

Child and Youth Risk Management Strategy

Approving Authority:	Managing Director
Approval date:	24/06/2024
Policy owner:	General Managers – Service Delivery
Next scheduled review:	24/06/2025
Document URL:	TP Connect – Controlled Document Hub
Description:	This strategy demonstrates Therapy Pro Group’s approach to minimizing risk or harm to children and young people.

Introduction:

Therapy Pro Group, which includes Therapy Pro and Adaptability Therapy is committed to providing high quality therapeutic intervention to clients across the age span. This strategy applies to all therapists, allied health assistants, relevant administrative staff, parents/carers and other family members and visitors. This strategy applies in all Therapy Pro Group environments, physical, on-line and off site (e.g., Community Access).

The protections included in this strategy apply to all children and young people under 18 years of age who access Therapy Pro Group’s services, and children unconnected with Therapy Pro Group if an employee, in the course of their Therapy Pro Group role, become aware of reasonably suspect harm.

In compliance with the requirements of the *Working with Children (Risk Management and Screening) Act 2000* (QLD) and the *Working with Children (Risk Management and Screening) Regulation 2020* (QLD), Therapy Pro Group has developed a *Child and Youth Risk Management Strategy* (CYRMS) which references system wide policies and procedures which support the safety, protection and wellbeing of students. The Therapy Pro Group CYRMS also adheres to the National Principles for Child Safe Organisations.

Therapy Pro Group’s Child and Youth Risk Management Strategy sets out our:

1. Commitment to creating a safe and supportive environment for all children and young people who access services – directly and indirectly
2. Code of Conduct for Interacting with Children
3. Procedures for recruiting, selecting, training and managing staff
4. Procedures for handling disclosures or suspicions of harm
5. Plan for managing breaches of this Risk Management Strategy
6. Policies for compliance with the requirements of the blue card system
7. Risk management plans for high-risk activities and special events
8. Strategies for communication and support.

National Principles for Child Safe Organisations

This Strategy aligns with the National Principles for Child Safe Organisations, developed in response to recommendations identified by the Royal Commission into Institutional Responses to Child Sexual Abuse 2018 (the “Royal Commission”). The purpose of the National Principles is to provide a nationally consistent approach to embedding a child safe culture across all sectors of Australian society in which children are involved.

A child safe organisation puts the best interests of children and young people first. A child safe organisation is one that creates a culture, adopts strategies and takes action to promote child wellbeing and prevent harm to children and young people.

The National Principles for a child safe organisation are:

1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes for complaints and concerns are child focused.
7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the national child safe principles is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

Therapy Pro Group aspires to be a leader in best practice as a child safe organisation and will continue to identify opportunities to further embed the National Principles in partnership with staff, clients and their families.

Implementation

All policies and procedures which relate to the CYRMS are accessible from the staff intranet (Therapy Pro Group Connect and Adaptability Therapy Sharepoint). Managers support in ensuring implementation of the strategy at all levels. Therapy Pro Group’s commitment to acting in accordance with the Working with Children (Risk Management and Screening) Act 2000 to ensure the safety and wellbeing of children and young people, mean Therapy Pro Group will implement this Strategy as outlined below.

The overleaf table maps the legislative requirements for a Child and Youth Risk Management Strategy, with relevant sections of this Strategy, and the National Principles for Child Safe Organisations.

Legislative requirements for a Child and Youth Risk Management Strategy	Relevant section of Therapy Pro Group's Child and Youth Risk Management Strategy	Alignment to the National Principles for a Child Safe Organisation
1. Therapy Pro Group's statement of commitment to the safety and wellbeing of children and the protection of children from harm	Statement of Commitment to Child Safety	<p>Principle 1. Child safety and wellbeing is embedded in organisational leadership, governance and culture. Principle 2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.</p> <p>Principle 4. Equity is upheld and diverse needs respected in policy and practice.</p> <p>Principle 8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.</p> <p>Principle 10. Policies and procedures document how the organisation is safe for children and young people.</p>
2. Therapy Pro's Code of Conduct for working with Children	Therapy Pro Group's Code of Conduct for Working with Children	<p>Principle 10. Policies and procedures document how the organisation is safe for children and young people.</p>
3. Therapy Pro Group's procedures for recruiting, selecting, training and managing staff and volunteers	Recruitment and Selection Employment Screening Training and Management	<p>Principle 5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.</p> <p>Principle 7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.</p>
4. Therapy Pro Group's policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines	Reporting Concerns Handling disclosures and suspicions of harm	<p>Principle 10. Policies and procedures document how the organisation is safe for children and young people.</p>
5. Therapy Pro Group's plan for managing breaches of this Risk Management Strategy	Managing breaches of the risk management strategy	<p>Principle 10. Policies and procedures document how the organisation is safe for children and young people.</p>
6. Risk management plans for high-risk activities and special events	Risk Management	<p>Principle 8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.</p>
7. Policies and procedures for managing compliance with the blue card system	Compliance with the requirements of the blue card system	<p>Principle 5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.</p> <p>Principle 10. Policies and procedures document how the organisation is safe for children and young people.</p>
8. Strategies for communication and support	Communication and Support	<p>Principle 1. Child safety and wellbeing is embedded in organisational leadership, governance and culture. Principle 2. Children and young people are</p>

		<p>informed about their rights, participate in decisions affecting them and are taken seriously.</p> <p>Principle 3. Families and communities are informed and involved in promoting child safety and wellbeing.</p> <p>Principle 6. Processes for complaints and concerns are child focused.</p>
<p>9. Continuous improvement A child and youth risk management strategy must be reviewed at least on an annual basis and after any incidents to ensure that risks continue to be addressed and minimised throughout the organisation.</p>	<p>Annual Review of the Child and Youth Risk Management Strategy</p>	<p>Principle 9. Implementation of the national child safe principles is regularly reviewed and improved</p>

Statement of commitment

Therapy Pro Group will create and maintain a child safe organisation, where the rights of children and their interests are paramount. Children should expect to feel safe and respected when receiving services from Therapy Pro Group. In accordance with legislation in each State and Territory jurisdiction of Australia, Therapy Pro Group will ensure that all children with whom we work, are safe from potential or actual child abuse.

Therapy Pro Group has a zero tolerance to child abuse. Child abuse is any act committed against a child involving physical violence, sexual offences, serious emotional or psychological abuse or serious neglect as well as exploitation and discrimination (as defined by the Act). Therapy Pro Group has a duty of care to keep children safe and all Therapy Pro Group staff are individually and collectively responsible for reporting any incidents that threaten children’s safety and wellbeing.

Therapy Pro Group is committed to the safety of Aboriginal and Torres Strait Islander children, culturally and linguistically diverse children and children with a disability. We will work to ensure that the cultural and disability needs of those children are considered when responding to allegations or incidences of child abuse. Any potential or actual child abuse or risk of child abuse will be reported by Therapy Pro Group staff immediately to the General Manager and as required to the relevant authorities.

All Therapy Pro Group staff, including the Board and Leadership team will undergo and maintain appropriate and relevant training in relation to the protection of children. All Therapy Pro Group management and staff will abide by the organisation’s Codes of Conduct. Any breach of these Codes of Conduct will result in disciplinary action, which may include termination of an individual’s employment.

Codes of conduct

These documents explicitly and unambiguously outline the standards of behaviour expected of all Therapy Pro Group staff in their interactions with children.

Principles underpinning these Codes of Conduct:

Therapy Pro Group staff will create friendly and welcoming environments for children with whom they come into contact when providing services and will uphold our responsibility to protect the rights and wellbeing of children, demonstrating compassion for, and an understanding of the vulnerability of children.

Therapy Pro Group staff respect the boundaries of the professional relationship we form with children and a child's rights to feel safe when in contact with or receiving our services. Therapy Pro Group staff work with each other, with other organisations, families and communities to create a culture of both individual and collective responsibility for the safety and well-being of children. Therapy Pro Group staff will seek justice for children who have been harmed and continue to improve our services and approach, ensuring the ongoing safety and protection of children.

Code of Conduct for Working with Children

Therapy Pro Group staff must not:

- abuse, harm or neglect any child;
- inappropriately photograph children;
- engage in a sexual relationship or sexual interactions with a child or expose children, by any means whatsoever, to sexual situations for example, sexual comments, sexual jokes, sexual acts, undressing in front of children, showing pornography to children, sexual gestures, failing to afford children appropriate privacy when they are undressing, showering or toileting;
- seek to touch or use a child in any way to meet the needs of the adult and ensure that where necessary, permission for physical contact with a child is sought and only undertaken to the extent necessary to provide therapy intervention services to the child which are appropriate for the age, maturity, health and other needs of the child;
- spend time inappropriately alone with a child;
- be inconsistent in dealing with different children for example, they must not bestow special gifts and favours, show favouritism, encourage development of special relationships with individual children;
- maintain relationships with children outside of the work context, including through social or electronic media or take a child to his or her home or encourage meetings outside of Therapy Pro Group service provision;
- be under the influence of drugs or alcohol while at work;
- supply drugs or alcohol to a child;
- engage in 'grooming' behaviour; or
- engage in any other behaviour that the broader community would consider to be inappropriate or inconsistent with community standards for the proper treatment of children.

To adhere to the code of conduct Therapy Pro Group staff must:

- maintain respectful, professional and ethical relationships with children;
- provide a nurturing environment for children receiving Therapy Pro Group services;

- familiarise themselves with and uphold relevant legislation relating to child safety and child protection in the State where they provide Therapy Pro Group services;
- meet mandatory reporting obligations where they exist in accordance to professional codes of conduct and relevant legislation in the State where they provide Therapy Pro Group services;
- follow Therapy Pro Group policies and procedures for preventing, responding to and reporting abuse, harm and neglect of children;
- fulfil the requirements of Working with Children checks where their role means they encounter children and/or provide services to children;
- use appropriate language around children;
- provide services and therapy interventions that meet the needs of children who are Therapy Pro Group clients;
- disclose any pre-existing relationship with a child, to the General Manager prior to engaging in service provision; and
- report any breaches of this code of conduct no matter how seemingly insignificant to the General Manager of Therapy Pro Group immediately.

Failure to comply with this Code of Conduct can lead to disciplinary and other action, including termination of working arrangements.

Recruiting, selecting, training and managing staff.

Therapy Pro Group has a Recruitment and Employment Screening Policy and Procedure which outlines all aspects of recruitment, and selection of our staff including policy and procedures in relation to our requirements under:

- Disability Services Act (Qld) 2006;
- Disability Services Act (Vic) 2006;
- Disability Inclusion Act 2014 (NSW)
- Criminal History Checks – national and international;
- Working with Children checks;
- Professional registration requirements; and
- Reference checks.

Therapy Pro Group applies child-focused procedures when recruiting, selecting, training and managing therapists. At Therapy Pro Group our therapists are encouraged to work across the life span while some therapists come to our organisation with experience and/or expertise in working with children and young people.

This policy has grouped the processes into ‘pre-appointment’ (recruitment and selection) and ‘post-appointment’ (training and management).

Working with Children Checks are most effective when supplemented by child-focused recruitment policies. While the compliance screening process is an assessment of a person’s eligibility to work with children and young people, the recruitment and selection of our staff is our first opportunity to ascertain a person’s suitability to work with children and young people in our organisation. Our training and management then allow us to monitor and develop our staff members’ skills and performance.

At Therapy Pro Group our effective recruitment, selection, training and management strategies will:

- deter and identify applicants that are not suitable for our organisation;
- assist to find the people that are qualified and who will contribute to facilitating a safe and supportive environment for children;

- ensure that staff receive adequate and appropriate training to deliver child- related services in a safe and productive way; and
- ensure that any issues with staff performance or conduct are identified early and actioned appropriately.

Pre-Appointment

Recruitment

The goal of this process is to identify and recruit someone who has the skills and attributes to fulfil the role requirements. Within our recruitment procedures, Therapy Pro Group believes it is important to consider the following:

Position descriptions

Selecting the right people for our organisation is easier with the development of position descriptions. Having a clear position description allows us to detail the skills and experience needed by our staff to perform their duties and contribute to an environment which is safe and supportive for children and young people.

Generally, a position description starts with a brief statement about our organisation. This includes our statement of commitment. It then details what the tasks or duties are of the role. Finally, it will outline what skills and attributes a person needs to fulfil the role.

A position description (sometimes referred to as 'job description', or 'duty statement') is developed for all positions in our organisation. A position description assists us to:

- establish an understanding of the role and expectations for staff to provide a safe and supportive environment for children and young people;
- become more aware of the tasks required for specific activities;
- develop 'requirements of the position' (sometimes referred to as selection criteria);
- identify training needs; and
- attract and retain staff.

Our organisation regularly reviews our position descriptions to assist with ongoing performance improvement.

Selection criteria

At Therapy Pro Group the job advertisement and selection criteria are framed to assess commitment, understandings, attributes, attitudes and values required of the position, particularly as they relate to children. Therapy Pro Group uses values-based recruitment alongside psychometric testing to determine suitability for roles. Complete details of this are outlined in Therapy Pro Group's Recruitment and Employment Screening policy:

- employees will be required to undergo a working with children check as an inherent requirement of the role;
- Therapy Pro Group will require the employee to provide evidence that they hold the check at any time during the employee's employment;
- Therapy Pro Group reserves the right to terminate employment without notice if the employee fails to maintain this clearance and is unable to perform the requirements of their role;
- in the instance of a disclosable court outcome for staff that impacts their ability to maintain their professional body registration and compliance, Therapy Pro Group reserves the right to not continue with an offer of employment or to terminate employment without notice; and
- the employee must notify Therapy Pro Group immediately if they no longer hold or are no longer eligible to hold this clearance.

National Police Checks

- employees who are not required to have compliance screening under The Act and/or professional body registration, will be required to undergo a National Police check as an inherent requirement of their role;
- Therapy Pro Group will require the employee to repeat this check at any time during their employment;
- in the instance of a disclosable court outcome for staff that impacts their ability to maintain their professional body registration and compliance, Therapy Pro Group reserves the right to not continue with an offer of employment or to terminate employment without notice; or
- Therapy Pro Group reserves the right to terminate employment without notice if the employee does not pass this check to satisfaction and is unable to perform the requirements of their role.

Employees must notify Therapy Pro Group immediately if the employee is charged with any criminal offence.

All details of ongoing checks are outlined in *the Recruitment and Employment Screening policy* document.

Recruitment

Therapy Pro Group will adopt a consistent, non-discriminatory approach to recruitment. This process will also provide an opportunity to select people who will promote and protect the rights, interests and wellbeing of children and young people. Therapy Pro Group will ensure that employees making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions. This includes not confining recruitment to areas or media sources which provide only, or mainly, applicants of a particular group.

Therapy Pro Group will adopt a consistent, non-discriminatory approach to the advertising of vacancies. All applicants who apply for jobs with Therapy Pro Group will receive fair treatment and will be considered solely on the applicant's ability to do the job. Selection decisions will not be influenced by any perceived prejudices of other staff.

Reference Checks

A minimum of one reference check must be undertaken before any selection decision is made and appointment occurs. The reference check should verify the suitability of individual to work with children and young people.

Consent

Informed verbal consent must be obtained prior to undertaking pre-employment screening. Written consent is required for police checks. Applicants who require a working with children check must complete a written application form.

Probationary period of employment

A probation period allows us to assess the performance of a new employee and their suitability before permanently confirming their employment.

Post-Appointment

Training

Therapy Pro Group staff receive a full induction to the organisation, its policies, procedures and system requirements. Ongoing training is also made available, as well as clinical supervision,

masterclasses on a variety of topics to ensure continuous improvement, business coaching to assist staff to develop business acumen.

It is essential that staff provide a positive contribution to the service environment and commit to promoting the safety and wellbeing of children and young people. Therapy Pro Group training promotes and contributes to the enhancing of the skills and knowledge of employees while also reducing exposure to risks.

Mechanisms to support this include:

- undertaking an assessment of the specific risks and subsequent training needs which are relevant to our service environment;
- maintaining a calendar of what training is on offer as well as the promotion of upcoming events via our in-house 'teams' platform;
- clearly identifying mandatory training to all staff, specifying how frequently it will occur, for example, training in relation to our risk management strategy and reporting disclosures or suspicions of harm must occur with initial induction and then refresher training must be undertaken annually; and
- maintaining a register of who has completed what training.

Management

It is the responsibility of the Managing Director, General Manager and Board to ensure management procedures are in place to support and encourage safe and supportive environments for children and young people. At Therapy Pro Group we focus on an organisational culture which promotes management processes which are consistent, fair and supportive.

To provide the highest quality of care to children and young people, it is important to continually promote and demonstrate respect for the rights and expectations of children and young people, parents and carers.

Clinical supervision and support, coaching and access to professional development for all staff, reflects the active engagement and inclusive participation of children and young people as described within our policies and procedures.

Our website provides access to our statement and commitment to children and young people, as well as our policies on how we work with children and keep children and young people safe.

Therapy Pro Group employee handbooks, policy and procedures as well as our induction include specific detail on:

- professional development and performance appraisals, including regularly reviewing the skill sets of staff, identifying training needs and setting goals in relation to issues which impact on the safety and wellbeing of children and young people;
- complaints management;
- performance management, including processes for addressing issues related to performance which may impact on the safety or wellbeing of children; and
- disciplinary procedures (including in relation to criminal matters).

Goal setting

Therapy Pro Group staff can access a business coach on a regular basis. With their Coach, staff will undertake a goal-setting process to encourage staff to improve their performance in a positive manner. This is a strength-based collaborative process for staff to set targets and plan on how they will achieve them.

Risk Management

Therapy Pro Group is committed to identifying and assessing risk, as well as eliminating, minimising and monitoring risks to the safety of children on an ongoing basis. Therapy Pro Group utilises various risk management tools and stores appropriate records of decisions along with actions taken in relation to risk. Policies and procedure include:

- *Risk Management when Working with Children Policy*
- *Abuse, Harm and Neglect Management and Reporting Policy and Procedure*
- *Incident Management Policy and Procedures*
- *Code of Conduct for Working with Children*
- *Lone Worker Procedure*
- *Risk Assessment Tool*
- *Statement of Commitment to Child Safety*
- *Positive Behaviour Support Policy and Procedure*
- *Statement of Commitment for the Reduction and Elimination of Restrictive Practices*

Language

Therapy Pro Group staff will communicate with children using child-centric approaches and language. Any staff unfamiliar with what this type of language involves should engage with the Early Childhood Practice Lead or practice peers to discuss, understand and learn about the expected standards of language and the types of language which is encouraged at Therapy Pro Group and those that are not permitted.

Supervision of children

When Therapy Pro Group staff are working with children, they must ensure the child is always adequately supervised. Adequate supervision may include:

- ratios of 2 adults (staff and parent) to 1 child to ensure adequate supervision and limit opportunities for unsupervised access to children;
- setting clear expectations when parental supervision and participation is required, and parents to remain while therapy is being conducted;
- it is understood that there are times when a parent will have to leave the room that therapy is occurring in due to a) ensuring the safety and wellbeing of other family members or, b) to respect the confidentiality wishes of the child for therapeutic purposes. This is not appropriate if the child engages in behaviours of concern, has a medical condition or there are other identified risks within the environment. If this is the case, a review of the Family Support Plan and therapeutic interventions will need to be completed;
- In the event that adequate parental supervision cannot be maintained within therapy sessions, therapy supports may cease until a permanent supervision plan can be identified.
- specifying the arrangements when therapy with children may take place;
- providing clear details of the physical locations for this to happen and the supervision arrangements in place;
- it is expected that children under the age of fourteen will have parental supervision within the home environment at all times throughout therapy sessions. Therapy sessions will not proceed if a parent/ caregiver is not present within the home; and
- reporting to the Head of Discipline or General Manager if a child remains uncollected or unsupervised, and/or if the person supervising the child (parent or carer) is intoxicated or under the influence of drugs.

Physical contact

There are times when it may be necessary to have physical contact with a child other than what contact occurs during some types of therapy. This may include:

- injury management;
- to demonstrate a skill or for instructional purposes as part of an activity; or
- to assist with toileting of young children.

Inappropriate physical contact includes:

- violent or aggressive behaviour such as hitting, kicking, slapping or pushing;
- kissing; or
- touching of a sexual nature.

At Therapy Pro Group in our service environment it is practical and necessary to provide an explanation to a child about what physical contact will occur and why it will occur.

Additionally, permission from a child and/or parents will be sought at the time, in relation to the physical contact and this is clearly documented. You should also consider what supervision is necessary while physical contact is occurring.

All Therapists have access to our *Therapy Pro Group: How We Work with Children and Keep Children Safe* factsheet. This is available for children and families, to help them understand our role as Therapy Pro Group staff, and what they can expect of us.

One-on-one contact with a child

At Therapy Pro Group when working with children we provide services and therapeutic interventions that meet the needs of children. At all times we aim to achieve an appropriate balance between maintaining privacy for the child or young person (if it is required) and maintaining their safety.

Therapy Pro Group staff aim to minimise the risks of one-on-one contact with a children, for example, where possible, ensuring that the child and staff member are visible to others during the therapy intervention.

Relationships

At Therapy Pro Group we maintain a respectful, professional and ethical relationship with children and young people. Close personal relationships with children and young people outside of the service environment are inappropriate and will not be tolerated at Therapy Pro Group. At times, situations may present themselves where we feel professional boundaries are being infringed upon. If this occurs, we will seek guidance from our Leadership Team and National Head of Kids Services to define the most appropriate action.

Transport of children and young people

At Therapy Pro Group we would not generally transport children, or their family members in our vehicles. If there was an unforeseen emergency in which transport seems to be the only alternative, guidance must be sought from the Team Lead or National Head of Discipline for approval which must be documented clearly in the CMS.

If transport was required, the following is mandatory:

- ensuring that approved child restraints are used;
- consent from the child's parents will be sought and documented;
- consent from your Team Lead or National Head of Discipline sought and documented; and

- all drivers are correctly licensed, vehicles are registered and insured and safe for the children and/or young people.

Change rooms/toilets

At times therapy may be undertaken in environments where the child and family members are not in their own home. Clear communication will be provided to the child and family prior to therapy starting so they understand where change rooms or toilets are available. During service provision, a child may need to engage in tasks related to dressing or toileting to support their therapeutic goals. In this instance, it is expected that the child's parent/caregiver is also present and supported during these tasks.

Managing injuries or illnesses

Therapy Pro Group staff members should have access to a personal First Aid kit at all times. If a child becomes ill or sustains an injury when having therapy, the most immediate response is the provision of adequate first aid (where trained), calling emergency responders as required (e.g. an ambulance on 000). Therapy Pro Group staff will provide supervision of the children and family member until assistance arrives. Immediate contact with the Team Lead, National Head of Discipline, or General Manager should be followed by the lodgment of an Incident Form and appropriate notification to the relevant Department if the incident is defined as a Critical Incident.

Photography policy

Therapy Pro Group has a consent form for clients to agree to any photography of themselves or family members. This type of photography is only appropriate when it pertains to demonstration of therapeutic outcomes, or a client or family wishing to demonstrate satisfaction with the service they have received.

Within the consent for photographs, inclusion of where the images will be used will be clearly outlined to the client and their family, so they understand and agree to its placement. Images would be used on the Therapy Pro Group website, intranet, social media pages and/or on marketing materials only if specifically consented to for that purpose.

Use of technology and social media

At times, therapists may require the use of technology to deliver intervention with children and young people. Therapy Pro Group staff should follow appropriate conduct for technology and internet use when working with children, avoiding accessing social media websites. If in the event that inappropriate usage of electronic devices of inappropriate conduct on social media occurs by either staff member or child/young person, Therapy Pro Group staff will seek guidance from our Leadership Team and National Head of Kids Services to define the most appropriate action.

General safety

At Therapy Pro Group we carefully consider the general safety of children and young people within our service environment. As we provide therapy in the environment of the clients choosing, we have risk assessment protocols which identify and mitigate:

- any risks posed by the physical environment or equipment used in the service environment;
- the security of the physical premises in which the services are offered; and
- that children and young people will only access safe play spaces and equipment, as and if required.

Confidentiality of information

Therapy Pro Group will collect information in a fair, legal and transparent way, and will securely maintain and store information on clients whilst they are accessing Therapy Pro Group services.

Therapy Pro Group will maintain secure information management systems and processes to make sure the privacy of clients is maintained. Clients can request access to their personal information held on file by Therapy Pro Group by telephone or in writing. Therapy Pro Group will keep client information for the required times defined in legislation for archiving of client records.

Client information will only be used for the purposes for which it was collected, or other purposes as agreed to by the client (for example referral to other services). If Therapy Pro Group is required to release personal information to comply with legislation, clients will be informed of this requirement. How, why and what Therapy Pro Group collects client information for will be clearly explained to clients. The exception to this is where a therapist establishes risk of harm, abuse or neglect to the client or others, where a failure to disclose relevant client information would result in identifiable risk or harm to the client or others. Where this can be prevented, therapists may need to provide the minimal information necessary to avert harm, abuse or neglect of a person, to the relevant third parties.

Separated parents

In circumstances where a child is subject to a Parenting Court Order or a Parenting Agreement, Therapy Pro will ask that the Consent Form is completed in line with that order or agreement and may also ask for evidence of such an order or agreement to support clear decision making and exchange of information. Should such an agreement not be supplied, Therapy Pro staff will by default determine separated parents as retaining parental responsibility, which can be exercised jointly or separately (consistent with section 61C of the Family Law Act).

Managing Breaches of the Risk Management Strategy

Therapy Pro Group defines a breach as “a result of an act or failing to do an act and includes a failure to comply (non-compliance) with a legislative or other compliance obligation”. Breaches of the Child and Youth Risk Management Strategy must be managed in accordance with *Therapy Pro Group’s Abuse, Harm and Neglect Management and Reporting Policy and Procedure*. All breaches, actual and potential, must be managed in accordance with this procedure.

A breach of the Child and Youth Risk Management Strategy may include:

- Failure to meet expectations defined in the Therapy Pro Group Code of Conduct for Working with Children
- Failure to report suspicion of harm and/or concern for a child’s welfare in accordance with legislated reporting requirements
- Failure to undertake required recruitment and selection due diligence that results in the appointment of new staff member who does not hold a valid blue card
- Failure of staff to advise Therapy Pro Group of any change to their criminal history status which disqualifies the staff member from holding a blue card
- Failure to maintain compliance with mandatory annual Abuse, Harm and Neglect training

If an actual or potential breach of the Child and Youth Risk Management Strategy is identified, the following steps must be taken:

- Take immediate action to reduce, minimise or contain the actual breach and follow the requirements of Therapy Pro Group’s related procedures, namely:

- Reporting of a reasonable suspicion of child sexual abuse or assault to team lead and Head of Discipline within 4 hours, this is outlined in the document- *Abuse Harm and Neglect Management and Reporting Policy and Procedure*
- Report of suspected child in need of protection to Department of Children, Youth Justice, and Multicultural Affairs;

All breaches will be investigated, and appropriate corrective actions implemented. Corrective actions will be proportionate to the breach and will include disciplinary and other action, which may include termination of employment. Records of reported breaches will be maintained by the People and Culture Team.

Each Australian state and territory have its own mandatory reporting law. However, *the laws are not the same across all jurisdictions*. Differences include: (1) who has to report; (2) what types of abuse and neglect have to be reported (and therefore what types do not have to be reported); (3) the ‘state of mind’ that activates the reporting duty (i.e. having a concern, suspicion or belief on reasonable grounds); and (4) who to make the report to. Therapy Pro Group team leads, Head of Discipline and General Manager will support staff to make the required reporting, based on the location of the client and the nature of risk observed or suspected. Sanctions may apply under the Child Protection Act 1999 to those who fail to report suspected abuse.

Specific procedural details and guidance in relation to the eight minimum requirements are defined in the *Therapy Pro Group Risk Management Procedure* which includes the *Risk Management Plan*.

Compliance with the requirements of the blue card system

Therapy Pro Group may require employees and contractors to hold a Working with Children Check (Blue Card), or a combined Blue Card and NDIS Worker Screening Clearance prior to and during employment, in line with the Working with Children (Risk Management and Screening) Act 2000, NDIS Quality and Safeguards Commission’s NDIS Worker Screening Database (NWSD), and Child Safe Organisation principles and requirements.

Therapy Pro Group’s detailed procedures for pre-employment checks are contained with the following policies, procedures and guides:

- *Recruitment and Employment Screening Policy*
- *Code of Conduct for Working with Children*
- *Risk Management when working with Children Policy*
- *Contractor Procedure*
- *Incident Reporting and Management Policy*
- *Performance Management Process*

Further information is available on the Blue Card Services website.

Communication and Support

Therapy Pro Group’s Child Safe Organisation Commitment Statement, policies and procedures relating to child safeguarding, child protection and complaints management are public on the Therapy Pro Group website.

This strategy also links to several internal Therapy Pro Group policies which are not available on our website. These can be provided upon request from the General Manager.

The Statement of Commitment to Child Safety is reinforced through staff induction programs and mandatory staff training programs. All staff are required to undertake mandatory Abuse, Harm and Neglect Training annually.

Annual Review of the Child and Youth Risk Management Strategy

To ensure that Therapy Pro Group's Child and Youth Risk Management Strategy remains current and effective, this strategy is subject to review annually or more regularly as required. If Therapy Pro Group identifies concerns, particularly following a safeguarding incident, Therapy Pro Group's CYRMS may be reviewed, as required.

The review will be documented and involve a range of stakeholders and considers whether Therapy Pro Group's policies and procedures were followed, the response to any safeguarding incidents managed under the CYRMS and the content and frequency of training in relation to Therapy Pro Group's CYRMS.

Following the review, the Therapy Pro Group CYRMS document is published on the Therapy Pro Group's public websites for accessibility to employees, clients, families and stakeholders.

Supporting Documents

Legislation, Policy and standard(s)

- *Child Protection Act 1999*
- *Australian Charter of Healthcare Rights*
- *Working with Children (Risk Management and Screening) Act 2000*
- *Working with Children (Risk Management and Screening) Regulation 2020 (QLD)*
- *Working with Children (Risk Management and Screening) and Other Legislation Amendment Act 2020 (QLD)*
- *Human Rights Act 2019 (QLD)*

Procedures, Guidelines, Protocols

- *Statement of Commitment to Child Safety*
- *Abuse Neglect Exploitation and Discrimination Management and Reporting Policy and Procedure;*
- *Client Service Charter;*
- *Incident Reporting Policy and Procedure;*
- *Risk Register;*
- *Risk Control Resource;*
- *Codes of Conduct (Working with Children and Working with Vulnerable Persons);*
- *Recruitment Policy, Procedure and associated resources;*
- *Induction documents;*
- *Risk Management Plan;*
- *Information Security Policy;*
- *Privacy & Information Management Policy;*
- *Board Governance Policy;*
- *Contractor Procedure;*
- *Incident Reporting and Management Policy;*
- *Performance Management Process.*