



# Safeguarding Children and Young People

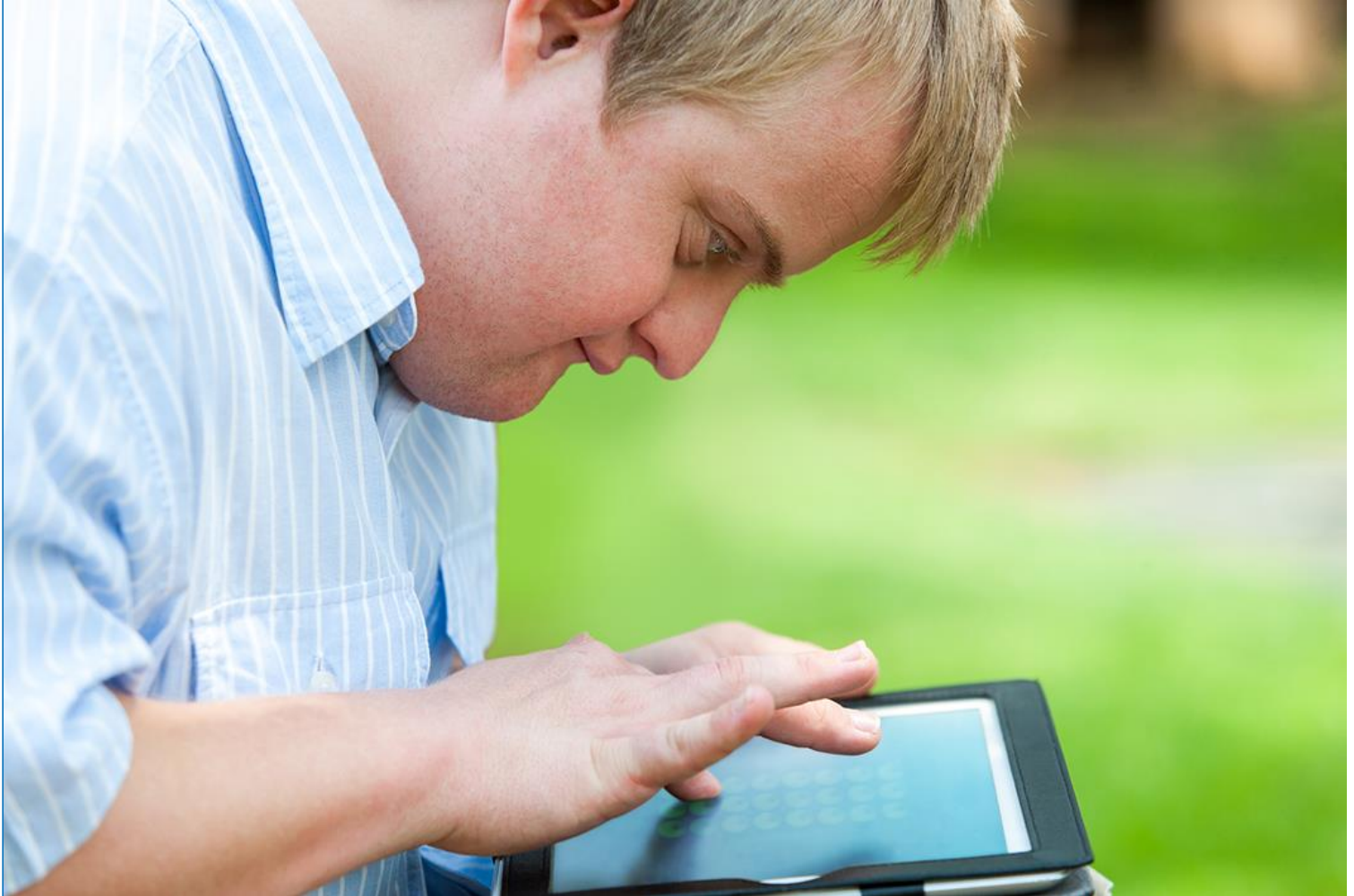
March 2023

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# 1. Risk Management Policy – Safeguarding Children and Young People



## 1.1 Statement of Commitment to Child Safety

ALARA QLD Limited is committed to child safety. As an organisation we aim to promote and protect at all times the best interest of children involved in our programs. ALARA staff and volunteers have a duty of care to provide environments that are friendly, promote learning and enjoyment and are safe for children and young people.

All children regardless of gender, race, religious beliefs, age, disability, sexual orientation, family or social background have equal rights to protection from abuse. ALARA has zero tolerance of child abuse. Everyone working or volunteering at ALARA is responsible for the care and protection of children within our care and reporting information about child abuse. All allegations and safety concerns will be treated seriously and consistently with our policies and procedures.

ALARA is committed to identifying risks early and removing and reducing those risks. The organisation has robust human resources and recruitment practices and is committed to training and educating our staff on child abuse risks. We have specific policies and procedures in place that support our leadership team, staff and volunteers to achieve these commitments.

We make this statement to child safety as we believe that the services we provide for children with a disability and their family should support and sustain family caring arrangements as well as provide an enriching experience for the children, families and communities involved. Providing safe circumstances for these services is fundamental to our organisation.

## 1.2 Aim

The aim of this policy is to ensure the protection and safety of children and young people and exploitation and abuse. This policy sets out general principles and guidelines as well as specific obligations and responsibilities.

## 1.3 Scope

This policy relates to all ALARA activities and operations that directly or indirectly involve children and young people.

This policy applies to:

- ALARA staff and volunteers (including Board Directors) who have contact with children or have access to any record relating to children.
- Contractors or Subcontractors providing services to or working with ALARA in connection with any activity which involves working with children or contact with children

ALARA will not permit any person to work with or have contact with children if that person poses an unacceptable risk to a child's safety or wellbeing.

## 1.4 Definitions

Term	Definition
<b>Abuse:</b>	<p>Abuse is the violation of an individual's human or civil rights, through the act or actions of another person or persons.</p> <p>Abuse can include any of the following four actions or behaviours by a person who has either a formal or implied bond or trust for service provision to another person. This bond or trust includes management, staff, volunteers, ALARA Board members and anyone else who has a role in service provision to a client of ALARA.</p>
<b>Assault</b> (based on the definition in the <i>Criminal Code Act 1899 - Queensland</i> ):	An act is called assault if a person strikes, touches, moves or applies any kind of force or threatens to apply any kind of force to another person directly or indirectly without the other person's consent.
<b>Client:</b>	For the purposes of this Policy, the client is defined as the primary client i.e. the person with the disability.
<b>Child:</b>	Child means a person below the age of 18years unless under the law applicable to the child, majority is attained earlier.
<b>Child Protection:</b>	Means any responsibility, measure or activity undertaken to safeguard children from harm.
<b>Contractor:</b>	An external provider contracted to provide goods or services.
<b>Emotional Neglect:</b>	Restricting the social, intellectual and emotional growth or well-being of a person.
<b>Grooming:</b>	This is a term used to describe what happens when a perpetrator of abuse builds a relationship with a child or young person with a view to abusing them at some stage.

Term	Definition
	Grooming can take place in any setting where a relationship is formed including social media and SMS.
<b>Harm:</b>	<p>As stated in the <i>Child Protection Act 1999</i>:</p> <ul style="list-style-type: none"> <li>▪ “Harm” to a child, is any detrimental effect of a significant nature on the child’s physical, psychological and emotional wellbeing.</li> <li>▪ It is immaterial how the harm is caused.</li> <li>▪ Harm can be caused by <ul style="list-style-type: none"> <li>– Physical, psychological or emotional abuse or neglect, or</li> <li>– Sexual abuse or exploitation</li> </ul> </li> </ul>
<b>Neglect:</b>	Neglect is a failure to provide the necessary care, aid or guidance to dependent adults or children by those responsible for their care. Types of neglect include but are not limited to any of the following four actions or behaviours.
<b>Passive Neglect:</b>	Withholding or failure to provide the necessities of life.
<b>Physical Abuse:</b>	the infliction of physical pain, discomfort, injury or physical coercion such as hitting, shoving, pushing, burning and physical restraint.
<b>Physical Neglect:</b>	Failure to provide adequate food, shelter, clothing, protection, supervision and medical or dental care that places people at undue risk through unsafe environments or practices.
<b>Psychological/Emotional Abuse:</b>	The infliction of psychological or emotional suffering or fear, including actions that lead to fear of violence, to isolation or deprivation, feelings of shame, loss of dignity, humiliation, intimidation or powerlessness.
<b>Sexual Abuse:</b>	The infliction of sexual assault, sexual harassment including all forms of illegal sexual activity such as molestation, rape and carnal knowledge.
<b>Wilful Deprivation:</b>	Wilfully denying a person assistance and thereby exposing that person to the risk of physical, mental or emotional harm.



## 1.5 Responsibilities

ALARA QLD Limited's *Board of Director's* has the responsibility for ensuring that the values and ethics of the organisation accurately reflect its commitment to maintaining the safety and wellbeing of all children and young people. The Board has the ultimate responsibility to ensure that appropriate policies and procedures and Code of Conduct are in place.

The *Chief Executive Officer* is responsible for overseeing the implementation of strategies to maintain a child friendly and safe environment, responding to allegations of harm and ensuring that all reasonable steps are taken by ALARA, its management, staff and volunteers to prevent abuse of children and young people. The Chief Executive Officer is also responsible to ensure that all staff, contractors and volunteers are aware of relevant laws, organisational policies and procedures, the Code of Conduct and Code of Conduct for Working with Children and Young People.

The *Chief Financial Officer, Chief Service Officer and Coordinators/Facilitators* are responsible for ensuring that adequate screening of prospective employees and volunteers is carried out as per the recruitment procedures and that the relevant renewables are maintained.

*Management* and the Coordination/Facilitation Team are responsible to ensure services are planned, implemented, monitored and reviewed to maintain a culture that promotes child safety and development.

Where ALARA subcontract or broker ALARA-managed services for children to another organisation (including sole providers) the relevant Coordinator/Facilitator must ensure that the organisation has in place complimentary child protection policies and processes.

*Each employee and volunteer* is responsible for reporting to the Coordinator/Facilitator and/or the Chief Service Officer of any actual or suspected instances of harm and of any evidence that suggests that abuse, assault or neglect may be occurring or is at risk of occurring. *The employee is not responsible for investigating the incident.*

*Management* is responsible for ensuring that appropriate action is taken following reports related to abuse, assault or neglect as defined by the Preventing Abuse, Neglect and Exploitation Policy and associated procedures. Management is responsible for mandatory reporting. Suspected or alleged incidents of abuse, neglect and exploitation of clients are reported in line with the requirements of the relevant funding body, e.g. Disability Services Service Provider's Incident Reporting Policy. Observed or reported observed abuse, neglect or exploitation of children by family is to be reported to the Department of Child Safety.

*All staff and volunteers* are responsible for ensuring all interactions with children and young people maintain the safety and wellbeing of these individuals. Staff and volunteers have a responsibility to familiarise themselves with the relevant laws, the Code of Conduct, the



Code of Conduct for Working with Children and Young People, the organisation's policy and procedures in relation to child protection and comply with all requirements.

*Each employee and volunteer* is responsible for acting responsibly and for protecting themselves and others from abuse and assault and from the likelihood of accusations of abuse, assault or exploitation.

*All staff and volunteers* are responsible for providing an environment that is supportive of all children's emotional and physical safety.

## 1.6 Effective Date

<b>Issued:</b>	January 2007
<b>Reviewed:</b>	August 2013
	July 2015
	May 2016
<b>Reviewed and renamed:</b>	January 2017 (previously Policy – Risk Management - Children and Young People)
<b>Reviewed:</b>	December 2019
<b>Reviewed:</b>	July 2021
<b>Reviewed:</b>	Dec 2021
<b>Reviewed:</b>	March 2023

## 1.7 Content

ALARA QLD Limited is committed to the safety and wellbeing of all children and young people who have contact with ALARA services and operations as outlined in its values and operating policies and procedures.

### 1.7.1 Promoting a Child Safety Culture

- At all times staff and volunteers have a duty of care to provide environments that are friendly, promote learning and enjoyment and are safe for children and young people. This includes always treating individuals with respect and understanding and upholding their right to feel safe, be listened to and involved in decisions.
- A range of strategies are to be implemented to promote and maintain a child safety culture.
- At all times staff and volunteers are to consider what is in the best interest of the child or young person when making decisions that affect or impact on young people.
- Staff are to work closely with parents and carers to ensure the needs of the child are met effectively. This includes providing parents with information about:

- ALARA’s commitment to Child Safety
- Advocacy
- How to make Complaints and give Compliments
- Abuse and Neglect and Exploitation
- Rights and Responsibilities of clients.

### 1.7.2 Recruitment, Screening, Selection and Feedback

ALARA’s processes for recruitment and selection are outlined in *Policy and Procedures– Staff Recruitment and Selection* and *Policy and Procedures – Managing Volunteers*. These documents outline the best practice approach employed by ALARA in the recruitment, screening and selection of ALARA staff and volunteers to ensure that they will provide quality service and will not harm, abuse or exploit vulnerable people (including children and young people) involved in our programs, community initiatives, services are when attending facilities or events.

Processes related to staff and volunteer screening are outlined in *Procedure – Working with Children Check - Blue Card*, *Procedure – Yellow Card Applications* and *Procedure – National Police Checks*.

- Only suitably qualified and skilled staff and volunteers are to be engaged through following the relevant organisational recruitment procedures.
- All staff and volunteers working with children or young people or with access to their information are to successfully complete a criminal history check NDIS Worker Clearance Check or have a current Disability Services Positive Notice (or Exemption Card) and obtain a Blue Card from the Blue Card Services prior to commencing employment with children or young people. NO CARD -NO START.
- Staff or volunteers in administration roles, management or governance roles are also to successfully required to obtain an NDIS Worker Clearance or have a current Disability Services Positive Notice (or Exemption Card) and Blue Card. NO CARD -NO START.
- Employment and volunteering opportunities for children and young people may be provided when the relevant procedures are followed, and adequate supervision and support can be provided.
- All staff and volunteer’s performance is to be assessed/appraised/monitored and complaints and incidents thoroughly investigated to ensure the safety of children and young people is maintained at all times.

### 1.7.3 Staff and Volunteer Training

ALARA is committed to providing effective training for staff and volunteers to ensure it can deliver a child safe environment at all times. The process for induction staff and volunteers is outlined in *Policy and Procedure – Staff Training and Development* and *Policy and Procedure – Managing Volunteers*. All staff and volunteers are required to be aware of and familiar with the requirements of this policy and agree to the *Code of Conduct – Working with Children and Young People*.

- During their orientation all staff and volunteers are to receive training and information about how to promote and maintain the safety and wellbeing of children and young people. This is to include details about their responsibilities, procedures to follow and the signing of the *Code of Conduct for Working with Children and Young People*.
- To ensure a child safety culture is maintained, relevant ongoing information and training is to be provided to all staff and volunteers.

### 1.7.4 Managing Risk for Supports and Activities

ALARA's procedures and processes for eliminating and managing risk around services for children and young people is outlined in *Procedure - Risk Management – Safeguarding Children and Young People* which should be read in conjunction with this document. Key procedural elements include:

- Risk assessments are to be undertaken prior to any activities/services being commenced and when situations/needs change. Adequate responses, as outlined in the relevant procedures, are to be planned and implemented to minimise the likelihood of risks occurring
- Client Service Staff are to know who has parental responsibility for any children they work with and have contact details readily available for use.
- Management is responsible for ensuring computers, the internet, e-mail and mobile phones are used responsibly to maintain the safety and wellbeing of children and young people.
- At all times staff are to provide adequate support and supervision for children. This includes activities where the internet and mobile phones are used by children and young people.
- Children, young people, parents and carers are to be provided with adequate information to give informed consent, permission and approvals for involvement in activities, services and/or for their photographs to be taken and/or used.

### 1.7.5 Contracted Support

- If a funding source allows brokerage and subcontracting arrangements as part of those purchasing arrangements ALARA will ensure that the agency/contractor has in place Policies and Procedures (including staff and volunteer screening) that reflect this policy and related policies and procedures. Refer to *Policy – Brokerage* and *Flow Chart – Brokerage* as well as *Forms – Brokerage* and *Subcontracting*

### 1.7.6 Promotions

Promotions and advertising undertaken by ALARA are to always present a positive image of children and young people and where pictures are used appropriate consent is to be gained from the parent/s and child.

### 1.7.7 Managing Child Abuse Reports or Allegations

ALARA staff and volunteers have an important role to play in protecting children who are at risk of harm due to abuse, exploitation or neglect. A report of child exploitation or abuse may include a disclosure, concern or allegation made by a child or another person and includes suspected breaches of the Code of Conduct – Working with Children and Young People. The actions staff or volunteers are required to take in around reporting and record keeping in these instances are outlined in *Procedure – Risk Management – Children and Young People* and *Procedure - Preventing and Responding to Abuse, Neglect and Exploitation*. Staff and Volunteers must also be familiar with their obligations in accordance with ALARA's *Statement - Duty of Care* and the Queensland Criminal Code.

ALARA requires that all incidents suspected, or alleged abuse are reported to the relevant authorities. This reporting relates to expected abuse occurring in the context of ALARA services but also in the child and young person's home or family environment or in other places or organisations outside the home. In the case of an allegation or suspected abuse involving ALARA staff or volunteers there is also mandatory reporting to the funding body.

- Staff and volunteers are to promptly report to management all alleged or suspected instances of abuse, assault or neglect. (NB: Because of their obligations under the Queensland Criminal Code observations or suspicions of sexual offending towards a child should also be reported directly to the police)
- Management is responsible for ensuring reports are responded to promptly and action taken as described in the associated procedures. This includes notification of appropriate authorities and fulfilling mandatory reporting obligations.
- In situations of suspected or actual harm the individual's right to privacy and protection are to be recognised and upheld where practicable and within legislative limits.

- Any concerned person, including a child or young person, parent, relative, another client, friend or person from the community is able to make a report or an allegation without fear of retaliation or retribution. The concerned person will be supported and assisted to make this report (e.g. through using an advocate).
- If a person making a report or allegation is dissatisfied with the response from ALARA or do not feel they are able to refer the matter to ALARA directly, they may refer the matter to a range of other organisations. These include but are not limited to the Police, Child Safety, the Commission for Children and Young People, the Public Advocate, the National Disability Service Abuse and Neglect Hotline, Disability Services and Community Care.
- When responding to a report, allegation or suspicion of harm, the safety of the child or young person subjected to abuse, assault or neglect will be paramount. This can include seeking medical assistance where appropriate and taking all reasonable steps to avoid contact between the person and the alleged offender.
- Confidential records shall be maintained of all reports of suspicions of harm and/or reports of evidence of abuse and/or anecdotal reports of possible indicators including outcomes of any investigation. The employee shall ensure that this information is recorded accurately and reported to management.
- The organisation will provide support or counselling to victims and those who are accused of abuse, assault and neglect within the limits of its resources, natural justice and at the discretion of management.
- If an employee suspects that abuse is occurring within the client's family or support unit, but not directly involving the organisation's client(s) or employees, the matter shall be referred to management. A strategy which meets the Organisation's wider Duty of Care shall be determined and initiated including reporting of the matter to appropriate external authorities.
- Following the actioning of any complaint or disclosure on suspicion of harm, ALARA will conduct a review of our Child Safety Strategy and related policies and procedures

#### 1.7.8 Record Keeping

- Records are to be maintained of relevant client details, complaints, incidents, investigations, risk assessments and staff recruitment, training attendance, criminal history checks, blue cards and appraisals/assessments.

### 1.7.9 Communication and Support Strategies

- ALARA is committed to communicating its strategy to safeguarding children and young people to all stakeholders. This will occur through Induction and Orientation and training and periodic newsletter articles. A copy of ALARA's *Statement of Commitment to Child Safety* will be posted on the ALARA website, included in the Support Worker Handbook, Client Information Handbooks as well as being available in Fact Sheet format.

## 1.8 Related Documents

### 1.8.1 Policies

- Policy – Fraud
- Policy – Workplace Health and Safety
- Policy – Preventing Abuse, Neglect and Exploitation
- Policy – Risk Management
- Policy – Incidents
- Policy – Privacy
- Policy – Complaints Management and Resolution
- Policy – Staff Recruitment and Selection
- Policy – Staff Training and Development
- Policy – Managing Volunteers

### 1.8.2 Procedures

- Procedure – Fraud Investigation
- Procedure – Discipline and Performance Management
- Procedure – Risk Management – Personnel and Information
- Procedure – Risk Management – Workplace Health and Safety
- Procedure – Risk Management – Safeguarding Children and Young People
- Procedure – Quality Assurance
- Procedure – Incidents
- Procedure – Preventing and Responding to Abuse, Neglect and Exploitation
- Procedure – Privacy
- Procedure – Complaints (Stage 1)

- Procedure – Complaints (Stage 2 – 4)
- Procedure – Staff Recruitment and Selection
- Procedure – Staff Training and Development
- Procedure – Managing Volunteers
- Procedure – Mentoring of New Support Workers
- Procedure – Working with Children Check – Blue Card
- Procedure – Yellow Card

### 1.8.3 Statements

- Statement – Code of Conduct
- Statement – Code of Conduct Children and Young People
- Statement – Commitment to Child Safety
- Statement – Workplace, Health and Safety
- Form – Activity Planning and Risk Assessment
- Form – Client Risk Assessment
- Form – Client Risk Assessment Part 2
- Form – Hazard
- Form – Incident
- Form – Incident Investigation

### 1.8.4 Legislation

- United Nations Convention on the Rights of the Child
- Human Rights and Equal Opportunity Commission Act 1986 (Commonwealth)
- Human Rights Act 2019 (Queensland) from 1 January 2020
- Disability Discrimination Act 1992 (Commonwealth)
- Child Protection Act 1999 (Queensland)
- Commission for Children and Young People and Child Guardian Act 2000
- Child Employment Act 2006 (Queensland)
- Child Employment Regulations 2006 (Queensland)
- Children and Young Workers Code of Practice 2006 (Queensland)
- Disability Services Act 2006 (Queensland)
- Anti-Discrimination Act 1991 (Queensland)



- Working with Children (Risk Management Screening) Act 2000 (Queensland)
- Working with Children (Risk Management and Screening) Regulation 2020 (Queensland)

### 1.8.5 General

- Client Information Manuals
- Support Worker Handbook

## 1.9 Quality Standards

### 1.9.1 Human Services Quality Standards

- Standard 1 – Governance and Management
- Standard 3 – Responding to Individual Need
- Standard 4 – Safety, Well-Being and Rights
- Standard 5 – Feedback Complaints and Appeals
- Standard 6 – Human Resources

### 1.9.2 NDIS Practice Standards

Core Module:

- Standard 1 - Rights and Responsibilities
- Standard 4 – Feedback and Complaints
- Standard 6 – Governance and Operational Management
- Human Resource Management
- Incident Management

## 1.10 Reference Materials

- Child and Young People Risk Management Strategy Tool – Blue Card Services, Queensland Government
- Queensland Family and Child Commission Website
- YMCA Safeguarding Children and Young People
- National Principles for Child Safe Organisations 2018 (Initiative of the Council of Australian Governments)



07/03/2023

**Chief Executive Officer**  
**ALARA QLD Limited**

**Date**

## 2. Procedure Risk Management – Safeguarding Children and Young People

The following procedure forms part of ALARA QLD Limited's Risk Management Strategy.



## 2.1 Statement of Commitment to Child Safety

ALARA QLD Limited is committed to child safety. As an organisation we aim to promote and protect at all times the best interest of children involved in our programs. ALARA staff and volunteers have a duty of care to provide environments that are friendly, promote learning and enjoyment and are safe for children and young people.

All children regardless of gender, race, religious beliefs, age, disability, sexual orientation, family or social background have equal rights to protection from abuse. ALARA has zero tolerance of child abuse. Everyone working or volunteering at ALARA is responsible for the care and protection of children within our care and reporting information about child abuse. All allegations and safety concerns will be treated seriously and consistently with our policies and procedures.

ALARA is committed to identifying risks early and removing and reducing those risks. The organisation has robust human resources and recruitment practices and is committed to training and educating our staff on child abuse risks. We have specific policies and procedures in place that support our leadership team, staff and volunteers to achieve these commitments.

We make this statement to child safety as we believe that the services we provide for children with a disability and their family should support and sustain family caring arrangements as well as provide an enriching experience for the children, families and communities involved. Providing safe circumstances for these services is fundamental to our organisation.

## 2.2 Definitions

*Refer Policy – Risk Management – Safeguarding Children and Young People*

## 2.3 Purpose

ALARA QLD Limited (ALARA) is committed to child safety. The aim of this procedure is to ensure that strategies are in place to both prevent abuse or harm of children and young people in receipt of support from ALARA as well as to outline the manner in which reports of alleged abuse, neglect and exploitation should be responded to by the organisation.

## 2.4 Responsibilities

*Refer Policy – Risk Management – Safeguarding Children and Young People*

## 2.5 Organisational Strategies for Preventing Child Abuse

### 2.5.1 Human Resource Strategies

#### Staff and Volunteer Recruitment and Selection

ALARA acknowledges that recruiting, selecting and screening the right people for positions is vital for maintaining a safe environment and protecting children and young people. For specific details regarding staff and volunteer recruitment and selection the relevant policies and procedures “Managing Volunteers” and “Staff Recruitment and Selection” are to be referred to. Management is responsible for ensuring the processes outlined in these documents are implemented and applied consistently.

The following procedures are of specific importance to maintaining a safe environment for children and young people:

- All staff and volunteers need to demonstrate through their application, interview and reference checks that they meet the positions key selection criteria and that their attitudes and work practices are in keeping with the values of ALARA and uphold client’s right.
- All staff and volunteers need to obtain an NDIS Worker Clearance or hold a Disability Services Positive Notice Card (or Exemption Card) and have a current Blue Card where they work with clients under the age of 18 years. This will be in accordance with the current requirement of the NDIS Quality and Safeguards Commission, Commission for Children and Young People and the Child Guardian (See Procedure — Staff Recruitment and Selection, procedure — Blue Card, Procedure — Yellow Card). Depending on the nature of specific funding arrangements under which clients are supported some staff be required to obtain and submit a National Police Check on a three-yearly basis.
- Board Directors, Senior staff, the Direct Services Team and Administration staff are required to obtain and submit a National Police Check (name only) on a three yearly basis. This may also be required for other staff on a case by case basis if required as part of a specific funding of contractual agreement. Board and Senior staff must also hold a Blue Card (Working with Children Check) and Disability Services Positive Notice Card (or Exemption Card).
- Staff and volunteers need to obtain a Blue Card from the Commission for Children and Young People prior to commencing work unsupervised with clients.
- In relation to decision making roles and working and volunteering roles with children and young people, the **NO CARD-NO START** rule applies.

## Induction and Orientation

As part of the Induction process in which all new staff participate, they will be provided with the following documentation related to Prevention and Responding to Abuse, Neglect and Exploitation and Child Safety

- Code of Conduct
- Code of Conduct for Working with Children and Young People
- NDIS Code of Conduct
- Confidentiality Policy and Procedure
- Privacy Policy, Procedure and Statement
- Fraud Policy, Statement and Agreement
- Workplace Harassment, Policy and Procedure

All new employees are required to read and sign to verify these documents before commencing in their new work role.

In addition, the formal Orientation program for all new service staff will include the following topics, relevant to preventing and responding to abuse, neglect and exploitation:

- Client Rights and Responsibilities
- Staff and Volunteer Rights and Responsibilities
- Duty of Care
- Preventing, Detecting, and Reporting Abuse, Neglect and Exploitation
- Procedures for Working with Children and Young People
- Advocacy
- Procedures for Incidents
- Cultural Sensitivity
- Client Complaints Management and Resolution process
- Grievance Process (Staff and Volunteers)
- Client and Worker Boundaries
- Understanding and responding to Behaviours of Concern

## Training

This training will also be reinforced through further small group training sessions or on-line training scheduled as part of the annual training plan.

## Information for Staff and Volunteers

All staff and volunteers employed or engaged by ALARA are expected to be familiar with and follow the general *Code of Conduct* and the specific *Code of Conduct for Working with Children and Young People*. When staff and volunteers commence at ALARA they are expected to read and sign these documents to verify their commitment to upholding these codes. Training is received in detail during the Orientation Program to ensure they fully understand what is expected of them and their associated responsibilities.

Information regarding child safety and the prevention and response to abuse, assault and neglect will be provided in the Support Worker and Volunteer Information Manual and through periodic articles in the Staff Newsletter.

## Staff Performance

Management will ensure the following processes will occur for all staff and volunteers. This will ensure professional standards are maintained, opportunities provided to reflect on individuals own work practices and that of others and to raise any concerns relating to suspected situations of abuse, assault or neglect:

- Probationary reviews/assessments will occur within 3 months of commencing service
- Formal and informal supervision and support will be provided regularly
- Double-up / buddying shifts will occur for support workers as required when commencing with a new client
- Annual performance reviews will occur
- Investigations of staff performance will be undertaken in situations where a complaint has been made about a worker's performance. Where it is deemed appropriate, counselling, further training or support, disciplinary action, suspension and/or dismissal will occur.

*(See Procedure - Staff Development and Training and Policy – Discipline and Performance Management for further details)*

### 2.5.2 Reporting

All staff and volunteers have a duty of care to report suspected or actual abuse or neglect to their Supervisor, Coordinator/Facilitator or Manager. The procedure to follow includes:

- **All disclosures are to be acted upon.**
- Initially staff are to make an immediate verbal report to the relevant Coordinator/Facilitator or Manager as soon as is possible. If after hours reports are to be made to On—Call who is then responsible for notifying the Chief Service Officer (CSO) and the Chief Executive Officer (CEO) as soon as possible.



- The person making the initial report is to complete an Incident form and forward this to the relevant Coordinator/Facilitator or Manager at the soonest possible opportunity but within 24 hours. Details are to include the nature and extent of any incident, a description of how the incident occurred and the names and contact details of all those involved.
- If the person making the report/allegation is not a member of staff, they are to be actively encouraged to complete and submit a “Complaint Form – Stage 2”. The report should be taken verbally and documented on a Stage 2 form assistance is required.
- Upon receiving a report, the relevant Coordinator/Facilitator is to advise Management immediately.
- If a staff person or volunteer witnesses a crime and the child or young person is at immediate and continuing risk, you should contact the police immediately for assistance and then ALARA at the first available opportunity. Render assistance to the person if you can do so without putting yourself at risk. Ensure that the scene is not disturbed, take notes, record names or witnesses and if possible, use your phone to take photos that do not impact on the victim’s dignity. This will be useful for future witness statements and incident reporting. (See current contact numbers for reporting – Attachment 1)
- The CEO or CSO will report all critical/notifiable/reportable incidents to the relevant funding body in the required timeframes in accordance with the relevant *Critical incident Reporting* requirements.

### 2.5.3 Investigating

- Where it is alleged that the person who has committed the abuse is an employee or volunteer of ALARA that any action necessary will be taken to ensure that the alleged perpetrator has no contact with the complainant while the investigation occurs.
- If it is alleged that a member of staff, contractor or a volunteer may have committed an offence or breached the organisation’s policies or Code of Conduct then the person may be stood down (with pay, where applicable) while an investigation occurs. If the allegation relates to sexual abuse then the staff member, contractor or volunteer will be automatically suspended from work or other duties with ALARA while the investigation is being conducted (internally and by QPS and where applicable, Child Safety. (Refer *Procedure – Discipline and Performance Management*)
- If the Child Safety or the police are conducting an investigation of a report, all employees, contractors or volunteers must co-operate fully with the investigation

- Whether or not the authorities decide to conduct an investigation, the CEO/CSO will conduct an investigation. This investigation must not conflict with or compromise any proceedings of the authorities. All employees, contractors and volunteers must co-operate fully with the investigation.
- An investigation by ALARA will be conducted according to the rules of natural justice.
- Every effort will be made to keep the investigation confidential; however other members of staff, witnesses and family may need to be consulted in conjunction with the investigation.

#### 2.5.4 Record keeping

Management is responsible for ensuring the following records are maintained that relate to risk management for children and young people:

- Records of staff and volunteer attendance for the orientation and all training which relate to the provision of service for children and young people.
- A record showing that staff and volunteers have current compliance with the Blue Card System and any other requirements for their position
- For relevant Client Service Staff, a record showing individuals have a current First Aid and CPR certificate
- Incident reports, Complaints (Stage 2) and reports of any resulting investigations. Incidents and Complaints (Stage 2) are to be recorded on the appropriate register and summaries presented to the Workplace Health and Safety Committee (where related to WPHS) and the Board of Directors.
- The Payroll Officer maintains the TRACCs data and monitors the renewal dates and reminders relating to Positive Notice Blue Cards for Child related employment
- All information will be kept in accordance with ALARA's Policies and Procedures in relation to Confidentiality and Privacy.

#### 2.5.5 Working with Children and Young People

ALARA is committed to upholding the United Nations Convention on the Rights of the Child. In accordance with this convention ALARA requires that all staff and volunteers uphold the following rights for children and young people to:

- Feel safe
- Be listened to
- Be involved in decision making
- Have their cultural values respected

- Not be unjustly discriminated against in the basis of their status, activities, expressed opinions or the beliefs of their parents or carers
- Have their best interests considered

Staff and volunteers are also to ensure children and young people know what is expected of them and assist them to meet the expectations listed below:

- Show respect for other children, young people and adults
- Keep themselves safe
- Report inappropriate behaviour, unsafe situations or harm

### 2.5.6 Working with Parents and Carers

ALARA is committed to working in partnership with parents, carers and guardians to ensure the needs of their child are met effectively.

Coordinators and Facilitators are to ensure that:

- ALARA has a current record of who has parental responsibility for each child or young person they work with. This includes checking these details periodically or as family circumstances change (e.g. When parents separate)
- Recording in TRACCS and in the individual child or young person's paper file the name, address and contact details of the parent, carer, guardian and other identified emergency contacts. This is to include the quickest way to contact these people in an emergency e.g. via their mobile phone. These details are also to be checked periodically, at reviews and as circumstances change.
- Clients (including young people) and families/guardian are aware of their rights and responsibilities in relation to the service, how to make a complaint and how to access an advocate. This will be done by providing information in the Client Information Manual and verbally explaining these rights and processes when a client commences a service with ALARA at subsequent service reviews or as required.
- Relevant staff and volunteers are aware of essential information relating to the children and young people they are working with e.g. emergency contact details, support plans, consent details.
- Regular contact is maintained with families/carers and support workers in order to monitor situations and stresses for individuals and implement timely responses to minimise the likelihood of abuse or other forms of harm. Making referrals to other agencies which can assist in the prevention of abuse assault or neglect. Examples of this include referring individuals to the Behaviour Support Team for assessment and the development of appropriate interventions and referrals for counselling, respite and funding packages.

- The CEO/CSO will ensure articles are provided in the Client Newsletter ensure that families and guardians are aware of ALARA's child safety strategy, how to make complaints, how to access an advocate and what to do in situations where abuse or inappropriate behaviour concerning children or young people is observed or suspected.
- Fact sheets on ALARA's Commitment to Child Safety and about Preventing and Responding to Abuse, Assault and Neglect will be made available for clients, carers, guardians and advocates.

### 2.5.7 Permissions and Approvals

Coordinators/Facilitators are responsible for ensuring adequate permissions and approvals have been gained for children and young people form in the following circumstances:

- Share information
- Participate in activities, outings and camps
- Provide assistance with medication
- Take photographs
- Use photographs for publications like the Client Newsletter/Website/Social Media. Regardless of the permission given publication of images will be checked with the family on each occasion and the approval noted in TRACCS

Current forms that are to be used include:

- Form - Client Consent General
- Form - Medication – Authority to Administer

Where an appropriate form does not already exist for gaining permission or approval, then the Chief Service Officer is responsible for ensuring a suitable form is developed and implemented prior to the activity being undertaken.

Staff are to ensure when permission or approval is being gained that the carer or parent and child or young person have been provided with enough information to make informed decisions. They also need to be aware of their right to change their approval or permission at a future date if they wish to.

### 2.5.8 Activities and Event Planning

Coordinators, Facilitators and Support Workers are involved in planning and facilitating activities with and for children and young people are to ensure:

- That the activities maximise opportunities to have fun, learn and that are educational, support the interest and wellbeing of children and young people and are age appropriate
- Parents are consulted about the activities they wish their child to participate in and parents wishes are respected.
- Children or young people are not left unattended. Staff need to know where individuals are at all times and what they are doing.
- Dangerous behaviour by children and young people is not allowed
- When planning activities that the actual and potential risks have been assessed, a plan to minimise risks is developed and then implemented. The assessment form Activity Planning and Risk Assessment is to be used and relevant others (e.g. staff on the group activity) are to be informed of what is expected. The assessment includes considering the environment where the activity is to take place (e.g. parking, shade or facilities), the individual needs of clients, and the number of clients and staff ratios needed and the recording of emergency contacts relevant to the venue.
- Adequate water, sunscreen and first aid equipment is available
- Equipment to be used (e.g. sports equipment) is in good working order, safe for children and young people to use and appropriate for the age range and capabilities of individuals. If there is not enough equipment for the number involved in the activity then a system needs to be in place to ensure everyone gets a chance to use the equipment.

Prior to activities, outings and camps staff are to ensure children, young people, parents and staff are provided with any necessary information. This can include but is not limited to:

- Providing information on what is expected of the activity
- Providing and gaining emergency contacts
- Explaining what will happen if something goes wrong
- Allowing people the opportunity to ask questions and raise any concerns
- Clear advice about what the child or young person should bring to the activity e.g. hat, water bottle, lunch
- Confirming dropping off and picking up details. This is to include establishing a procedure if a parent is delayed or fails to arrive or the group is delayed.

Following activities, outings and camps the responsible Coordinator/Facilitator is to ensure a review of the activity is undertaken, identifying successes and any areas that require improvement the next time a similar activity is undertaken. In the event of any incidents or complaints this information needs to be considered as part of the activity review.

The relevant Coordinator/Facilitator is responsible for ensuring only suitably qualified and trained staff are rostered for activities, groups and camps and that the ratio for support is adequate to ensure the safety and effective supervision for those participating. When volunteers are engaged there also needs to be adequate supervision and support available for the volunteers by paid staff.

When organising events for ALARA (e.g. the Client and Staff Christmas Party) Management is responsible for ensuring a risk assessment is undertaken as part of the planning process and that strategies are developed and implemented to minimise risks and maximise opportunities for children and young people to have fun safely.

#### 2.5.9 Purchased Services (Brokerage or Subcontracting)

ALARA contracts a range of services for the benefit of the organisation (e.g. tradespeople, IT consultants) and clients and carers (e.g. brokered or subcontracted services to meet specific needs of clients). The Coordinator/Facilitator or Administration team member is responsible for ensuring contracted services and organisations are aware:

- Of ALARA's commitment to maintaining a child and youth friendly environment that does not expose risks to individuals
- That any action taken by the contracted agency and staff that is detrimental to such an environment may result in termination of the contract.
- That any contracted staff working directly with children or young people are required to have a current Blue Card and a criminal history screen.
- That contractors not working directly with children and young people e.g. electrician, will be supervised properly while working in an ALARA site where children or young people are.

*Refer to Flowchart - Brokerage for the process of Brokering/Sub-contracting Services*

#### 2.4.10 Promotional Material

ALARA promotes and advertises services and activities through a variety of means which include flyers, the website, Facebook and newsletters. When undertaking promotions or advertising management is responsible for ensuring:

- ALARA's commitment to providing a friendly and safe environment for children and young people is highlighted when this is appropriate.
- That if any photographs of children and young people are used that appropriate and informed consent has been gained from the person's parent or carer and that permission has been gained from the child or young person. Information on the use of the image needs to be explained in an age appropriate way so the child or young person can understand. While a parent may sign a general consent form, use of an image must be checked on each occasion with the parent or guardian and consent noted in TRACCS notes
- That the identity of anyone under 18 years remains confidential other than in circumstances where the parent or guardian wishes the child's identity to be known e.g. for an award or achievement. ALARA will ensure that no images are published.
- Where a child or young person should not be identified that the image will not allow their identification.
- Any images portray the child or young person positively and that the use of the image does not exploit the individual in any way or put them at risk.
- In all situations where the inclusion of an image of a child or young person is being decided that the best interests of that individual have been fully considered in the decision-making process.

#### 2.5.11 Computers, E-mail, Internet and Mobile Phone Use

Computers, e-mail, the internet and mobile phones are used by staff and volunteers as part of their work and are important educational and leisure tools for children and young people to use. They do however pose potential risks which need to be managed and minimised.

Risks can include exposure to:

- Potential abusers
- Hateful and violent content
- Computer viruses and hackers
- The exchange of abusive or insulting messages
- Websites providing information on harmful or illegal activities



Therefore, each staff person and volunteer is to ensure that:

- When allocated a computer/laptop or tablet they
  - have appropriate approved screen savers
  - only access appropriate internet sites
  - do not receive or send inappropriate e-mails
- Client computer use on client dedicated computers/tablets is monitored

Management will ensure that:

- The links to other organisations websites that are available through the ALARA website are appropriate for children and young people
- Filtering or blocking software is installed on computers that clients have access to as part of the strategy to minimise children and young people having access to inappropriate websites.

Where children and young people have access to computers Coordinators/Facilitator and staff are to ensure:

- Appropriate screen savers are in use
- That internet ready computers are not positioned in isolated areas and that children and young people are supervised when accessing the internet
- Children and young people are educated about appropriate use of computers, the internet and e-mail and potential dangers. This includes telling them
  - never to arrange to meet someone they have met on-line without permission
  - that some people tell lies when they are on-line
  - not to give out personal details like addresses and phone numbers when they are on-line
- The use of educational games and puzzles is considered as a way of showing children and young people how to use the computer and internet safely and in a fun way
- Appropriate games and internet sites only are used
- They are able to audit the computer use history to monitor the appropriate use of the computer

If using ALARA mobile phones or cameras to photograph programs or record incidents, the images are to be deleted immediately after they have been forwarded or downloaded for their intended use by ALARA. Staff are not to take photographs of clients including children and young people on ALARA or private devices for their own use.

## 2.6 Related Documents

### 2.6.1 Policies

- Policy – Workplace Health and Safety
- Policy – Confidentiality
- Policy – Group and Excursion Activities
- Policy – Preventing Abuse, Neglect and Exploitation
- Policy – Risk Management
- Policy – Risk Management – Safeguarding Children and Young People
- Policy – Incidents
- Policy – Privacy
- Policy – Complaints Management and Resolution
- Policy – Staff Recruitment and Selection
- Policy – Staff Training and Development
- Policy – Managing Volunteers

### 2.6.2 Procedures

- Procedure – Discipline and Performance Management
- Procedure – Risk Management – Personnel and Information
- Procedure – Risk Management – Workplace Health and Safety
- Procedure – Quality Assurance
- Procedure – Incidents
- Procedure – Infection Control
- Procedure - Medication
- Procedure – Preventing and Responding to Abuse, Neglect and Exploitation
- Procedure – Privacy (Clients)
- Procedure – Concerns (Complaints Stage 1)
- Procedure – Complaints (Stage 2 – 4)
- Procedure – Staff Recruitment and Selection
- Procedure – Staff Training and Development
- Procedure – Managing Volunteers
- Procedure – Mentoring of New Support Workers

- Procedure – Working with Children Check – Blue Card
- Procedure – Yellow Card
- Procedure – National Policy Check

### 2.6.3 Flowcharts

- Flowchart – Brokerage

### 2.6.4 Statements

- Statement – Code of Conduct
- Statement – Code of Conduct Children and Young People
- Statement – Commitment to Child Safety
- Statement – Workplace, Health and Safety

### 2.6.5 Forms

- Form – Activity Planning and Risk Assessment
- Form – Client Risk Assessment
- Form – Client Risk Assessment Part 2
- Form – Critical Incident Report
- Form – Hazard
- Form – Incident
- Form – Incident Investigation



07/03/2023

**Chief Executive Officer**  
**ALARA QLD Limited**

**Date**

## Attachment 1: Reporting Child Abuse

All reports of allegations or suspicions of child abuse (physical or sexual) will be referred to the *Queensland Police Service*.

Queensland Police Service has a number of child protection and investigation units across Queensland. Contact *Policelink* on **131 444** and they will forward you to the correct number.

Observations of a crime or suspected criminal act in relation to a child or young person are also to be reported to the Police. Where the child or young person is in immediate danger or in a life-threatening situation, contact the Queensland Police Service immediately by dialling **000**.

- Where there is reason to believe that a child in Queensland is experiencing harm, or is at risk of experiencing harm in a family or community setting, contact Child Safety Services:
- **During normal business hours** - contact the Regional Intake Service on **1300 316 855**.
- **After hours and on weekends** - contact the Child Safety After Hours Service Centre on **1800 177 135** or (07) 3235 9999. The service operates 24 hours a day, seven days a week.

Concerns can also be reported to *Child Safety* by completing an *online report form* which can be located at <https://secure.communities.qld.gov.au/cbir/home/ChildSafety>

Where further assistance or advice is required contact the *Child Safety Services' Enquiries* Unit on **1800 811 810**. Child Safety Service Centres have professionally trained child protection staff who are skilled in dealing with information about harm or risk of harm to children.

ALARA will also follow the mandatory reporting requirements of the relevant funding body within the required timeframes.

## Statements – Code of Conduct, Code of Conduct for Working with Children and Young People, NDIS Code of Conduct and Commitment to Child Safety



**Statements** – Code of Conduct, Code of Conduct for Working with Children and Young People, NDIS Code of Conduct and Commitment to Child Safety

# CODE OF CONDUCT

## INTRODUCTION

This Code of Conduct (“Code”) outlines a set of guiding principles and standards of conduct expected at ALARA Qld Limited (ALARA). All employees, consultants, contractors, volunteers and other people representing ALARA are required to conduct themselves in a professional and ethical manner consistent with the guiding principles provided herein. :

## SCOPE

This Code applies to all workplace participants, which is defined as including employees, consultants, contractors, volunteers and other people representing ALARA, as such you must be familiar with and follow both the spirit and content of this Code

All workplace participants are responsible for its for its implementation and ensuring their conduct reflects the standards expressed within which builds a high performing and positive workplace culture. Managers and Supervisors have specific responsibility to support other people covered by this Code through ‘leading by example’.

## GUIDING PRINCIPLES

All employees, consultants, contractors, volunteers and other people representing ALARA are expected to demonstrate:

1. *Commitment to the objectives, mission, values, ethics, philosophy, policies and procedures of the organisation*
2. *Commitment to quality services and service user focus*
3. *Respectful and ethical behaviour*
4. *Teamwork and effective communication*
5. *Commitment to continuous improvement and Workplace Health & Safety*
6. *Compliance with legislation, standards and ALARA policies and procedures*
7. *Conformance to the procedures and principles in this code of conduct*

**1. Commitment to ALARA, demonstrated by:**

- Acting in the best interests of ALARA as a whole;
- Behaving in a way that upholds the objectives, mission, values, ethics and philosophy of ALARA;
- Behaving in a way that upholds the integrity and good reputation of ALARA; Demonstrating a ‘can do’ attitude;
- Working in a cost effective and efficient manner;
- Refraining from conducting or soliciting private business during work hours or using ALARA’s resources for private or private business purposes;
- Taking the necessary steps to ensure the protection and proper use of ALARA’s assets and resources, to prevent damage or theft;
- Only transacting and approving authorised expenditure;
- Acknowledging that ALARA is the owner of intellectual property created by employees and volunteers in the course of their employment;
- Refraining from making unauthorised statements representing ALARA or its position, publicly, in social media or to the media;
- Being punctual and only leaving the workplace early with prior approval;



- Promptly reporting and accounting for any absences;
- Dressing in a professional appropriate manner that is consistent with ALARA's Standard of Dress Policy;
- Reporting all incidents in accordance with the relevant policies and procedures including professional misconduct, unethical behaviour, abuse, neglect or exploitation, hazards, negligence or unsafe work practices; and
- Understanding and abiding by all ALARA safety rules and procedures and workplace health and safety legislation.

**2. Commitment to quality service and service user focus, demonstrated by:**

- Providing a service that promotes the service participants' rights, choice, independence and community inclusion;
- Ensuring service users are aware of their rights and responsibilities;
- Listening and communicating effectively with service users, carers and family members, colleagues, staff from other agencies and members of the public;
- Communicating with service users and carers in a manner that is accessible and appropriate;
- Encouraging service users, carers and service providers to be involved in the planning, management and implementation of service delivery;
- Advising of changes to, withdrawal or refusal of service;
- Ensuring reliability and responsiveness in the provision of support for service users and their families;
- Ensuring duty of care obligations are met;
- Applying the principles of the least restrictive alternative in all service user interactions;
- Being mindful of the fact that ALARA service users and all children are vulnerable to harm which includes physical, psychological, emotional, sexual abuse or neglect or other forms of exploitation, and taking all the steps necessary to manage risks which could lead to harm;
- Not engaging in and promptly reporting actual or suspected abuse, neglect or exploitation of any person, including overt or subtle coercion or the use of restrictive practices not specified in an authorised behaviour support plan;
- Demonstrating sensitivity to service users' and families expressed values, beliefs, gender identity, cultural, linguistic or religious diversity;
- Ensuring appropriate and accurate records are kept;
- Encouraging service users and carers to raise concerns in accordance with the Complaints Policy and Procedures;
- Being aware of professional limitations and asking for assistance when needed;
- Maintaining professional boundaries at all times e.g. including but not limited to taking service users to your private residence without ALARA authorisation, engaging in intimate relationships with service users or family members of people you directly support, purchasing items for service users with employees' own money, sharing of personal information or including clients or their significant others in your social, family life or activities;
- Consulting your supervisor and seeking advice if you are unsure of boundaries or the appropriate action to take in any work-related circumstance;
- Being honest, courteous and helpful.

**3. Respectful and ethical behaviour, demonstrated by:**

- Maintaining the privacy, dignity and confidentiality of employees, service users and volunteers;
- Acting with honesty, respect and integrity at all times;
- Taking responsibility and accountability for all duties and actions;
- Refraining from using your position for personal benefit or personal gain;
- Disclosing and, if required, resolving any real or perceived conflicts of interest;
- Not canvassing, soliciting or accepting private employment with individuals supported by ALARA or inducing or encouraging current or past clients to transfer service provision to yourself or another agency;
- Not defaming others or using language and behaviour that offends, bullies, harasses or unfairly discriminates against others;
- Not acting maliciously towards others;
- Avoiding engaging in gossip or speculation that breaches confidentiality or is damaging to interpersonal relationships, workplace motivation or morale;
- Not swearing or using any inappropriate language or communication methods;
- Having an understanding of differences (e.g. disability, age and cultural differences) and acting sensitively in accordance with these differences;
- Not engaging in unlawful discrimination on the basis of such attributes as race, impairment, gender, gender identity or sexuality, relationship status, pregnancy, parental status, breastfeeding, age, race, or religion;
- Supporting informed consent by providing accurate information related to service provision;
- Not taking advantage of service users, financially, emotionally or in any other way e.g. purchasing personal items whilst shopping for or with the service user or accepting gifts;
- Assisting individuals and families to use their funding allocation as effectively and efficiently as possible;
- Refraining from providing financial advice to clients or witnessing any legal documents (e.g. wills)
- Avoiding participation in “sharp practices” including over servicing, high pressure sales or inducements;
- Being responsible for your own property and ensuring that it is safe from damage or theft;
- Accurately representing qualifications and skills of oneself and others;
- Providing services in a manner consistent with professional codes (where applicable).

**4. Teamwork and effective communication, demonstrated by:**

- working collaboratively and in partnership, to serve the best interests of service users;
- listening and communicating effectively with service users, carers and family members, colleagues, staff from other agencies and members of the public;
- following the organisation’s grievance procedures to resolve conflicts with other employees or volunteers;
- utilising effective communication and consultation with others;
- encouraging a supportive and friendly environment;
- attending team meetings, expressing ideas and participating in discussion;
- actively learning from one another, sharing relevant information and seeking assistance when required;
- recognising and respecting diverse and complementary skills of others;
- remaining open to constructive comments with regards to behaviour or practice;
- if appropriate, providing guidance and feedback to others in a positive manner.

**5. Continual improvement and capability, demonstrated by:**

- Ensuring continual improvement and development of quality service provision;
- Acting with professionalism and responsibility at all times;
- Providing services within competency levels and observing professional boundaries;
- Exercising independent and sound judgment in performing duties;
- Not working when competency is negatively affected by alcohol or drugs (including prescription drugs);
- Refraining from smoking while on duty and in the case of support workers in preparation for providing support;
- Not performing duties when personal or health problems may interfere with performance;
- Ensuring fitness for duty;
- Encouraging and participating in professional development to maintain a high level of skill and competence;
- Encouraging service users, carers and service providers to evaluate service provision and provide feedback.

**6. Compliance to legislation and ALARA QLD LIMITED policies and procedures, demonstrated by:**

- Abiding by all relevant laws, standards, regulations , codes of practice, policies and procedures;
- Meeting workplace health and safety requirements;
- Providing services within the guidelines of the relevant legislations ,codes of practice, policies and procedures;
- Complying with all ALARA policies, procedures and protocols;
- To abide by driving regulations and road rules travelling to and from and in the course of work;
- Respecting privacy and confidentiality and not misusing information about ALARA, service users, employees or volunteers;
- Following lawful and reasonable instructions.

## BREACHES OF THE CODE

All persons covered by this code are responsible for their own actions. Employees can always, in confidence, seek advice from a manager, supervisor or peer if we are unsure whether their actions or decisions, or those of a fellow employee breaches this Code of Conduct.

Employees who breach the Code of Conduct may face disciplinary action, which may include dismissal. Contractors, consultants or volunteers who breach this Code of Conduct may face adverse action which may include termination of their contract for services with ALARA.

I understand it is my responsibility to be aware of the contents of the organisation's policies as they apply to my working conditions and to be familiar with any written procedures.

I understand that I have a responsibility to report any suspected breach of this Code of Conduct to my Supervisor.

I have read this document and agree to follow this Code of Conduct.

I will immediately report to my supervisor any suspected breaches of the ALARA QLD Limited's Code of Conduct.

Name: .....

Witnessed by: .....

Signature: .....

Signature: .....

Date: .....

Date: .....

## **STATEMENT**

### **CODE OF CONDUCT FOR WORKING WITH CHILDREN AND YOUNG PEOPLE**

ALARA's "Code of Conduct" outlines the general standards of work performance and ethical conduct required of all employees and volunteers. In addition, employees and volunteers are required to adhere to this specific "Code for Conduct for Working with Children and Young People".

#### **Statement of Commitment**

ALARA QLD Limited is committed to child safety. As an organisation we aim to promote and protect at all times the best interest of children involved in our programs. ALARA staff and volunteers have a duty of care to provide environments that are friendly, promote learning and enjoyment and are safe for children and young people.

All children regardless of gender, race, religious beliefs, age, disability, sexual orientation, family or social background have equal rights to protection from abuse. ALARA has zero tolerance of child abuse. Everyone working or volunteering at ALARA is responsible for the care and protection of children within our care and reporting information about child abuse. All allegations and safety concerns will be treated seriously and consistently with our policies and procedures.

ALARA is committed to identifying risks early and removing and reducing those risks. The organisation has robust human resources and recruitment practices and is committed to training and educating our staff on child abuse risks. We have specific policies and procedures in place that support our leadership team, staff and volunteers to achieve these commitments.

We make this statement to child safety as we believe that the services we provide for children with a disability and their family should support and sustain family caring arrangements as well as provide an enriching experience for the children, families and communities involved. Providing safe circumstances for these services is fundamental to our organisation.

All people involved in the care of children or management of information about children or services for children on behalf of ALARA QLD Limited will:

#### **1. Respect the law**

- Respect the rights of children as enshrined in the United Nations Convention on the Rights of the Child (1991)
- Respect and comply with all relevant requirements of legislation in relation to child safety and service provision

#### **2. Respect for ALARA's Values**

- Provide a service that promotes participation, independence and community inclusion of children with a disability

### **3. Respect for Children and their Families**

#### **(a) Respect the Rights, Dignity and Views of Others**

- Treat children with respect and understanding and value their ideas and opinions
- Respect the special relationship between children and their families and incorporate this perspective in interactions with children
- Develop positive relationships based on mutual trust and open communication with families
- Ensure that children or young people are not shamed, humiliated, oppressed, belittled or degraded
- Listen to and learn from families, in order to acknowledge and build upon their strengths and competencies, and support them in their role of nurturing their children
- Gain informed permission or approval from the parent and child/young person prior to undertaking any activity that requires consent (or check this has occurred)
- Involve children and young people in decision making in an age appropriate manner
- Provide boundaries and clear directions without using physical discipline
- Work to ensure children or their families are not discriminated against on the basis of gender, age, ability, economic status, family structure, lifestyle, ethnicity, religion, language, culture, or national origin

#### **(b) Safeguard Children from Abuse, Neglect and Exploitation**

- Create and maintain safe, healthy environments, spaces and places, which enhances a child's learning, development, engagement, initiative, self-worth, dignity and show respect for their contributions
- Ensure all interactions with children and young people maintain the safety and wellbeing of these individuals
- Listen to children and young people, taking everything they say seriously and following up concerns
- Ensure all physical contact with individuals is appropriate to the age and gender of the child or young person so the individual will feel comfortable and you will not be putting yourself at risk
- Follow the Support Plan in relation to the provision of personal care and behavioural support
- Avoid initiating unnecessary physical contact with a child or young person, or do things for a personal nature for them that they can do for themselves
- Not inflict any physical or emotional abuse such as striking, spanking, shaking, slapping, humiliating, ridiculing, threatening, or degrading children and/or youth
- Educate individuals about what is safe and unsafe conduct and their right to say no if they feel unsafe or uncomfortable in any way
- Report to your supervisor, coordinator or line manager as soon as is practicable any concern regarding the safety and wellbeing of a child or young person

#### **Privacy and Confidentiality**

- Respect the privacy of children their families/carers and only disclose information to people who have a need to know
- Not photograph or video a child or young person without the consent of the child and a current signed consent form by the parent/guardian being on file
- Not photograph or video a child or young person during the course of working or volunteering for ALARA for personal purposes (including personal social media)

#### **4. Diligence, Care and Attention**

- Provide adequate supervision of children and young people at all times. This includes not leaving individuals unattended and supervising the use of the internet and mobile phones
- Undertake risk assessments prior to activities or comply with the directions in the support plan arising from those assessments
- Ensure children and young people are not provided with access to tobacco, illicit drugs or alcohol products or exposed to inappropriate images or content
- Know who has parental responsibility for each child and young person you work with and have these individuals contact details available for use
- Work with children or young people while under the influence of alcohol or illegal drugs

#### **5. Provision of Appropriate Support**

- Communicate in ways that are appropriate and understandable for the child or young person
- Not use inappropriate language in the presence of children or engage in discussions of an adult nature in the presence of children
- Act as positive role models in their conduct with children and young people
- Provide age appropriate activities that maximise opportunities to have fun, learn and develop
- Not make contact, including phone calls, text messages, email, social media or on-line contact with children and young people outside the organisation's programs and activities
- Ensure that any communication with a child or young person by an authorised staff person is to be made through the parent/guardian or if directly by ALARA email or ALARA phone
- Avoid developing a 'special' relationship with a specific child or young person for their own needs
- Maintain appropriate professional boundaries in relation to interactions with the child or their family
- Not show favouritism or breach professional boundaries through the provision of gifts or inappropriate attention
- Adhere to all relevant organisational policies, procedures and practices

Date Reviewed: January 2022

# STATEMENT OF COMPLIANCE - CODE OF CONDUCT FOR WORKING WITH CHILDREN AND YOUNG PEOPLE

I have read, understood and agree to comply with the [Code of Conduct for Working with Children and Young People](#) and understand any breach of this code can lead to disciplinary action, including and up to termination of employment or cessation of engagement with the organisation.

I will immediately report to my supervisor any suspected breaches of the ALARA QLD Limited’s Code of Conduct for Working with Children and Young People.

Name:	Witnessed by:
Signature:	Signature:
Date:	Date:



## STATEMENT – NDIS CODE OF CONDUCT

The National Disability Insurance Scheme (NDIS) Code of Conduct (the Code) is set out in the National Disability Insurance Scheme (Code of Conduct) Rules 2018 which are NDIS Rules made under the National Disability Insurance Scheme Act 2013 (NDIS Act). The obligations in the Code are fundamental to the rights of people with a disability set out in the UN Convention on the Rights of Persons with Disabilities.

The Code consists of seven elements that apply to ALARA QLD Limited (ALARA) as an NDIS Provider and workers engaged to deliver services and supports under the NDIS and the Commonwealth Continuity of Support (CoS). The term 'workers' includes, but is not limited to ALARA's employees, key personnel, contractors, agents and volunteers engaged by an NDIS provider.

The Code is an important part of the NDIS Quality and Safeguarding Framework and promotes the health, safety and wellbeing of people with a disability. It aims to ensure that providers and people delivering services and supports in a way that maintains the rights, standards and principles underpinning the NDIS. That is, they have the right attitudes, engage in appropriate and ethical conduct, respect the rights of people with a disability, aim to prevent harm and respond if harm occurs.

The elements of the Code of Conduct are as follows:

### THE NDIS CODE OF CONDUCT

The NDIS Code of Conduct requires workers and providers delivering NDIS supports and services to do the following in providing those supports and services:

1. Act with respect for individual rights to freedom of expression, self-determinations and decision-making in accordance with applicable laws and conventions.
2. Respect the privacy of people with disability.
3. Provide supports and services in a safe and competent manner, with care and skill.
4. Act with integrity, honesty and transparency.
5. Promptly take steps to raise and act on concerns about matters that may impact the quality and safety of supports and services provided to people with a disability.

## Overview of the Elements of the NDIS Code of Conduct

### **1. Act with respect for individual rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and convention.**

Workers have an obligation to respect these rights by:

- Delivering services in a way that maintains the rights, standards and principles underpinning the NDIS
- Communicating in a form, language and manner that enables people with a disability to understand the information and make known their will and preferences
- Taking into account the expressed values, and beliefs of people with disability, including those relating to culture, faith, ethnicity, gender, gender identity, sexuality and age, as well as disability

### **2. Respect the privacy of people with a disability.**

Workers are required to:

- Comply with Commonwealth and State and Territory privacy laws
- Deliver services in a dignified way that maintains personal privacy

### **3. Provide supports and services in a safe and competent manner, with care and skill.**

Workers are required to:

- Obtain and maintain the expertise and competence necessary for the supports and services delivered. ALARA will not roster supports to a worker without the necessary expertise, competence and completed renewables.
- Provide services consistent with relevant professional codes in positions where this is applicable
- Meet relevant work, health and safety requirements
- Provide services only when free from the influence of alcohol or drugs
- Ensure that appropriate and adequate records are kept in accordance with the requirements of their role

### **4. Act with integrity, honesty and transparency.**

Integrity, honesty and transparency are crucial to developing the trust-based relationships between people with disability and workers that are required for high-quality service delivery.

Workers are required to:

- Provide accurate information about their qualifications, skills and competencies to ALARA as the provider and clients
- Support informed consent by providing accurate information relating to service provision
- Maintain integrity by declaring and avoiding any real or perceived conflicts of interest
- Avoid giving, asking for or accepting inducements or gifts that may influence decision-making and service provision
- Avoid participating in or promoting sharp practices involving unfair treatment or taking advantage of people

### **5. Promptly take steps to raise and act on concerns about matters that may impact the quality and safety of supports and services provided to people with disability.**

Workers are required to:

- Take immediate action when a potential issue or issue arises regarding the quality and safety of services and supports
- Raise issues related to preventing abuse, neglect and exploitation of the person with a disability with ALARA as the provider and/or the Commission in accordance with ALARA's systems for complaints and incident management and follow established procedures
- Contribute to improving supports and services

**6. Take all reasonable steps to prevent and respond to all forms of violence against, and exploitation, neglect and abuse of, people with disability.**

Workers must:

- Not commit or participate in any form of violence, abuse, neglect and exploitation of people with disability
- Adhere to ALARA's policies, systems and procedures for preventing and responding to abuse, neglect and exploitation policies as well as relevant laws, and fully cooperate with the Commission in relation to incidents of violence, abuse, neglect and exploitation
- Identify and respond to situations that could lead to violence, abuse, neglect or exploitation
- Report incidents of violence, exploitation, neglect or abuse to ALARA, and, as appropriate, to other relevant authorities including the Commission where they believe that the organisation has not responded appropriately
- Contribute to the reduction and elimination of restrictive practices

**7. Take all reasonable steps to prevent and respond to sexual misconduct.**

Workers must:

- Not commit or participate in any form of any form of sexual misconduct or inappropriate relationship
- Report sexual misconduct or inappropriate relationships to their NDIS provider, the Commission and other relevant authorities

**Breaches of the Code**

Anyone can make a complaint about NDIS funded supports and services, including alleged breaches of the Code. This includes people with disability, family members, friends, workers, advocates and other providers. In the first instance, people are encouraged to use the ALARA Complaints Policy and Procedure.

The Commission has primary responsibility for overseeing compliance of providers and workers with the NDIS Code of Conduct. The Commission can commence an investigation as a result of any information it receives about a provider or worker's potential breach of the Code whether it is in relation to a complaint, a reportable incident or from any other source. The Commission will work with all relevant people and conduct investigations fairly and efficiently and in accordance with the principles of natural justice.

Consequences of breaching the Code

The Commission, an independent regulator, is empowered to take a range of sanctions and remedial action if workers or NDIS providers breach the Code.


Penalties for breaching the Code will depend on the nature of the breach. For breaches of a less serious nature, the Commission may, for example, decide to use training and education, warnings and directions. In relation to workers, the issue may be referred to a worker's professional body (where applicable), may trigger a reassessment of an NDIS worker screening clearance and/or may be referred to the police. For the most serious breaches, the Commission may choose a different response, for example, going to court to have civil penalties imposed or issuing an order that bans a person from working in the NDIS sector. In relation to serious breaches by the organisation the Commission can institute civil charges, enforceable undertakings, deregistration or ban the provider from providing services and supports in the NDIS market.

The NDIS Commissioner may publish the result of any action it has taken against an NDIS provider or worker employed or otherwise engaged by an NDIS provider on its website.

### **Relationship with other Codes of Conduct and Policies and Procedures**

In addition to the NDIS Code of Conduct, ALARA workers must comply with ALARA's Code of Conduct, the Code of Conduct for Aged Care and Code of Conduct for Working with Children and Young People. Workers must also comply with ALARA's suite of policies and procedures which have been designed to meet the organisational and funding body requirements as well as relevant legislation and regulation.

Workers who are members of a professional association (allied health professionals, nurses, accountants) are required to comply with their existing professional code of conduct as well the NDIS Code of Conduct when providing services and supports under the NDIS. They may also be required to comply with other regulatory frameworks e.g., child protection requirements.

  
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19<sup>th</sup> December 2022

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