ALLAY
OCCUPATIONAL THERAPY

Child Safe Standards

VERSION 5

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Child Safe Standards

Mission

Empowering people to lead independent and meaningful lives, with sustainable, satisfying daily activities and relationships.

Vision

To provide quality therapy services, as a leader in innovation and sustained by strong relationships with our clients, communities, and within our team.

Values

Collaborative – Innovation – Sustainable – Empowered

Practice Summary

Allay Occupational Therapy's policies underscore our commitment to quality occupational therapy services. Our values of Collaboration, Innovation, Sustainability and Empowerment guide us in supporting individuals to lead independent and meaningful lives.

We provide evidence-based occupational therapy services tailored to the needs, goals and circumstances of individuals across the lifespan. Our occupational therapists, allied health assistants and broader team work collaboratively with clients, children, families and support networks to promote participation, independence, safety and wellbeing.

Children and young people are central to our paediatric services. Allay is committed to providing environments in which children are safe, respected, listened to and supported to participate in decisions that affect them.

The Allay community is inclusive of all cultures, identities, abilities and backgrounds. We recognise that some children may experience increased vulnerability to harm or barriers to participation, communication or raising concerns. Our systems aim to recognise and respond to the individual needs of each child.

We are committed to continuous quality and practice improvement informed by children, families, lived experience, current research, regulatory requirements, feedback, complaints, incidents and organisational learning.

This Framework is informed by applicable legislation, standards and regulatory requirements including:

- Child Wellbeing and Safety Act 2005 (Vic)
- Child Wellbeing and Safety Regulations 2017 (Vic)
- Children, Youth and Families Act 2005 (Vic)
- Crimes Act 1958 (Vic), including failure to disclose and failure to protect offences
- Wrongs Act 1958 (Vic), including organisational liability for child abuse
- Worker Screening Act 2020 (Vic)

- National Disability Insurance Scheme Act 2013 (Cth)
- NDIS Practice Standards and Quality Indicators
- NDIS Code of Conduct
- Victorian Child Safe Standards
- Victorian Reportable Conduct Scheme
- United Nations Convention on the Rights of the Child
- Privacy Act 1988 (Cth)
- Health Records Act 2001 (Vic), where applicable.

The Victorian Child Safe Standards contain 11 mandatory Standards, all of which organisations within their scope must implement.

Where Allay provides NDIS-funded supports, this Framework also operates alongside Allay's obligations under the NDIS Practice Standards relevant to the supports and services provided.

Policy and Procedures in the Practice

We value the well-being and resilience of our team members. We prioritise their professional growth and ensure a supportive environment that promotes personal and career development. By investing in their well-being and ongoing education, we empower our team to provide the highest quality of care.

Our policies and procedures are designed to guide best practice and provide clear direction to our team. They serve as a roadmap for delivering exceptional care, upholding professional standards, and ensuring a safe and ethical practice environment. They are supported by a professional development program through policy training, case studies and reflective activities.

Purpose

The purpose of this Framework is to describe how Allay implements the Victorian Child Safe Standards in everyday practice.

It provides a practical connection between each Child Safe Standard and Allay's:

- policies and procedures;
- clinical practice;
- workforce practices;
- governance systems;
- risk management;
- incident and complaint management;
- child and family engagement;
- training and supervision; and
- continuous improvement activities.

This Framework should be read alongside the Child Safety and Wellbeing Policy and Child Safe Code of Conduct.

Scope

This Framework applies to all Allay team members, leaders, contractors, allied health assistants, administrative staff, students and volunteers where relevant.

It applies wherever Allay services or activities involve children and young people, including:

- Allay clinics;
- homes;
- schools and kindergartens;
- community settings;
- external appointments and activities;
- vehicles and transport where applicable;
- telehealth;
- electronic communication; and
- other physical or online environments associated with Allay service delivery.

For the purposes of this Framework, a child or young person is a person under 18 years of age.

Responsibility for Child Safety

Child safety is everyone's responsibility. All workers are responsible for understanding and complying with Allay's child safety requirements, identifying and responding to concerns, maintaining professional boundaries and taking reasonable steps to protect children from abuse and harm.

The Principal Occupational Therapist has overall responsibility for oversight of Allay's child safety framework, supported by the Leadership Team.

Leadership is responsible for promoting a child-safe culture, ensuring appropriate systems and resources are in place, responding to concerns, monitoring risks and ensuring Allay continues to meet its legislative and regulatory obligations.

Introduction

Allay Occupational Therapy acts to protect children from abuse, and build an environment where children feel respected, valued and encouraged to reach their full potential. Abuse may be child sexual abuse, physical abuse, serious emotional and psychological abuse and serious neglect.

Protection of children has its foundation in a culture of child safety, that is embedded throughout our organisation so that child safety is part of everyone's everyday thinking and practice. All of our occupational therapists aim to demonstrate child safe values, attitudes and behaviours.

Allay Occupational Therapy fosters a culture of openness, inclusiveness and awareness. All of our staff, volunteers and students consider the safety of all children, recognise the importance of cultural safety for Aboriginal children, cultural safety for children from culturally and linguistically diverse backgrounds, cultural safety for children from a lesbian, gay, bisexual, trans, and/or intersex background and the safety of children with a disability.

Child Safe Standard 1

Culturally Safe Environments for Aboriginal Children and Young People

Standard
Allay establishes a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued.
Allay recognises that cultural safety is fundamental to child safety and wellbeing. Aboriginal children and young people have the right to express their identity and culture, maintain connection with family, community, culture and Country, and receive services in an environment free from racism and discrimination.

How Allay Implements this Standard
Allay:

- welcomes Aboriginal children, young people and families and supports their participation and inclusion;
- encourages and supports Aboriginal children to express their culture, identity and cultural rights;
- seeks to understand each child and family's individual cultural identity, preferences and needs rather than making assumptions based on Aboriginal identity;
- provides opportunities for workers to develop understanding of the strengths of Aboriginal cultures and their importance to children's safety and wellbeing;
- recognises and celebrates Aboriginal cultures, communities, achievements and significant cultural events;
- maintains zero tolerance for racism and requires workers to identify, challenge and report racism;
- responds to identified racism through appropriate management, complaint, incident or disciplinary processes;
- seeks feedback from Aboriginal children and families about whether they experience Allay as culturally safe;
- considers Aboriginal cultural safety within organisational policies, risk management, workforce development and service design; and
- seeks opportunities for culturally informed learning, consultation and engagement with Aboriginal organisations and communities.

Allay recognises that cultural safety requires ongoing organisational action and development rather than a one-off activity or training requirement.

Evidence and Related Allay Systems

- Child Safety and Wellbeing Policy
- Child Safe Code of Conduct
- Diversity and Inclusion Policy
- Intake and assessment processes
- Staff induction and training

- Feedback Surveys
- Complaints and Incident Management systems
- Continuous Improvement Register
- cultural safety resources and professional development.

Child Safe Standard 2

Child Safety and Wellbeing Embedded in Leadership, Governance and Culture

Standard
Child safety and wellbeing are embedded in Allay's organisational leadership, governance and culture.

How Allay Implements this Standard
Allay maintains a public and organisational commitment to child safety and has zero tolerance for child abuse and harm.

Leadership models and promotes child-safe behaviours and supports a culture in which workers, children and families feel able to identify and raise concerns.

Allay:

- maintains a Child Safety and Wellbeing Policy;
- maintains a Child Safe Code of Conduct setting clear behavioural expectations;
- requires workers to understand and comply with child safety responsibilities;
- incorporates child safety into induction, supervision, training and professional development;
- maintains systems for reporting and responding to child safety concerns;
- maintains appropriate records relating to child safety;
- manages child safety risks through clinical and organisational risk management;
- monitors incidents, complaints, concerns and near misses;
- ensures significant child safety concerns receive appropriate leadership oversight; and
- considers child safety within organisational planning and continuous improvement.

The Principal Occupational Therapist has overall governance responsibility for Allay's child safety framework.

Significant or recurring child safety risks may be recorded within Allay's Risk Register and identified improvements recorded within the Continuous Improvement Register.

Evidence and Related Allay Systems

- Child Safety and Wellbeing Policy
- Child Safe Code of Conduct
- Incident Management Policy
- Risk Management processes and Risk Register

- Continuous Improvement Register
- Complaints Management Policy
- supervision and training records
- Leadership review and governance processes.

Child Safe Standard 3

Children and Young People are Empowered

Standard
Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously.

How Allay Implements this Standard
Allay's occupational therapy practice is child-centred and seeks to enable children to meaningfully participate in decisions about their services.

Allay:

- supports children to understand their rights;
- provides child-friendly and accessible information, including information about children's rights and how to raise a concern;
- involves children in goal setting and decisions about their occupational therapy wherever possible;
- seeks children's views regarding activities, environments, preferences, strengths and support needs;
- listens to children's verbal and non-verbal communication;
- takes expressions of discomfort, concern, fear or feeling unsafe seriously;
- supports children to ask questions and communicate preferences and boundaries;
- respects children's privacy and dignity;
- seeks consent and assent appropriate to the child's age, capacity and circumstances;
- supports children to provide feedback and make complaints;
- provides opportunities for children to contribute to improvements in Allay's services; and
- balances safety with children's rights to participation, relationships, choice, independence and dignity of risk.

Workers recognise that communication may look different for each child and adapt their approach to support meaningful participation.

Evidence and Related Allay Systems

- Kid's Rights Fact Sheet
- Intake and assessment processes
- goal-setting processes
- Family Inclusive Policy
- Feedback Surveys

- Complaints Management Policy
- Child Safe Code of Conduct
- Model of Practice
- clinical documentation.

Child Safe Standard 4

Families and Communities are Informed and Involved

Standard
Families and communities are informed and involved in promoting child safety and wellbeing.

How Allay Implements this Standard
Allay recognises families and communities as important partners in children's safety, wellbeing and participation.

Allay:

- provides families with accessible information about children's rights and Allay's child safety practices;
- makes relevant child safety policies and information available to families;
- involves parents, carers and other important people in decisions regarding services where appropriate and consistent with the child's rights and circumstances;
- provides children and families with sufficient opportunity to ask questions and make informed decisions;
- welcomes feedback, concerns and complaints;
- informs families about how concerns can be raised;
- seeks feedback from children and families about their experiences;
- involves families and communities in reviewing and improving child safety practices where appropriate; and
- considers feedback from children, families and communities when reviewing policy, risk management and service delivery.

Evidence and Related Allay Systems

- Child Safety and Wellbeing Policy
- website information
- Allay client information and Fact Sheets
- Kid's Rights Fact Sheet
- Complaints information
- Service Agreement
- Intake Form
- Feedback Surveys
- Family Inclusive Policy.

Child Safe Standard 5

Equity is Upheld and Diverse Needs are Respected

Standard
Equity is upheld and diverse needs are respected in policy and practice.

How Allay Implements this Standard
Allay recognises that children's experiences, identities, strengths and vulnerabilities differ and that equitable child safety requires services to respond to individual needs.
Allay welcomes and supports children including:

- children with disability;
- Aboriginal and Torres Strait Islander children;
- children from culturally and linguistically diverse backgrounds;
- children who are unable to live at home;
- lesbian, gay, bisexual, transgender, intersex, queer, asexual and gender-diverse children and young people;
- children with communication differences;
- children experiencing vulnerability or disadvantage; and
- children with other individual accessibility, cultural, social or support needs.

Allay:

- seeks information about individual communication, cultural, sensory, accessibility and support needs;
- makes reasonable adjustments to support participation;
- provides information in accessible formats where required;
- adapts communication to the child's individual needs;
- does not tolerate racism, discrimination, exclusion or harassment;
- considers intersectional factors that may increase vulnerability or create barriers to speaking up; and
- ensures child safety responses consider each child's individual circumstances.

Evidence and Related Allay Systems

- Diversity and Inclusion Policy
- Child Safety and Wellbeing Policy
- Child Safe Code of Conduct
- Intake Form
- assessment and intervention processes
- reasonable adjustment processes
- Family Inclusive Policy
- Complaints Management Policy.

Child Safe Standard 6

People Working with Children are Suitable and Supported

Standard

People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

How Allay Implements this Standard

Allay takes reasonable steps to recruit, screen, induct, supervise and support people who are suitable to work with children.

Recruitment and workforce processes include, where applicable:

- position descriptions identifying relevant child safety responsibilities;
- consideration of child safety during recruitment and interview;
- identity verification;
- Working with Children Checks;
- NDIS Worker Screening Checks;
- police checks where required;
- qualification and registration checks;
- reference checks;
- induction to Allay's child safety requirements;
- review and acknowledgement of the Child Safe Code of Conduct;
- supervision;
- professional development;
- performance management; and
- ongoing monitoring of relevant worker screening requirements.

Child safety responsibilities are reinforced through supervision, clinical review, team meetings, policy training and professional development.

Concerns regarding worker conduct are promptly assessed and managed in accordance with relevant Allay policies and external reporting obligations.

Evidence and Related Allay Systems

- Worker Engagement Policy
- Worker Screening Policy
- recruitment records
- screening registers
- Child Safe Code of Conduct
- induction records
- Supervision Policy
- Professional Development Policy
- Performance Development Policy
- Disciplinary Policy.

Child Safe Standard 7

Complaints and Concerns are Child-Focused

Standard

Processes for complaints and concerns are child-focused.

How Allay Implements this Standard
Allay maintains accessible processes through which children, families, workers and other people can raise concerns about child safety.

A child does not need to make a formal complaint before Allay acts on a child safety concern. When a child discloses abuse or harm, workers will:

- listen carefully and allow the child to communicate in their own way and words;
- take the disclosure seriously;
- respond calmly and supportively;
- avoid interrogating the child or asking unnecessary or leading questions;
- reassure the child that they have done the right thing by speaking up;
- not promise secrecy;
- explain, in a way the child can understand, that information may need to be shared to help keep them or another person safe;
- take immediate action where required to protect the child;
- record relevant information accurately, including the child's own words where possible;
- promptly escalate the concern in accordance with Allay's child safety and incident management processes; and
- make or support required external reports.

When a worker identifies a child safety concern, they must prioritise immediate safety, document and escalate the concern and comply with relevant external reporting obligations. When a parent, carer or other person raises a child safety concern, Allay will take the concern seriously, consider the child's immediate safety and wellbeing, document relevant information and determine required internal and external actions.

Internal reporting to Allay leadership does not replace an individual's legal obligation to report to an external authority where that obligation applies. Workers must not delay a report required by law while awaiting internal approval.

Allay recognises that child safety matters may require reporting or notification to authorities including Victoria Police, Child Protection, the Social Services Regulator and the NDIS Quality and Safeguards Commission depending on the circumstances.

Reportable Conduct
Allay recognises its obligations under the Victorian Reportable Conduct Scheme.

Allegations of reportable conduct involving a worker, volunteer, contractor or other person covered by the Scheme must be immediately escalated to the Principal Occupational Therapist as the Head of Organisation, or an appropriately authorised delegate.

The Head of Organisation is responsible for ensuring notifications, investigations and other actions required under the Reportable Conduct Scheme occur within applicable statutory timeframes.

External notification under one reporting scheme does not remove other reporting obligations that may apply.

Evidence and Related Allay Systems

- Complaints Management Policy
- Incident Management Policy
- Child Safety and Wellbeing Policy
- Child Safe Code of Conduct
- Child Safety Incident processes
- Kid's Rights Fact Sheet
- Feedback and Complaints Fact Sheet
- Incident Register
- Complaints Register.

Child Safe Standard 8

Workers have Appropriate Knowledge, Skills and Awareness

Standard

Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

How Allay Implements this Standard

Allay provides induction, training, supervision and ongoing learning relevant to workers' roles and responsibilities.

Child safety learning may include:

- children's rights;
- Victorian Child Safe Standards;
- Allay's Child Safety and Wellbeing Policy;
- Child Safe Code of Conduct;
- recognising signs of child abuse, grooming and harm;
- responding appropriately to disclosures;
- internal and external reporting obligations;
- professional boundaries;
- cultural safety for Aboriginal children;
- diversity, inclusion and equity;
- identifying and responding to racism and discrimination;
- risks associated with children with disability and communication differences;
- child safety risk management;
- online and physical environment risks; and
- complaints and incident management.

Child safety is reinforced through induction, supervision, clinical review, team meetings, case discussion, policy review and professional development.

Evidence and Related Allay Systems

- induction records
- training records
- professional development records
- supervision
- clinical review
- policy training
- Child Safe Code of Conduct acknowledgement.

Child Safe Standard 9

Physical and Online Environments Promote Safety and Wellbeing

Standard

Physical and online environments promote safety and wellbeing while minimising opportunities for children and young people to be harmed.

How Allay Implements this Standard

Allay takes a proactive and preventative approach to child safety risks across the environments in which occupational therapy services are provided.

Child safety risk assessment may consider:

- clinic and therapy environments;
- one-to-one therapeutic relationships;
- home visits;
- school and kindergarten sessions;
- community and external sessions;
- vehicles and transport where applicable;
- bathrooms, changing areas and activities involving privacy;
- physical contact required for assessment, positioning, assistance or therapeutic activities;
- equipment and therapy activities;
- interactions between children;
- interactions with other adults in external environments;
- photography, video and recording;
- telehealth;
- electronic communication;
- social media;
- storage and sharing of children's information; and
- other physical and online environments used in service delivery.

Workers seek appropriate consent or assent before therapeutic physical contact wherever practicable and remain responsive to children's verbal and non-verbal communication regarding comfort, boundaries and participation.

Workers use approved Allay communication systems and maintain professional boundaries in online and electronic interactions with children.

Identified risks are assessed and managed in a manner proportionate to the risk while balancing children's rights to privacy, participation, relationships, information, independence and dignity.

Workers must report child safety hazards, concerns, incidents and near misses. Significant or recurring risks are escalated to Leadership and incorporated into organisational risk management and continuous improvement processes where appropriate.

Evidence and Related Allay Systems

- Risk Management processes
- Risk Register
- External Session Management Policy
- Duress Management Policy
- Occupational Health and Safety Policy
- Social Media Policy
- Privacy Policy
- Incident Management Policy
- clinical risk assessment
- Child Safe Code of Conduct.

Child Safe Standard 10

Implementation is Regularly Reviewed and Improved

Standard
Implementation of the Child Safe Standards is regularly reviewed and improved.

How Allay Implements this Standard
Allay reviews its child safety framework to identify opportunities for improvement and ensure that policies and practices remain effective and current.

The Child Safe Standards Framework and associated Child Safety and Wellbeing Policy will undergo comprehensive review at least every two years and earlier where required following:

- a significant child safety incident or complaint;
- an identified child safety risk or near miss;
- findings from an investigation;
- changes in legislation, regulation or guidance;
- significant changes to Allay's services or operating environments;

- feedback from children, families or workers; or
- identification that an existing control, policy or process may not be effective.

Leadership reviews relevant child safety incidents, complaints, concerns, near misses and feedback to identify trends, systemic issues and opportunities for improvement.

Identified improvements are recorded and monitored through Allay's continuous improvement processes where appropriate.

Children, families, workers and relevant community members are provided opportunities to contribute feedback to the review and development of child safety practices.

Relevant findings and improvements are communicated to workers, children and families where appropriate while maintaining privacy and confidentiality.

Evidence and Related Allay Systems

- policy review schedule
- Incident Register
- Complaints Register
- Risk Register
- Continuous Improvement Register
- Feedback Surveys
- leadership review processes
- training and supervision records.

Child Safe Standard 11

Policies and Procedures Document Child Safety

Standard

Policies and procedures document how Allay is safe for children and young people.

How Allay Implements this Standard

Allay maintains a coordinated framework of policies, procedures and practice resources that describe how child safety and wellbeing are implemented across the organisation.

These documents collectively address:

- organisational commitment to child safety;
- expected worker behaviour;
- cultural safety;
- children's participation and rights;
- family involvement;
- diversity and equity;
- recruitment, screening and worker suitability;
- training and supervision;

- complaints;
- incidents;
- mandatory and external reporting;
- risk management;
- physical and online environments;
- privacy and information management; and
- governance and continuous improvement.

Policies and procedures are accessible to workers and relevant information is made available to children and families in formats appropriate to their needs.

Workers are expected to understand and comply with policies relevant to their role. Policy implementation is supported through induction, training, supervision, case discussion, leadership oversight and quality improvement processes.

Policies and procedures are reviewed and updated in response to changes in legislation, regulatory requirements, organisational learning, feedback and identified risks.

Evidence and Related Allay Systems

- Child Safety and Wellbeing Policy
- Child Safe Code of Conduct
- this Child Safe Standards Implementation Framework
- Incident Management Policy
- Complaints Management Policy
- Family Inclusive Policy
- Privacy Policy and Privacy Procedures
- Worker Engagement Policy
- Worker Screening Policy
- Supervision Policy
- Professional Development Policy
- External Session Management Policy
- Duress Management Policy
- Risk Management systems
- Social Media Policy
- Model of Practice
- relevant client Fact Sheets and resources.

Child Safety Governance and Continuous Improvement

The Principal Occupational Therapist has overall responsibility for oversight of Allay's child safety framework, supported by the Leadership Team.

Leadership monitors implementation of the Victorian Child Safe Standards and considers relevant:

- child safety incidents and concerns;
- complaints;

- allegations;
- near misses;
- feedback from children and families;
- workforce concerns;
- identified risks;
- external reporting or regulatory matters; and
- findings from investigations and policy reviews.

Where review identifies significant or systemic risk, Allay will take proportionate action to reduce or remove that risk.

Significant or recurring child safety risks may be recorded within the organisational Risk Register. Corrective actions and opportunities for improvement may be recorded within the Continuous Improvement Register and monitored until completed.

Allay seeks feedback from children, families, workers and relevant community members to inform the ongoing development of its child safety framework.

Relevant Allay Policies, Procedures and Resources

- Child Safety and Wellbeing Policy
- Child Safe Code of Conduct
- Kid's Rights Fact Sheet
- Family Inclusive Policy
- Incident Management Policy
- Complaints Management Policy
- Privacy Policy
- Privacy Procedures
- Worker Engagement Policy
- Worker Screening Policy
- Supervision Policy
- Professional Development Policy
- Diversity and Inclusion Policy
- External Session Management Policy
- Duress Management Policy
- Occupational Health and Safety Policy
- Social Media Policy
- Model of Practice
- Risk Register
- Incident Register
- Complaints Register
- Continuous Improvement Register
- Allay client Fact Sheets.

Document Review

Document Revision Information

Version	Date	Amendment	Author
1	1 March 2019	Initial document	Lauren Pattinson
2	1 April 2021	Review and update in line with Child Safe Standards	Lauren Pattinson
3	13 August 2024	Review and update in line with revised Child Safe Standards	Lauren Pattinson
4	31 October 2024	Added cultural safety, dignity of risk, time for informed decision-making and legislative requirements	Stephanie Kelly
5	August 2026	Comprehensive review and restructure as Child Safe Standards Implementation Framework. Aligned framework to all 11 Victorian Child Safe Standards; strengthened Aboriginal cultural safety, child participation, governance, workforce suitability, child-focused complaints, physical and online safety, external reporting, risk management and continuous improvement; updated evidence and cross-references to current Allay systems.	Lauren Pattinson