



# Children and Young People Safety Policy

**St John Ambulance Australia SA Inc.**

**ST JOHN AMBULANCE AUSTRALIA SA INC**  
ABN 42 947 425 570

**Head Office South Australia**  
85 Edmund Avenue Unley  
South Australia 5061

**T: 1300 78 5646**  
**F: 08 8306 6995**  
**W: [stjohnsa.com.au](http://stjohnsa.com.au)**

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## 1. Policy Objective

St John Ambulance SA (St John SA) is committed to best practice standards in protecting all adult Members, and children and young people from any form of harm or risk of harm during their involvement with St John SA.

St John SA will take all allegations of harm or risk of harm seriously and will act with authorities to ensure matters are heard and appropriately dealt with.

This Children & Young People Safety Policy must be read in conjunction with the Children & Young People Safety Procedure which provides detailed instructions on how adult Members must carry out their responsibilities in ensuring a child safe environment for children and young people engaging in St John SA's services, programs and activities for whom St John SA has a duty of care.

In establishing policies, processes and practices St John SA will be guided by the following:

- A zero-tolerance approach to harm will be adopted – this includes all forms of harm
- All reasonable action to prevent harm and minimise the risk of harm will be taken
- All adult Members are expected to uphold the standards set by St John SA
- Reports of or suspected criminal harm will be reported promptly to SA Police and to the Child Abuse Report Line (Department for Child Protection)
- A supportive environment will be established for people affected by or reporting harm
- Incidents will be promptly and thoroughly investigated, but not so as to interfere with SA Police or the Department for Child Protection investigations
- Adult Members will be supported to develop understanding and skills to keep themselves and others safe
- Action will be taken against any adult Member who fails to meet standards set
- All reports, investigations and action taken will be properly documented

This policy applies equally to all staff, volunteers, Members of the Order, students, contractors and visitors engaging in any St John SA related activity.

All members acknowledge their role and responsibility regarding child and young person safety via a Contract of Employment (paid member) or Volunteer Agreement (volunteer member).

## 2. Policy Statement

St John SA values and respects children and young people. Their safety and protection is always a first priority. St John SA is committed to diversity and inclusion and bullying and harassment will not be tolerated.

Breaches of this policy and associated documents will result in disciplinary action and/or criminal charges, including possible suspension of membership or termination of employment /membership.

As an organisation working with and supplying services to children and young people, St John SA will:

- Create and maintain a culture with a focus on the protection and safety of children and young people under our care
- Promote a safe and supportive environment for all children and young people participating in St John SA activities
- Recognise children and young people as individuals who have the right to be treated with dignity and respect, free from emotional and physical danger, harm or risk of harm
- Be committed to taking all reasonable steps to protect the safety and well-being of children and young people
- Encourage and respect the views of children and young people who access St John SA

- Listen to and act upon any concerns that children and young people or their families raise with St John SA
- Ensure children and young people and their families know their rights and how to access the complaints procedure available to them, as well as their Child Safety responsibilities
- Make all adult Members aware of their safeguarding responsibilities in regards to children and young people
- Proactively cooperate with governmental child protection agencies, particularly in the reporting of suspected cases of harm or risk of harm.

This policy is available to all Members on the St John SA intranet site and by request through the office of the Chief Executive Officer, the Manager, People Performance and Culture or the Child Safety Officers of St John SA. This policy and the Safeguarding Children & Vulnerable People Handbook is accessible on the St John SA website.

### 3. Legislative Requirements

This policy complies with St John SA's obligations regarding screening checks and legal duty of care as mandated notifiers as per the:

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

### 4. Child Safety Officers

The St John SA appointed Child Safety Officers are able to provide general information and advice on child safety issues. Child Safety Officers are:

- Executive Director, Operations and Community Services
- State Chaplain
- Director of Ceremonies
- State Cadet & Youth Officer

### 5. Protection from Liability

The *Children and Young People (Safety) Act 2017* protects a person who notifies the Department for Child Protection of a suspicion of child harm or risk of harm provided they have acted in good faith.

All St John SA members have the ability to make an allegation of wrongdoing without fear of retribution under the Whistleblower Policy. However, St John SA has no power to offer any person immunity against prosecution from either the SA Police or other regulatory agency, nor does St John SA have authority to reduce the penalty applicable if the conduct disclosed is criminal or in breach of clinical guidelines.

### 6. Disciplinary Action

Breaches of this policy may be considered a breach of the Code of Conduct, which may result in disciplinary action, including possible dismissal or termination of agreement. Breaches may also lead to criminal proceedings.

### 7. Empowering Children and Young People

The ideas and opinions of children and young people and key stakeholders (eg leaders, parents or guardians) will be sought in the development and/or review of child safety policy materials, organisational strategy and change.

Although we will not sway from our guiding principles and zero tolerance policy, we will use the best available evidence and feedback to improve how we deliver and maintain our safe practices. In the development and ongoing commitment to safe practices, we are committed to embedding consultation and feedback opportunities for our stakeholders. There are currently forums and feedback mechanisms so that children can have a voice on their care and the safety of their environments. These include:

- The Australian Youth Advisory Network
- Operations Branch Youth Engagement and Development Team

## **8. Safety Awareness for Children and Young People**

It is an important part of any child safe environment that children and young people should be empowered and made aware of the organisation's child safe practices and their role. St John SA has a responsibility to teach protective behaviours to children through a range of resources developed for this purpose.

## **9. St John SA Board Responsibility**

The St John SA Board is responsible to ensure that appropriate processes and procedures are in place to effectively manage organisational children and young people safety requirements.

Each member of the St John SA Board and Committees will be required to undertake the online Child Safety Awareness Training Course (excluding workbook which is needed only when accreditation is required).

## **10. Child and Young Person Related Employment Screening and Selection Practices**

St John SA will take all reasonable steps to ensure that it engages the most suitable and appropriate candidates to work with children and young people. St John SA will employ appropriate measures and apply best practice standards in the screening, recruitment and employment of Members to comply with the *Child Safety (Prohibited Persons) Act 2016*.

All St John SA staff and volunteers, including youth members aged 14 years and older, are required to obtain a current Working with Children Check prior to undertaking activities within or on behalf of the organisation.

## **11. Preventative Supervisory Practices**

All St John SA adult Members must take all reasonable measures to avoid potentially risky situations or opportunities for allegations or misunderstandings to occur. Such situations can, for example, occur in training or in the administration of first aid, working in the St John SA Youth Program or attending a division where children under the age of 18 years are present.

A detailed list of practices which should be avoided, and those which should be adopted, are outlined in the Children and Young People Safety Procedure.

## **12. Reporting and Responding to Suspected Child or Young Person Harm or Risk of Harm**

St John SA adult Members will respond to all reports made regarding allegations, disclosures or suspicions of child or young person harm. Reports of suspected inappropriate child or young person related behaviour, child or young person harm are to be made to the Department for Child Protection, Child Abuse Report Line (CARL) via phone on **13 14 78**. If a member is unsure whether there are reasonable

grounds to make a report, they should consult with a CARL officer or a Child Safety Officer (childsafetyofficer@stjohnsa.com.au).

### 13. Education and Training

St John SA is committed to training and educating all members on the protection of children and young people. All adult members of St John SA are required to complete Child Safety Awareness training. The type of training will be dependent on the roles and responsibilities of the position. See the Children and Young People Safety Procedure for specific requirements.

### 14. Risk Management

St John SA is committed to maintaining risk management processes which better equip the organisation to detect and prevent potential child or young person safety risks before they arise. St John SA expects all adult Members to prioritise the assessment and mitigation of risks, and will ensure that they have access to training and support which enables them to do this effectively.

St John SA recognises that we have a duty of care to prevent harm before it occurs, and will do its utmost to assess and mitigate the risks in relation to child and young people safety for all activities and programs.

St John SA are further committed to reviewing any serious incidents or breaches of policy to ensure that we are focused on strengthening child and young person safety within our organisation.

The table below summarises St John SA’s risk management strategy:

Identified risk	Actions to minimise risk
Culture of organisation is not child-safe focussed	<ul style="list-style-type: none"> <li>• child focused Code of Conduct is in place that sets the behavioural standards expected including what happens when a breach occurs</li> <li>• culture of management reflects our strong commitment to the safety of children and young people</li> <li>• the National Principles for Child Safe Organisations are embedded in policies and procedures</li> <li>• we meet the requirements of the <i>Children and Young People (Safety) Act 2017</i> (which mandates child safe environments) and the <i>Child Safety (Prohibited Persons) Act 2016</i> (which mandates Working with Children Checks)</li> </ul>
Organisational staff (including employees, volunteers, students, contractors etc) harm children/young people	<ul style="list-style-type: none"> <li>• recruitment processes including undertaking referee checks to ensure the suitability of persons before they are employed/volunteer with our organisation</li> <li>• interview questions (no prior preparation) should gauge an applicant’s understanding of child safe principles and actions that would be taken to prevent harm to children and young people</li> <li>• all organisational staff have WWCC with ‘not prohibited’ result prior to working with children and young people</li> </ul>

	<ul style="list-style-type: none"> <li>• WWCCs updated every 5 years and status remains as not prohibited</li> <li>• children and young people and their families are given a copy of our Child Safe Environments policy and complaints and feedback process as part of a welcome/induction pack</li> </ul>
Organisational staff (including employees, volunteers, students, contractors etc) do not understand their obligations to report harm and risk of harm to the Child Abuse Report Line (or SA Police if child/young person is at immediate risk)	<ul style="list-style-type: none"> <li>• all organisational staff trained in Safe Environments – Through their Eyes on commencement and refresher training every 3 years after</li> <li>• all organisational staff trained in Responding to Risk of Harm and Neglect – Education and Care on commencement and refresher training every 3 years after</li> <li>• all organisational staff must abide by the child safe environments policy and Code of Conduct (latter is signed on commencement with organisation)</li> </ul>
Physical contact	<ul style="list-style-type: none"> <li>• any physical contact must be appropriate to the delivery of services being provided</li> <li>• where physical contact is required, this is undertaken in a safe way by explaining why contact is required and what will happen, and asking the child/young person for their permission (or their family if this is more appropriate) before proceeding</li> <li>• unnecessary physical contact is not allowed</li> </ul>
Online communications	<ul style="list-style-type: none"> <li>• cyber safety and social media guidelines are in place and provided to all organisational staff</li> <li>• appropriate supervision is provided for all online activities</li> <li>• organisational staff must not communicate with children or young people via social media</li> </ul>
Transport of children and young people	<ul style="list-style-type: none"> <li>• organisational staff must not transport a child or young person unless specifically approved</li> <li>• parents/guardians must provide consent before transporting a child or young person</li> <li>• the organisational staff member must have a valid, unrestricted driver's licence</li> <li>• the vehicle must be registered, insured and in roadworthy condition</li> <li>• an organisational staff member must not be alone in a vehicle with a child or young person</li> </ul>

Supervision	<ul style="list-style-type: none"> <li>• children and young people are to be supervised by parents/guardians at all times</li> <li>• if child/young person not collected by parent/guardian at end of class/training, two adults are to stay with child/young person until they are collected</li> <li>• when providing one to one consultation with a child or young person, it will be in line of sight of another adult</li> </ul>
Taking images of children and young people	<ul style="list-style-type: none"> <li>• consent of child young person and their parent/guardian required</li> <li>• disclosure will be made as to how the image is to be used and consent must be provided by the child, young person and parent/guardian</li> <li>• images must be presented in a way that de-identifies the child or young person</li> </ul>
Physical environment	<ul style="list-style-type: none"> <li>• maintain a risk register that is reviewed annually to ensure effectiveness</li> <li>• conduct risk assessments for all activities</li> <li>• ensure all equipment is in good working order</li> </ul>
Privacy and confidentiality	<ul style="list-style-type: none"> <li>• all documents containing confidential information will be stored privately in a locked filing cabinet (or similar place with restricted access)</li> <li>• digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties</li> <li>• organisational staff must not disclose information regarding any child or young person without written consent of the child, young person and their parent/guardian</li> </ul>
Overnight and/or off-site activities	<ul style="list-style-type: none"> <li>• consent of parent or guardian must be given</li> <li>• children and young people must be supervised by a minimum of 2 adults of the same gender as the children attending</li> <li>• privacy when children or young people are bathing, toileting and dressing must be provided</li> <li>• children and young people will not be left under the supervision of unauthorised persons</li> <li>• sleeping arrangements will not compromise the safety of children or young people such as unsupervised sleeping arrangements, or children or young people sharing a bed or an adult sleeping in the same bed as a child or young person</li> </ul>

	<ul style="list-style-type: none"> <li>• in the event of billeting arrangements, host adults should have a child or young person attending the same event from the same household, and have a not prohibited WWCC</li> <li>• children and young people have the right to contact their parents, or another adult, if they feel unsafe, uncomfortable, or distressed during the stay</li> </ul>
Change room requirements	<ul style="list-style-type: none"> <li>• a minimum of two adults of the same gender as the children or young people must be present</li> <li>• supervision will be provided ensuring the child or young person's right to privacy</li> <li>• adults must not shower or change whilst supervising children or young people</li> <li>• phones, cameras and recording devices must not be used in change room</li> </ul>

## 15. Member Response to Harmful Behaviour

Where a child or young person is behaving in a harmful (or potentially harmful) way towards another Member(s) or members of the public at the division or at an event, St John SA Members have a duty of care towards the public and the child or young person. St John SA Members will ensure the safety of all involved, including themselves and any child/ren or young person/people. This might involve removing themselves from the situation where practicable or calling **Triple Zero 000** for assistance.

## 16. Transition of Youth Members to Adult Membership

Youth Members transitioning to Adult Membership must follow the requirements of Transfer of Youth Members to Adult Membership Policy and Procedure.

## 17. Reporting Historic Claims of Abuse

In all circumstances where historical harm allegations are made which pertain to St John SA, the organisation will co-operate fully with SA Police investigations. Any allegation of historical harm which pertains to St John SA should be notified to the CEO ([ceo.office@stjohnsa.com.au](mailto:ceo.office@stjohnsa.com.au)) or their delegate within 24 hours of receipt.

## 18. Obtaining Consent

When working with children or young people, it is important that valid consent is always obtained for participation in St John SA activities, programs and services. Consent might be, for example, from parents/carers for a child or young person to take part in a specified St John SA activity, or consent given expressly from a child or young person or parents/carers for an adult Member to provide first aid treatment. Consent may also be signalled by a person's conduct, for example, where a person turns up to participate in an event voluntarily or a child or young person tells a leader it is ok to demonstrate a first aid practice on their person in a lesson.

Where an adult Member is concerned that consent given is not valid, it is important to seek the advice of a supervisor or a Child Safety Officer.

## 19. Documentation Retention and Record Keeping

All incidents relating to child safety concerns, allegations and disclosures must be reported and recorded on the Child Safety Incident Reporting form. All child safety incident reporting forms, complaints and grievances will be securely and confidentially stored by St John SA for up to 100 years

## 20. Support

St John SA will provide support to children, young people and families through appropriate counselling services, referral to professional support agencies, legal representation, particularly after a notification about harmful behaviour has been made.

## 21. Review Date

This Policy will be reviewed at least annually or earlier as required by Section 115 of the *Children and Young People (Safety) Act 2017*, or if new or additional risks are identified. If the policy is updated or modified we will re-lodge a Child Safe Environments compliance statement.

## 22. Additional Information

Additional information regarding Child safety can be accessed via the Department for Child Protection website at <http://www.childprotection.sa.gov.au>.

## 23. Related Documents

Child Safety Incident Reporting Form  
Children & Young People Safety Procedure  
Children and Vulnerable Persons Member Handbook

## 24. Definition(s)

Adult Member: Any person over the age of 18 (paid or voluntary) who conducts business for or on behalf of St John SA.

Youth Member: A Youth Member, for the purpose of this document, is defined as any person from 16 up to 18 years of age.

Youth Program: Any program run for the education and development for young people under the banner of St John Ambulance SA.

Child or Young Person: A child or young person is all people under the age of 18.

Complainant: A person who makes a claim

Harm: Physical harm or psychological harm (whether caused by an act or omission) and, 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.

s17 Children and Young People (Safety) Act 2017

National Police Check: A National Police clearance which satisfies the requirement to work with all vulnerable people (apart from children or young people).

Working with Children Check: An assessment of whether someone poses an unacceptable risk when working with children and young people. It includes a review of criminal history, child protection matters and misconduct reports

A full list of definitions is listed in the Children & Young People Safety Procedure.