Samantha Seymour
— Counselling and Psychotherapy —

Child Safe Environments Policy and Procedures

Terms and Definitions

Throughout this policy:

New Start Counselling and Psychotherapy will be referred to as NSCP.

All staff, volunteers, students, and contractors of NSCP will be referred to as ‘workers’.

The owner/sole trader of NSCP, Samantha Seymour, will be referred to as the ‘Manager’.

Purpose of policy

NSCP has a legal and ethical responsibility to provide a safe, friendly, and supportive environment where all children and young people are respected, valued, and encouraged to reach their full potential. We aim to take all practical steps to protect children and young people from harm by ensuring an accessible, trauma-informed, and safe environment.

Aim

NSCP will ensure the fundamental rights of children and young people are respected and protected. This will be achieved through establishing, promoting, and maintaining safe, child-friendly environments where the protection of children and young people is supported by appropriate principles, behaviours, and practices. This policy will support all persons working within NSCP to effectively respond and consistently apply legislative requirements in relation to the safety of children and young people.

Scope of policy

This policy applies to children and young people, families, the manager, workers, and visitors to NSCP.

Policy Principles

Commitment to the safety of children and young people

NSCP understands it has a duty of care to act immediately to protect and preserve the safety and wellbeing of the children and young people in its care. NSCP is committed to diversity and all children and young people are valued equally, regardless of their abilities, sex, gender or social-economic or cultural background and equity. NSCP values, respects, and encourages all children and young people. Above all, the safety and protection of children and young people is our priority.

This policy complies with the child safe environment provisions of the following:

- *Children and Young People (Safety) Act 2017,*
- *Child Safety (Prohibited Persons) Act 2016* and the
- National Principles for Child Safe Organisations

Communication

NSCP will provide details of the existence of the child safe policy and procedures, for all children and young people, and parents/guardians, via reference to the website link, as part of the Counselling Agreement and any Service Agreement/Offer (for NDIS participants). Both these documents will be sent through, usually via email or post, and signed by the participant or parent/guardian, before the start of Counselling. By signing either document, the signatory will be indicating they have read, accept, and will comply with the policy.

NSCP will make the child safe policy and procedures available to workers children and young people, parents/guardians and families and the public:

via a link under '*policies and practices'* of the NSCP website at www.newstartcounselling.net.au

Participation of families, children, and young people

NSCP understands it has a responsibility to all clients to defend their right to care and protection. To assist in strengthening this responsibility, NSCP will follow any procedures recommended by child protection authorities, when dealing with any allegations of harm or risk of harm to children and young people and will ensure that all workers undergo appropriate professional development in this area. NSCP will also document any concerns where a child may be at risk of harm that may have occurred outside of NSCP and follow procedures to ensure the child is protected from harm.

It is a firm commitment that any worker will:

- promote children and young people's self-esteem and positive self-image through their interactions and relationships with children and young people,
- Always enact trauma-informed approaches and principles
- role model appropriate behaviour and language, and
- build relationships with all children and young people based on trust and empower children and young people to discuss and communicate their needs and concerns.

Families, children, and young people will be informed about their rights and encouraged to participate and provide feedback. The initial Counselling Agreement and any Service Agreement/Offer, which will be given to caregivers, will give clear information about:

- the rights as participants of counselling, with information regarding links, via our website at www.newstartcouselling.net.au, to our:
    - code of conduct for working with children and young people
    - the Australian Counselling Association's (ACA) code of conduct,
    - complaint procedures and
    - Feedback form

Children and young people will be provided with this information, using age-appropriate language at the first counselling session.

Code of conduct

NSCP has a Working with Children and Young People: Code of Conduct. The Code of

Conduct covers standards, issues and risk factors including, but not limited to,

- standards of behaviour when working with children and young people in physical and online environments
- the commitment that all children and young people will be embraced regardless of their abilities, sex, gender, or social-economic or cultural background and equity
- The unacceptable conduct and the consequences of behaving outside expectations
- How to report any breaches of the code of conduct
- The consequences for breaching the code of conduct

Access to the Code is available:

- via www.newstartcounselling.net.au
- via the electronic version of the Counselling Agreement and any Service Agreement/Offer made and sent to participants and families.

Recruitment

NSCP meets the requirements of the Child Safety (Prohibited Persons) Act 2016 and ensures that all workers provide a current, 'not prohibited' Working with Children Check from the Screening Unit of the Department of Human Services. NSCP will ensure a new working with children check is obtained every 5 years prior to expiry, or as required by the Department of Human Services.

Recruitment of new workers

Any recruitment for new workers will include:

- a clear position description that has a clear commitment to child safety and wellbeing
- face to face interviews that include behavioural questions which relate to child safeguarding
- screening processes that include at least two referee and qualifications checks

- On the job observations and supervision
- a set six month probation period

All new NSCP workers are required to present, prior to them commencing work:

- a current, 'not prohibited' Working with Children Check.
- Current Responding to Risks of Harm, Abuse and Neglect Certificate (RRHAN-EC) certificate
- Current Safe Environments – Through their eyes training certificate
- Current National Police Check
- Australian membership into the appropriate association for example Australian Counselling Association, PACFA, etc

The induction process for new workers will include orientation in:

- NSCP's policies and procedures
- NSCP's code of conduct.
- Responsibilities when working with children and young people, including record keeping, information sharing and reporting obligations
- If NSCP becomes aware of certain information regarding any person involved with the organisation, including serious criminal offence, child protection information, or disciplinary or misconduct information, it will be reported immediately to the Screening Unit.
- how your organisation advises the Screening Unit where the organisation becomes aware of certain information regarding any person involved with your organisation, including any serious criminal offence, child protection information, or disciplinary or misconduct information.

Supervision, training, and support for workers

NSCP requires all workers to participate in training on child protection organised by relevant child protection authorities or support agencies.

NSCP will:

- have regular supervision sessions that include a focus on child safety and wellbeing
- Adhere to the ACA's requirements for supervision as a member of the association
- Include an induction which includes new workers receiving a copy of this policy
- Support regular performance appraisals
- ensure that staff are knowledgeable about current legislation and reporting requirements related to child protection and maltreatment and that a system for reporting and recording suspicious incidents is in place
- ensure workers understand their responsibility as mandated reporters
- provide access to current information about the procedures to be taken in relation to allegations of child abuse or neglect
- ensure a guidebook to recognising signs of abuse or neglect will be made available to all workers to remind them of the possible signs of child abuse, and the procedures they should follow if a child in their care displays behaviour or physical signs that could indicate abuse has taken place (Reporting Abuse and Neglect – Participants Handbook)
- regularly remind workers about NSCP's policies, procedures, and confidentiality requirements regarding child protection
- ensure workers complete the RRHAN-EC training followed by refresher training every 3 years or as required by the Department for Education.

In relation to ongoing training NSCP will ensure all workers and volunteers:

- read and understand the Mandatory Notification Information Booklet (see: www.dhs.sa.gov.au/cse)
- complete the online SMART (Strategies for Managing Abuse Related Trauma) training (see: https://professionals.childhood.org.au/prosody/2015/07/smart-

online)

- to attend a 'Safe Environments: Through Their Eyes' training course
- to view the resources Keeping our kids safe at developed by SNAICC at https://www.snaicc.org.au/policy-and-research/child-safety-and-wellbeing/keeping-our-kids-safe/
- include child safety as a standing item on meeting agendas
- access to web-based resources about issues concerning child safety and wellbeing
- have access to professional development opportunities to build knowledge and skills regarding the wellbeing and development of children and young people
- update specific training as per requirements or every 3 years.

Reporting and responding to harm or risk of harm

Mandated notifiers have a legal obligation to notify the Child Abuse Report Line (CARL) as soon as practicable if they suspect, on reasonable grounds, that a child is or may be at risk of harm or if the child or young person is at immediate risk to notify SA Police (SAPOL). All NSCP workers are mandated reporters and as such are supported and encouraged to report the reasonable belief that a child or young person is or may be at risk of harm. At NSCP children and young people are always listened to, believed, and supported

Reporting concerns

1. In the course of work hours, if any NSCP worker forms the view that they have a reasonable belief that a child or young person is, or may be, at risk of harm — as soon as possible, they must contact the Child Abuse Report Line (CARL) on 13 14 78 or if at immediate risk, report to SAPOL on 000. For mandated notifiers, these are legal obligations
2. Any report will be made by the worker directly. It is a requirement that the individual who identifies the harm or risk of harm is the person who makes the report to

CARL/SAPOL, and this is not reported internally for another workers to determine if it is a reportable matter

3. No other workers will be given identifying information about the family unless the authorised person feels that they need to know.
4. The Manager may provide support to the worker when making the report if requested.
5. An authorised person or workers has discretion whether and if so when to notify the family involved that they are making a report. When the suspected abuse involves severe physical injury or sexual abuse, the family will generally not be notified before a report is made. NSCP will in these cases be guided by Child Protection as to when (or if) to notify the family.
6. NSCP has a right to take any action to ensure that children and young people and workers are always safe. This may involve contacting the police if any person or family makes threats against workers.
7. As part of the standard procedure, workers will make careful documentation of concerns and any action taken. An internal report is required following any report to authorities.

Any worker who causes harm to a child or young person and/or fails to report a reasonable suspicion that a child has or is being harmed or is at risk of harm is in breach of the Child Safe Environments Policy which will result in disciplinary action being initiated against the concerned worker.

Supporting children, young people, and their families

NSCP understands that we still have a role in supporting the child or young person after a report has been made. This could include:

- referring the child, young person or their family to other appropriate services
- continuing to provide a service to the child or young person and their family and monitoring their circumstances
- displaying information about services that can assist children, young people and their families (such as the Kids Helpline on 1800 55 1800 and Youth Helpline on 1300 13 17 19) in areas accessed by them.

NSCP will act thoroughly and quickly, with top importance placed on ensuring the safety and protection of children and young people.

Reporting and responding to complaints or feedback

Client feedback, both positive and constructive, is an essential part of helping NSCP continuously improve its service quality. Clients and workers can lodge any complaint/feedback in person, over the phone, by email or in writing.

Resolving complaints amicably gives NSCP the opportunity to improve services and to understand the areas that need changing. NSCP takes complaints very seriously and will work hard to address and resolve them efficiently and effectively.

NSCP will:

- Address complaints/feedback promptly, sensitively, and fairly
- listen to the complaint/feedback and make a record of it
- respond to the complaint/feedback with an outcome
- clearly document and securely store decisions and actions taken in response to complaints and feedback
- make sure that procedural fairness is always followed.
- acknowledge that we have received the complaint/feedback in writing.
- investigate complaint/feedback by reviewing the incident in depth.
- if appropriate, encourage discussion of concerns openly with the relevant workers to resolve the complaint/feedback,
- communicate the outcome of investigations to the complaint/feedback and ensure that any recommended improvements or changes are implemented effectively.

Risk management

NSCP will ensure clear observation of child-occupied areas through the following means:

- If a parent/guardian or primary support person, brings another child or young person onto the premises, that is not a client of NSCP, they will remain with that child for the duration of their stay. This is relevant when a parent/guardian or primary support person attends counselling with other siblings or children or young people in their care and remains in the lounge/designated waiting areas.

NSCP will not:

- Transport children and young people from one place/environment to another
- take images of children and young people
- supervise children and young people that are not counselling clients
- have physical contact with children and young people
- allow children and young people unsolicited use of internet or internet images while the child or young person is in the counselling or support room
- communicate with a child or young person on social media or any other

social platform.

NSCP will

- Always protect privacy and confidentiality, with an exception, of the mandatory reporting requirements
- conduct themselves in a professional and ethical manner
- adhere to trauma-informed approaches
- Always listen and believe a child or young person.

Related policies and procedures

Appendix 1: Code of Conduct for Working with Children and Young

Appendix 2: Feedback Form

Policy review

This policy will be reviewed at least once every five years in accordance with Section 115 of the Children and Young People (Safety) Act 2017 or sooner should a new risk, critical incident or concern require a review of this policy.

A new compliance statement lodgment will be lodged with the Department of Human Services every time the policy is reviewed/updated.

Last date of review: 27 April 2022

Next review date: April 2027

Appendix 1: Code of Conduct

Samantha Seymour
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Working with Children and Young People

Code of Conduct

Purpose

This document serves as the Working with Children and Young People Code of Conduct for New Start Counselling and Psychotherapy meeting the requirements of the *Children and Young People (Safety) Act 2017* and the *Child Safety (Prohibited Persons) Act 2016* to ensure safe environments for children and young people (under 18 years of age).

Aboriginal Impact Statement Declaration

Cultural considerations are a crucial part of the risk assessment process in providing a safe environment to children and young people and when responding to feedback. New Start Counselling and Psychotherapy is committed to working with cultural competency practices, strategies, and activities that adhere to the Principles for Child Safe Organisations.

Scope

This policy applies to all New Start Counselling and Psychotherapy personnel working with children and young people across all settings and activities.

General definitions

Throughout this policy:

- New Start Counselling and Psychotherapy will be referred to as NSCP.
- All staff, volunteers, students, and contractors of NSCP will be referred to as 'workers'.

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- The owner/sole trader of NSCP, Samantha Seymour, will be referred to as the 'Manager'.

Legislative definitions

This policy uses critical definitions drawn from the *Children and Young People (Safety) Act 2017* *including:*

The definition of 'Child or Young Person'

- child or young person means a person who is under 18 years of age.

The definition of 'Harm'

- For the purposes of this Act, a reference to harm will be taken to be a reference to physical harm or psychological harm (whether caused by any act or omission) and, without limiting the generality of this subsection, includes such harm caused by sexual, physical, mental, or emotional abuse or neglect.

- psychological harm does not include emotional reactions such as distress, grief, fear, or anger that are a response to the ordinary vicissitudes of life.

The definition of 'At Risk'

For the purposes of this Policy, a child or young person will be taken to be at risk if:

- the child or young person has suffered harm (being harm of a kind against which a child or young person is ordinarily protected); or
- there is a likelihood that the child or young person will suffer harm (being harm of a kind against which a child or young person is ordinarily protected).

The definition of 'Parent'

Includes, but is not limited to:

- Biological parent; and
- a step-parent of the child or young person; and
- a person who stands *in loco parentis* to the child or young person.

The definition of 'Guardian'

- Guardian or guardians of the child or young person pursuant to an order of the Court under the Safety Act.

The definition of "Worker'

The general term is applied to all workers who are legally required to report reasonable suspicion of risk of harm to a child or young person. In general defined as:

- a self-employed person; or
- carries out work under a contract for services; or
- undertakes practical training as part of an educational or vocational course; or
- carries out work as a volunteer,

The definition of Mandatory Reporting/Notification

The general term is applied to the process of reporting reasonable suspicion of risk of harm to a child or young person. NSCP will be guided by the Mandatory Reporting Guide

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Code of Conduct Detail

Expectations of New Start Counselling and Psychotherapy

Reference to NSCP includes all workers, working under its ownership.

NSCP will:

- ensure risk assessments are undertaken to identify and mitigate risks to child and young people's safety within its organisation.
- implement and demonstrate supportive communication practices between themselves, children, young people, families, and other stakeholders that encourage honesty and feedback.
- empower (any) staff to listen to and act upon any concerns raised by children, young people, or their families or carers.
- ensure that the needs and perspectives of the diverse groups of children and young people in South Australia are considered when designing, implementing, monitoring, and evaluating programs and services; and
- Investigate when the Code of Conduct is not upheld.

When collaborating and sharing information about children and young people, NSCP will:

- work with relevant statutory authorities, other state government agencies and non-government organisations to promote and protect the safety of children and young people.
- undertake consultation with PEAK bodies to ensure the sharing of information is provided in a culturally safe and appropriate manner.

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Expectations of Personnel

NSCP will:

- comply with the conditions set out under Chapter 8 of the *Children and Young People (Safety) Act.*
- demonstrate the highest standards of behaviour in their professional and personal lives.
- report any actual or suspected incident or risk of harm to a child or young person in accordance with the Mandatory Notification Guide.
- value and respect the contributions of children and young people in continuous improvement activities and service development.
- ensure every decision is made in the best interests of the child or young person.
- participate in training and ongoing professional development activities to obtain and maintain the necessary skills and knowledge to meet the mandatory requirements of their role as it relates to their interaction with children and young people.
- promote the safety of children and young people, working with statutory authorities, other state government agencies and non-government organisations as required; and
- promote the sharing of information about child safety and wellbeing when working with children, young people, families, and the community.

When engaging with children and young people, NSCP will:

- provide information to children, young people, families, and carers about program/service activities, their rights, and responsibilities.

- ensure children, young people, families, and carers have access to appropriate support and feedback mechanisms, including confidential complaint procedures and professional counselling and psychotherapy.
- listen to and act upon any concerns raised by children, young people, or their families or carers.
- provide feedback to children, young people, and families on the actions being taken to address concerns raised; and
- demonstrate understanding and valuing of diversity, being aware of their own biases, and taking steps to ensure this does not influence their actions and behaviours.

Breaches of the Code of Conduct

Unacceptable behaviour, which may be deemed to be a breach of this code, includes:

- undertaking an unlawful activity with or in relation to a child or young person.
- engaging in activity likely to cause any physical, sexual, or emotional harm to a child or young person.
- abusing the trust of a child or young person.
- being alone with a child or young person unnecessarily.
- arranging personal contact, including online contact, with children or young people they work with for a purpose unrelated to their work activities.
- discriminating against any child or young person or their family members.
- disclosing personal or sensitive information about a child or young person, including images of a child or young person, without the consent of the child or young person and/or the consent of their parent or legal guardian (except where this is required for mandatory reporting or other legal requirements).
- using inappropriate language in the presence of children or young people.

- showing or providing children or young people with access to inappropriate images or material.
- undertaking work activities with children or young people when under the influence of alcohol or prohibited drugs; and
- ignoring or disregarding any suspected or disclosed the risk of harm to a child or young person.

Reporting breaches to the Code of Conduct

All children, young people, parents, guardians of children, or young people are encouraged to report any breach of the code of conduct. To do so the following procedures are encouraged:

- Report the incident to NSCP immediately via telephone or feedback form at https://www.newstartcounselling.net.au/policies-practices

Other avenues for reporting breaches can be made via:

- Australian Counselling Association ACA - Complaint process and ethical codes provided at: www.theaca.net.au
- NDIS complaints process: www.ndiscommission.gov.au/complaints-feedback/complaints
- Health and Community Services Complaints Commissioner via hscss.sa.gov.au or by phone at (08) 8226 5666 or 1800 232 007 (for country callers)

Code of Conduct Review

This code will be reviewed on an as needs basis, or every three years, whichever is the earlier

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Reference documents

- Children and Young People (Safety) Act 2017
- Child Safety (Prohibited Persons) Act 2016
- Mandatory Reporting Guide
- National Principles for Child Safe Organisations (PDF 1.9MB)
- National Principles for child-safe organisations

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Appendix 2: Feedback Form

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Client Feedback Form

This form allows you an opportunity to provide feedback to your counsellor or to New Start Counselling and Psychotherapy after a counselling session, or after any interactions with NSCP. This will help your counsellor's professional development, as well as help, improve the service offered through NSCP. Your feedback is important to us, and we will take it seriously. You DO NOT have to identify yourself.

Please place a mark in the box which is most closely corresponds to how you feel about each statement.

About the working relationship with your counsellor

My Counsellor:	Strongly Agree	Somewhat Agree	No Strong Feeling	Somewhat Disagree	Strongly Disagree
listened to me effectively	☐	☐	☐	☐	☐
understood things from my point of view	☐	☐	☐	☐	☐
focused on what was important to me	☐	☐	☐	☐	☐
accepted what I said without judging me	☐	☐	☐	☐	☐
showed warmth toward me.	☐	☐	☐	☐	☐
fostered a safe and trusting environment.	☐	☐	☐	☐	☐
began and finished our sessions on time.	☐	☐	☐	☐	☐
followed my lead during our sessions whenever that was appropriate.	☐	☐	☐	☐	☐
provided leadership during our sessions when/if that was appropriate	☐	☐	☐	☐	☐
challenged me when/if that was appropriate.	☐	☐	☐	☐	☐

Any other comments:

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About the results of working with your counsellor

	Strongly Agree	Somewhat Agree	No Strong Feeling	Somewhat Disagree	Strongly Disagree
The sessions with my counsellor helped me with whatever originally led me to seek counselling.	☐	☐	☐	☐	☐
Any changes which might have occurred in me because of my counselling have been positive and welcome.	☐	☐	☐	☐	☐

Any other comments:

Overall Satisfaction

	Very Satisfied	Somewhat Satisfied	No Strong Feeling	Somewhat Dissatisfied	Strongly Dissatisfied
My overall level of satisfaction with the service provided by my counsellor is:	☐	☐	☐	☐	☐

	Yes	No	Not Sure
Based on my experience, I would recommend my counsellor to others	☐	☐	☐

Any other comments:

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Other comments

Please use the space below for any other comments you would like to bring to your counsellor's attention. (If there are any matters which you specifically would not have wanted to discuss with your counsellor in person, your counsellor would be especially glad to know of these). If you include your name in this section, it will be treated as *CONFIDENTIA*L. I you need more space, please continue using the back or add another page.

Comments:

Name..... Phone Number.....

Date..... Would you like us to contact you to discuss your feedback? Yes ☐ No ☐

*Please **do not** fill this out if you wish to remain anonymous*