

## Child Safe

### Foundation Documents

| Applies to                               | Policy responsibility | Last reviewed and version No. | Next review date |
|--|-----------------------|-------------------------------|------------------|
| All staff, carers, students & volunteers | Client Services       | Dec 2013                      | Dec 2016         |

#### Policy context (this policy relates to)

|   |  |
|---|--|
| <b>Standards or other external requirements</b> | Quality Improvement Council (QIC) Health and Community Services Standards <ul style="list-style-type: none"> <li>• 2.3 Ensuring cultural safety and appropriateness</li> <li>• 2.4 Confirming consumer rights</li> </ul><br>Department of Human Services (DHS) Standards 2011: <ul style="list-style-type: none"> <li>• 1 - Empowerment</li> <li>• 3 – Wellbeing</li> </ul>  |
| <b>Legislation or other requirements</b>        | <ul style="list-style-type: none"> <li>• <i>Charter of Human Rights &amp; Responsibilities Act 2006</i> (VIC)</li> <li>• <i>Child Wellbeing and Safety Act 2005</i> (VIC)</li> <li>• <i>Children, Youth &amp; Families Act 2005</i> (VIC)</li> <li>• <i>Family Violence Protection Act 2008</i> (VIC)</li> <li>• <i>Working with Children Act 2005</i> (VIC)</li> <li>• <i>Information Privacy Act 2000</i> (VIC)</li> </ul> |
| <b>Contractual obligations</b>                  | <ul style="list-style-type: none"> <li>• DHS Policy &amp; Funding Plan 2012-15</li> <li>• DHS Program Requirements</li> <li>• Critical Client Incident Management Instruction (2011)</li> <li>• Responding to Allegations of Physical or Sexual Assault (2005)</li> <li>• Guidelines for Responding to Quality of Care Concerns in out-of-home-care (2009)</li> </ul>  |

## Policy

VACCA believes that all children have a right to feel and be safe and to live in an environment that is free from abuse, neglect and violence.

We are committed to promoting and upholding the right of Aboriginal children to maintain and celebrate their identity and culture, recognising that connection to culture is critical for children's emotional, physical and spiritual wellbeing.



Working in partnership with government, the non-government sector, families and the community, we have a collective responsibility to act in the best interests of children to make sure they are kept safe from harm – physically, emotionally and culturally.

Through our services, we aim to ensure the best possible care and support for vulnerable and at-risk Aboriginal children, individuals and families in the community. In doing so, we place the safety of our children above all else.

As an Aboriginal organisation, we take our duty of care towards children and young people very seriously, and we will take action on behalf of children to ensure they are protected.

Fundamental to this, is ensuring that our staff, carers and volunteers have a shared understanding of child safety and their responsibilities in keeping our children protected from abuse, neglect and violence – at home, in the community and within the statutory out-of-home care system.

The key objectives of the *Child Safe* policy are to:

- Set out clear expectations of staff, carers and volunteers as to what is required to keep our children safe, including knowing how to identify when a child is unsafe and being able to respond appropriately.
- Ensure our practice is focussed on preventing child abuse and neglect, intervening earlier with vulnerable children, and providing an integrated, comprehensive service response where abuse or neglect has occurred.
- Provide services in a culturally safe environment, free from abuse, neglect and violence, ensuring our work with children does not contribute to their experience of abuse and neglect.

Failure to comply with the policy may result in disciplinary action and, in more serious cases, may result in termination of employment.

## Background

The *Child Safe* policy is guided by a number of key legislative requirements and overarching frameworks and is in line with relevant national and state-wide plans designed to support and protect children.

Common to these foundational documents are child safe principles that aim to:

- Make the best interests of the child a primary consideration in all actions and decisions concerning children.
- View the child's best interest through the lens of culture.



- Protect children from all forms of physical abuse and injury, neglect or negligent treatment, emotional maltreatment or exploitation, cultural abuse, sexual abuse and family violence.
- Protect and promote the rights of Aboriginal children to enjoy their own culture and identity without fear of retribution or discrimination.
- Empower and strengthen the capacity of parents, families and communities to provide safe care of children.

## Key Terms and Concepts

### Duty of care

In the context of this policy, duty of care is a responsibility to act in a manner that does not cause any harm or loss to a child. This can include harm or loss caused by a person's actions as well as their inactions, for example, harm caused by a delay in decision making or service response.

The standard of care expected of our staff, carers and volunteers measured by what a reasonable person would do in similar circumstances, and will vary according to how reliant a child is on our care. The more reliant the child is, the higher the standard of care expected.

### Child safety

For an Aboriginal child, being safe means:

- Not being abused or hurt.
- Living in a home that is safe and not dangerous.
- Feeling safe.
- Having workers, and where relevant carers, that:
  - Understand, respect and value their Aboriginal culture
  - Help them feel good about their Aboriginal culture
  - Help them stay connected to their culture in all parts of their life.

### Child abuse and neglect

The following are all recognised forms of child abuse and neglect that can compromise a child's safety:

#### Physical abuse

Physical abuse occurs when a non-accidental form of injury or serious physical harm is inflicted on a child. Physical abuse can include beating, shaking, burning and assault with weapons. The injury may take the form of bruises, cuts, burns or fractures.



Physical injury or serious physical harm to a child may also result from excessive or inappropriate discipline, aggressive treatment of a child, or in the context of family violence.

Lack of appropriate supervision or failure to adequately ensure a child's safety by a parent or caregiver can expose the child to extremely dangerous or life threatening situations, which result in physical injury and significant harm to the child.

When a parent or caregiver is unwilling or unable to protect a child from physical abuse, it becomes a protective concern.

### Emotional maltreatment

Emotional abuse occurs when a child is repeatedly rejected, isolated, frightened or threatened, to the extent that it significantly damages the child's physical, social, intellectual or emotional development. This may involve hostility, derogatory name calling, put downs or persistent coldness.

When a parent or caregiver is unwilling or unable to protect a child from emotional abuse, it becomes a protective concern.

### Sexual abuse

Sexual abuse occurs when a person uses their power over the child to involve that child in sexual activity.

Child sexual abuse can include fondling genitals, masturbation, vaginal or anal penetration by a finger, penis or any other object, voyeurism and exhibitionism. It can also include exposure to or exploitation through pornography or prostitution.

Sexual activity between a child and older person is inappropriate because children are never in a position to give informed consent to such activities.

When a parent or caregiver is unwilling or unable to protect a child from sexual abuse, it becomes a protective concern.

### Neglect

Neglect occurs when a parent or caregiver fails to provide the child with an adequate standard of nutrition, hygiene, medical care, clothing, shelter or supervision, to the extent that the child's safety, health and development is, or is likely to be, significantly harmed.

A child is neglected if they are abandoned, consistently left unattended or uncared for over unreasonable periods of time that is inconsistent with their age and developmental stage, or if they are placed in the care of strangers who may harm the child.



A child is neglected if their home environment is hazardous and poses a threat to their immediate safety or development.

A child is neglected if they have a serious medical condition for which the parent has consistently failed to obtain treatment or dispense prescribed medication.

When a parent or caregiver is unwilling or unable to protect a child from neglect, it becomes a protective concern.

### Cultural abuse

Cultural abuse occurs when a person's culture is ignored, denigrated or worse, intentionally attacked. Cultural abuse can be overt, such as in the case of racial vilification or discrimination, or covert, such as in the case of a lack of cultural sensitivity or an absence of positive images about another culture.

Denying a child their cultural identity is a form of abuse.

Children have a right to live in communities that are safe and free from violence, racism and discrimination, including having their cultural identity maintained.

### Family violence

Family violence is any behaviour by a person that controls or dominates a family member and causes them to fear for their own or another person's safety or wellbeing.

Family violence can occur in all kinds of families, and in family relationships extending beyond intimate partners, parents, siblings, and blood relatives.

Family violence extends beyond physical and sexual violence and often involves emotional or psychological abuse, cultural or spiritual abuse and economic abuse.

Importantly family violence includes behaviours by a person that causes a child to hear or witness, or otherwise be exposed to the effects of family violence.

Children do not have to be physically present when the violence occurs to suffer the negative consequences associated with exposure.

## **Staff Responsibilities and Procedures**

The *Child Safe* policy provides the foundation for all we do in working with and caring for children. It applies across all parts of the organisation including governance, corporate, strategic development and direct client services.



Responsibilities for ensuring child safety are reflected at all levels of the organisation.

## Responsibilities

### Board and senior management

- Demonstrate leadership in child safe practices
- Ensure that the *Child Safe* policy is in place and reviewed regularly

### Direct line managers

- Ensure staff, carers, volunteers and students are familiar with the *Child Safe* policy and procedure
- Provide support to staff, carers, volunteers and students to take reasonable steps to keep children safe.

### All staff and carers

- Understand the nature of child abuse and neglect and its immediate and long term impacts.
- Be familiar with the *Child Safe* policy and know how to:
  - Identify children who are vulnerable and at-risk of child abuse and neglect.
  - Work together and share information appropriately to promote children's safety and wellbeing.
  - Where necessary, take action on behalf of children to respond to and report suspected child abuse or neglect.
- Follow the procedures associated with the policy, as applicable to their role
- Work with and care for children in a manner that does not cause them further harm.

## Procedures

The following sections set out VACCA's expectations of all staff, carers, volunteers and students in playing their part to keep children safe.

These procedures are in line with VACCA's legal and regulatory obligations and guided by frameworks that protect the rights of children.

1. Staff and carer competency, recruitment and pre-employment
  - (i) Working with children check

Under the Working with Children Act 2005, VACCA has a legal obligation to protect children from sexual or physical harm by ensuring that people who work with, or care for, them have their suitability checked by an authorised body.



*The following procedure is relevant to all staff and carers.*

Any person with responsibility for recruiting staff or carers at VACCA must ensure that procedures for working with children checks are complied with.

(ii) Recruitment, screening and selection

As part of VACCA's commitment to maintaining a child safe organisation, it has established rigorous recruitment, selection and screening processes for all staff and carers.

*The following procedures are relevant to all staff.*

As a minimum, the recruitment process must include:

- Assessment of applicant's competencies (including cultural competency), skills and personal attributes
- Evidence of identity and qualifications
- Working with children check
- Criminal record check
- Direct contact with two referees, including the applicant's current or most recent employer.

Any person with responsibility for recruiting staff at VACCA must ensure that VACCA's recruitment and selection policy is complied with and that a copy of the Child Safe policy is provided to all successful applicants.

*The following procedures are relevant to all carers, including residential carers. Residential carers are staff employed by or contracted by VACCA who provide direct care to children.*

Before approving, employing or engaging carers, VACCA is legally required to assess their capacity to provide appropriate care.

As a minimum, the carer approval process must include:

- Evidence of identity and qualifications
- Carer register check
- Working with children check
- Criminal record check
- Assessment of carer competencies (including cultural competency), skills and personal attributes, using the approved tools
- Direct contact with three referees



- Pre-existing injury and/or health check
- Registration with the carer register
- Home environment inspection (for home based carers)

Any person with responsibility for recruiting carers at VACCA must ensure that procedures for approving and engaging carers outlined in the DHS program requirements for residential and home-based care are complied with and that a copy of the Child Safe policy is provided to all successful applicants.

## 2. Staff and carer training, development, support and supervision

It is a condition of employment and/or engagement with VACCA that all staff and carers are provided with training, professional development, supervision and support to perform their duties, including the need understand their roles and responsibilities in keeping children safe.

VACCA expects that all staff and carers have a clear understanding about abuse and neglect, and the harmful effects it has on our children, families and community.

VACCA expects that all staff have a clear understanding about the importance of culture in promoting the safety, wellbeing and development of Aboriginal children.

*The following procedures are **relevant to all staff and carers***

Any person with responsibility for orientation and induction of new staff and/or carers must ensure that all staff and carers are made aware of the *Child Safe* policy upon their commencement and as part of their introduction to the organisation.

All staff and carers have a responsibility to identify their individual professional development needs with their line manager or support worker to ensure they are well informed about child safety.

*The following procedures are **relevant to all staff***

Any person with responsibility for managing programs must ensure that program procedures and processes are compliant with the *Child Safe* policy.

Any person with supervision responsibilities must ensure that staff understand the *Child Safe* policy, that they are supported to implement the policy and that their compliance with the policy is regularly assessed.



Any person with responsibility for training and professional development of existing staff must ensure that staff continue to receive up to date, relevant information regarding child safe practices and care.

All non-Aboriginal staff are expected to undertake relevant training and to actively seek advice and ongoing professional education to grow their cultural competence and understanding of the impact of cultural abuse on a child's safety, development and wellbeing.

*The following procedures are **relevant to all carers***

Any person with carer support responsibilities must ensure that carers have timely access to adequate support, training and information in order to meet the individual safety needs of children in their care.

In circumstances where an Aboriginal child is placed with a non-Aboriginal carer, the carer's support worker must ensure the carer receives information and training on culturally appropriate caring to ensure the child's cultural safety.

Any person with carer support responsibilities must ensure that carers are supported to take action when a child's safety is compromised.

### 3. Working together to keep children safe

One of the key themes that continues to be highlighted during the reviews of child deaths and critical client incidents of children known to child protection is the need for clear communication and collaboration, including information sharing and effective partnerships with families and other professionals, to keep children safe.

VACCA expects all staff to appropriately share relevant information about the child's safety and development with other people involved in the child's care and case plan.

At the same time, VACCA expects that staff treat the personal information of our clients with care and respect at all times.

We acknowledge that there may be instances where staff will need to share information about a child or family they are working with or caring for, even though that person has not given consent.



*The following procedure **applies to all staff***

In working with Aboriginal children and their families, staff and carers are expected to comply with VACCA's privacy and confidentiality policy at all times when sharing client information.

#### 4. Providing child safe services

##### (i) Providing a culturally safe service

For Aboriginal children cultural safety and the prevention of cultural abuse is a critical issue. Strong cultural identity is fundamental to the safety and well-being of Aboriginal children and has lifetime impacts on a child's learning, health and development.

VACCA is committed to strengthening the cultural connectedness of Aboriginal children and young people with their community, fostering pride in their identity and facilitating cultural program and activities.

Providing a culturally sensitive and respectful service includes:

- Encouraging and facilitating the child's contact with their Aboriginal family, extended family, community and land.
- Providing the child with opportunities to participate in the Aboriginal community and to meet Elders and Aboriginal people from the local Aboriginal community through various cultural events.
- Where appropriate, providing information to the child about their cultural background.
- Engaging the child and their families in cultural activities such as Aboriginal artwork, sport, music, community events and cultural camps.
- Promoting positive Aboriginal role models.

*The following procedures apply to **all staff***

In working with Aboriginal children and their families, staff are expected to provide a culturally sensitive and respectful service that acknowledges, respects, promotes and strengthens the child's culture.

##### (ii) Taking action when an Aboriginal child is culturally unsafe

VACCA expects all staff and carers to take action when an Aboriginal child is considered to be at risk of cultural abuse or where a child is living in an environment where their cultural safety is compromised.



*The following procedures apply to **all staff and carers***

In working with Aboriginal children and their families or caring for Aboriginal children, staff and carers are expected to take appropriate action where an Aboriginal child is being culturally abused by a parent, carer or professional involved in their care.

(iii) Preventing child abuse and neglect and intervening earlier

Prevention programs aim to stop abuse or neglect from occurring in the first place. Increasing our families' participation in universal services such as maternal and child health, kindergarten and schools, can have an overall impact on reducing the risk of child abuse and neglect.

Earlier intervention programs aim to support children identified as vulnerable and can be an effective method for reducing the risk of child abuse and neglect. Specialist adult services with child and family sensitive practices can also help to address the needs of vulnerable children and their families.

VACCA delivers a number of prevention and early intervention programs and has formed key partnerships with other child and family services to ensure they are culturally appropriate.

Staff are expected to refer children and families to Aboriginal services in the first instance, as these are considered to provide the safest care.

*The following procedure applies to **all staff***

In working with Aboriginal children and their families, staff are expected to actively engage and sustain the participation of children and families with universal services, and to make appropriate referrals for children and their families to early intervention services and specialist adult services.

## 5. Providing child safe care

Children who have entered out of home care have experienced significant levels of trauma as a result of abuse and neglect within their families. It is our responsibility to make sure we don't contribute to any further harm through our actions or inactions.

Children and young people in care should expect to be provided with a safe environment and receive proper and appropriate care and supervision. Every reasonable precaution is to be taken to protect children from potential hazards that are likely to cause harm.

Staff in out-of-home care programs are to ensure one on one time with children so there are opportunities for children to raise and discuss any issues or concerns about their care.



Under the *Children, Youth and Families Act 2005*, it is an offence for any person with a duty of care to a child to fail to protect that child from harm. It is also an offence to for a person who has charge of a child to leave that child unattended without making reasonable provisions for the child's supervision and care.

(i) Providing culturally safe care

Providing a culturally safe home includes:

- Displaying Aboriginal artwork, posters, books, a flag or artefacts to assist the child to connect to their cultural heritage and learn about Aboriginal history.
- Follow Aboriginal child rearing practices and cultural lore such as men discussing men's business with boys and women discussing women's business with girls.
- Taking the child to cultural activities and events in the community.
- Creating and facilitating opportunities for children to socialise and form significant relationships with other Aboriginal people.

*The following procedure applies to **all carers** (including residential care staff)*

In providing care for Aboriginal children, carers (including residential carers) are expected to provide a culturally safe home where the child can be proud of their cultural heritage and identity and where they know how to make community connections.

(ii) Responding to critical client incidents

Critical incidents involving children in care may involve:

- Unsafe behaviours such as absconding, drug or alcohol abuse, self-harm, violent or criminal behaviour, sexual exploitation or problem sexual behaviour.
- Allegations of physical or sexual assault of a child in care.
- Quality of care concerns about a child in care by their carer.

*The following procedures apply to **all staff***

In working with Aboriginal children, staff are expected to handle critical client incidents in line with:

- [DHS critical client incident management instruction 2011](#)
- VACCA Incident Reporting policy
- [DHS responding to allegations of physical and sexual assault departmental instructions 2005](#)
- [DHS guidelines for responding to quality of care concerns in out-of-home care](#)

The best interests of the child will be paramount in all critical client incident responses. Significant weight will be placed on maintaining the child's connection to their culture and



community, particularly where the outcome involves a placement outside the Aboriginal community.

(iii) Responding to non-critical client events

Non-critical events are issues that have no significant implications for DHS and which can be managed as part of VACCA's existing care planning and/or service management.

While non-critical events do not need to be reported to DHS, they still need to be recorded and captured at a local level to support and improve service delivery.

VACCA may continue to have a legal responsibility, or duty of care, to report the incident through other reporting mechanisms and/or to take formal action, for example to notify police of an alleged criminal act, to notify Worksafe of an occupational hazard or to review a child's care plan.

Non-critical client events may provide an early warning that child's care plan needs to be reviewed, or that care arrangements or service delivery needs to be improved.

VACCA will use its internal processes to address non critical events.

*The following procedure applies to **all staff***

In working with Aboriginal children, staff are expected to handle non-critical events in line with the VACCA incident reporting policy.

The program manager or senior manager will determine whether the matter meets the criteria for a critical client incident.

6. Responding to and reporting child abuse and neglect

VACCA expects that any staff or carer who knows or believes a child is being hurt by someone in their family or is living in a home that is unsafe will act on behalf of that child to protect them, regardless of whether this happens in course of their work or in Community.

A staff member might identify a concern while at work, for example in direct client services, community events, caregiver assessments or in response to a code of conduct or quality of care concern. A concern might also be identified outside of the workplace, through a staff member or carers' relationships with friends, family, neighbours, schools or community or through a volunteer role.

Taking action to protect a child may involve direct assistance to the child and family, a referral for the child and family to an appropriate service, or in some instances, it may require a report to child protection.



Some professionals, such as doctors, nurses, midwives, teachers, principals and police, have a legal obligation to report suspected cases of child abuse to child protection.

**While VACCA staff and carers are not classified as mandated reporters under the Children, Youth and Families Act 2005, it is VACCA's position that they have a professional duty of care and moral obligation to do so. Failure to act on suspected cases of child abuse is not in the child's best interests, and constitutes a breach of duty of care and of this policy.**

Suspected cases of child abuse might include:

- Serious physical abuse of, or non-accidental or unexplained injury to, a child.
- A disclosure of sexual abuse by a child or witness, or a combination of factors suggesting the likelihood of sexual abuse – the child showing concerning behaviours, for example, after the child's mother takes on a new partner, or where a known or suspected perpetrator has had unsupervised contact with the child.
- Serious emotional abuse and ill treatment of a child impacting on the child's development.
- Persistent neglect, poor care or lack of appropriate supervision, where there is a likelihood of significant harm to the child or the child's development.
- Serious or persistent family violence or parental substance misuse, mental illness or intellectual disability – where there is a likelihood of significant harm to the child or the child's development.
- Where a child's actions or behaviour may place them at risk of significant harm and the parents are unwilling or unable to protect the child.
- Where a child appears to have been abandoned, or where the child's parents are dead or incapacitated, and no other person is caring properly for the child.

When making a report to child protection, it should be remembered that:

- **Ultimately it is personal responsibility of the person who suspects the abuse to make the report. Consulting with a line manager or caseworker, in and of itself, does not constitute a report nor does it discharge the staff member or carer of their moral obligation to make a report.**
- Staff and carers can make a report confidentially, if needed, and their identity will be protected.
- Staff and carers do not have to prove that the abuse has occurred to make a report.
- Staff and carers do not need to inform the family or seek their consent to make a report, however it is best practice to raise their concerns with the family before making a report, where this is possible and where this does not place the child at greater risk of harm, or place themselves or another person at risk of harm.
- Staff and carers do not require VACCA's permission to make a report.



- It is not the role of staff or carers to investigate the protective concerns or to interview the child about the concerns.
- When staff or carers share information with child protection under these circumstances, they cannot be held legally or professionally liable for misconduct, regardless of the outcome of the report.
- A report to child protection can include both an initial report (where there is no current child protection involvement) as well as subsequent reports where any new information is identified that change the level of risk.
- Any new information is identified that change the level of risk.

## Procedures

The following procedures apply to all staff and carers

In identifying a concern for the safety of a child, it is expected that:

- Where appropriate, staff and carers will consult with their line manager or caseworker about their concerns, and together develop an appropriate course of action.
- Where possible and safe to do so, staff and carers will try to raise their concerns with the family directly.
- Depending on the nature of their relationship with the family, staff and carers may offer direct assistance to the family, for example respite care.
- Where direct assistance is not possible or appropriate, staff and carers may assist the family to make a referral to an appropriate support service, or to make that referral on behalf of the family.
- Where a staff member or carer believes on reasonable grounds that a child has been, or is at significant risk of, harm as a result of **physical, sexual or emotional abuse or neglect within the family**, and that their parent or caregiver is unable or unwilling to protect the child from harm, they must make a report to child protection. **This requirement extends beyond the workplace to include protective concerns held for a child outside of the staff member or carer's usual role.**
- The line manager or caseworker will assist staff and carers to make a report to child protection and will provide (or make available) debriefing, where requested. If necessary, the line manager or caseworker may seek advice from the Lakidjeka ACSASS program.
- Where required, action must be taken in line with the critical client incident, code of conduct or quality of care processes.
- If concerns raised directly involve a staff member or carer, **their privacy will be strictly upheld during the investigation process and information will not be disclosed to any person that is not directly related to the investigation.**



### Documentation related to this policy

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|--|--|
| <b>Related policies</b>  | <ul style="list-style-type: none"> <li>• Foundation documents <ul style="list-style-type: none"> <li>○ <a href="#">VACCA strategic plan 2012-15</a></li> <li>○ Best interests of the child</li> <li>○ Cultural strengthening</li> <li>○ Commitment to client service</li> <li>○ Aboriginal professionalism</li> <li>○ Aboriginal services first</li> </ul> </li> <li>• Governance <ul style="list-style-type: none"> <li>○ Roles, responsibilities and rights of staff</li> </ul> </li> <li>• Human resources <ul style="list-style-type: none"> <li>○ Code of conduct</li> <li>○ Recruitment and selection</li> <li>○ Credentialing – staff qualifications</li> <li>○ Orientation and induction</li> <li>○ Supervision</li> <li>○ Professional development and training</li> <li>○ Performance review and professional development program</li> <li>○ Non Aboriginal staff</li> <li>○ Students and volunteers</li> <li>○ Privacy and confidentiality</li> </ul> </li> <li>• Client services <ul style="list-style-type: none"> <li>○ Critical incidents</li> <li>○ Physical restraint</li> <li>○ Safe, positive physical contact</li> <li>○ Responding to children and young people with trauma related behaviours</li> <li>○ Responding to problem sexual behaviour</li> <li>○ Substance abuse by children and young people</li> <li>○ Cyber safety</li> </ul> </li> </ul> |
| <b>Forms, record keeping or other organisational documents</b> | <ul style="list-style-type: none"> <li>• DHS Incident Report Form</li> </ul>   |

### Reviewing and approving this policy

| Frequency     | Policy Sponsor  | Policy Committee Approval | CEO Approval |
|---------------|-----------------|---------------------------|--------------|
| Every 3 years | Client Services | TBC                       | 07.02.14     |