be at risk of harm. If the child or young person is at immediate risk, report to South Australia Police (SAPOL) on 000. In cases involving Aboriginal children and young people, support is provided by Yaitya Tirramangkotti - an Aboriginal team, via the CARL number.

Even if not a mandated reporter, any person can report harm or risk of harm to a child or young person. The individual who identifies the harm or risk of harm is encouraged to make the report to authorities and can request the support from another worker to do so if required.

Information about making appropriate reports of harm or risk of harm is available from the South Australian Department of Child Protection website:

<https://www.childprotection.sa.gov.au/reporting-child-abuse>.

All adult workers (even if not a mandated notifier) 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.

Following a report being made to CARL or SAPOL workers must make an internal report to 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.

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.

Following a report to CARL or SAPOL we will support the child or young person by:

- referring the child, young person or their family to other appropriate services
- continuing to provide a service to the child, young person and their family and monitor their circumstances.

- document all information received regarding the report and store this securely in a separate file.

## **8. Reporting and Responding to General Complaints and Feedback**

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. At their first appointment, children, young people and their families are given an information flyer which provides details regarding how they can provide feedback or make a complaint. This information is also available on our practice website.

Compliments, complaints or feedback can be provided verbally or in writing to any worker or direct to management.

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 contact the complainant, discuss the complaint and work with them to achieve an acceptable outcome in line with the practice's complaints policy.
- 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.

If the child, young person or their family is not happy with the outcome from the complaints process they can contact :

- Health and Community Services Complaints Commissioner 8226 8666 or Australian Health Practitioners Regulation Agency 1300 419 495
- Australian Human Rights Commission Online: [www.humanrights.gov.au](http://www.humanrights.gov.au) Tel: 1300 656 419
- South Australian Equal Opportunities Commission (for complaints relating to discrimination) Online: [www.eoc.sa.gov.au](http://www.eoc.sa.gov.au) Tel: 08 8207 1977.

## 9. Risk Management

Adelaide City General Practice takes steps to minimise the risks to children due to the actions or omissions of employees, contractors or other people within our organisation. We review our risks regularly to address any new or emerging risks in order to maintain a safe environment for children.

Identified risk	Actions to minimise risk
Culture of organisation is not child-safe focussed	<ul style="list-style-type: none"> <li>• child focused Code of Conduct is in place that sets the behavioural standards expected including what happens when a breach occurs</li> <li>• culture of management reflects our strong commitment to the safety of children and young people</li> <li>• the National Principles for Child Safe Organisations are embedded in policies and procedures</li> <li>• 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)</li> </ul>
Organisational workers harm children/young people	<ul style="list-style-type: none"> <li>• recruitment processes including undertaking referee checks to ensure the suitability of persons before they are employed with our organisation</li> <li>• all workers have WWCC with 'not prohibited' result prior to working with children and young people</li> <li>• WWCCs updated every 5 years and status remains as not prohibited</li> <li>• children and young people and their families have access to our Child Safe Environments policy and complaints and feedback process</li> </ul>
Organisational workers don't 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)	<ul style="list-style-type: none"> <li>• all workers must abide by the child safe environments policy and Code of Conduct</li> <li>• all workers provided with a copy of the Mandatory Notification Information Book on commencement which remains available to workers at all times.</li> </ul>
Physical contact	<ul style="list-style-type: none"> <li>• any physical contact must be appropriate to the delivery of services being provided</li> <li>• 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</li> </ul>

	<p>proceeding</p> <ul style="list-style-type: none"> <li>unnecessary physical contact is not allowed</li> </ul>
Online communications	<ul style="list-style-type: none"> <li>cyber safety and social media policies are in place and provided to all workers. <i>Note: the practice does not engage in any social media activities</i></li> </ul>
Supervision	<ul style="list-style-type: none"> <li>when in common areas (eg toilets, waiting rooms) children and young people are to be supervised by parents/guardians at all times</li> <li>in the context of clinical consultations it may at times be appropriate for a child or young person to be seen in a one-to-one situation without a third-party present. This will occur with the consent of the child/young person and where relevant, the consent of a parent/guardian.</li> </ul>
Taking images of children and young people	<ul style="list-style-type: none"> <li>consent of child young person and their parent/guardian required</li> <li>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</li> <li>every endeavour will be made to present images in a way that de-identifies the child or young person unless this is not possible for clinical reasons.</li> </ul>
Physical environment	<ul style="list-style-type: none"> <li>maintain a risk register that is reviewed annually to ensure effectiveness</li> <li>conduct risk assessments for all activities</li> <li>ensure all equipment is in good working order</li> </ul>
Privacy and confidentiality	<ul style="list-style-type: none"> <li>all documents containing confidential information will be stored privately in a locked filing cabinet (or similar place with restricted access)</li> <li>digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties</li> <li>workers must not disclose information regarding any child or young person without written consent of the child, young person and their parent/guardian</li> </ul>



## 10. Related Policies and Procedures

No additional policies and procedures specifically related to Child Safe Environments apply.

## 11. Policy Review

Adelaide City General Practice will, at a minimum, review this policy and the related procedures once every 5 years as required by the Children and Young People (Safety) Act 2017. We will also review this policy when:

- new or added risks are identified for children or young people, which may require a change in the policy or procedures
- a critical incident where a child or young person has experienced harm through involvement in the organisation
- concerns are raised by anyone involved in your organisation about child safety or welfare in the organisation
- awareness or compliance to the child safe policy and/or procedures is low
- legislative changes/requirements.

Adelaide City General Practice will lodge a new child safe environments compliance statement with the Department of Human Services each time this policy is review and updated.

Policy Date: 15 November, 2023  
Reviewed by Sophie Piron, Practice Manager

Review Date: November 2028.