



Reporting on the implementation of recommendations by major institutions (Rec 17.3)

Major institutions and peak bodies of institutions that engage in child-related work should, beginning 12 months after this Final Report is tabled, report on their implementation of the Royal Commission's recommendations to the National Office for Child Safety through five consecutive annual reports. The National Office for Child Safety should make these reports publicly available. At a minimum, the institutions reporting should include those that were the subject of the Royal Commission's institutional review hearings held from 5 December 2016 to 10 March 2017

https://www.childabuseroyalcommission.gov.au/sites/default/files/final_report_-_recommendations.pdf

Section 1: Identifying the institutions:

Section 1 will ask institutions to record their:

- Interchange Shoalhaven Inc.
- 37 Holloway Road Nowra, NSW 2541
- Drew Sullivan - Leader, Operational Solutions
- Voluntary out of home care provider.

Section 2: General reporting against recommendations relevant to all institutions:

Theme 1: Making institutions child safe

Measure:

1. Child safety is embedded in institutional leadership, governance and culture
2. Children participate in decisions affecting them and are taken seriously
3. Families and communities are informed and involved
4. Equity is upheld and diverse needs are taken into account
5. People working with children are suitable and supported
6. Processes to respond to complaints of child sexual abuse are child focused
7. Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training
8. Physical and online environments minimise the opportunity for abuse to occur
9. Implementation of the Child Safe Standards is continuously reviewed and improved
10. Policies and procedures document how the institution is child safe.

Report Volume:



Volume 6

Recommendation(s) the measure is in response to:

Recommendation 6.6

Descriptions of the recommendations:

Institutions should be guided by the following core components when implementing the Child Safe Standards:

Standard 1: Child safety is embedded in institutional leadership, governance and culture.

- A. The institution publicly commits to child safety and leaders champion a child safe culture.
- B. Child safety is a shared responsibility at all levels of the institution.
- C. Risk management strategies focus on preventing, identifying and mitigating risks to children.
- D. Staff and volunteers comply with a code of conduct that sets clear behavioural standards towards children.
- E. Staff and volunteers understand their obligations on information sharing and recordkeeping.

Standard 2: Children participate in decisions affecting them and are taken seriously.

- A. Children are able to express their views and are provided opportunities to participate in decisions that affect their lives.
- B. The importance of friendships is recognised and support from peers is encouraged, helping children feel safe and be less isolated.
- C. Children can access sexual abuse prevention programs and information.
- D. Staff and volunteers are attuned to signs of harm and facilitate child-friendly ways for children to communicate and raise their concerns.

Standard 3: Families and communities are informed and involved

- A. Families have the primary responsibility for the upbringing and development of their child and participate in decisions affecting their child.
- B. The institution engages in open, two-way communication with families and communities about its child safety approach and relevant information is accessible.
- C. Families and communities have a say in the institution's policies and practices.
- D. Families and communities are informed about the institution's operations and governance.

Standard 4: Equity is upheld and diverse needs are taken into account

- A. The institution actively anticipates children's diverse circumstances and responds effectively to those with additional vulnerabilities.
- B. All children have access to information, support and complaints processes.



- C. The institution pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with disability, and children from culturally and linguistically diverse backgrounds.

Standard 5: People working with children are suitable and supported

- A. Recruitment, including advertising and screening, emphasises child safety.
- B. Relevant staff and volunteers have Working With Children Checks.
- C. All staff and volunteers receive an appropriate induction and are aware of their child safety responsibilities, including reporting obligations.
- D. Supervision and people management have a child safety focus.

Standard 6: Processes to respond to complaints of child sexual abuse are child focused

- A. The institution has a child-focused complaint handling system that is understood by children, staff, volunteers and families.
- B. The institution has an effective complaint handling policy and procedure which clearly outline roles and responsibilities, approaches to dealing with different types of complaints and obligations to act and report.
- C. Complaints are taken seriously, responded to promptly and thoroughly, and reporting, privacy and employment law obligations are met.

Standard 7: Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training

- A. Relevant staff and volunteers receive training on the nature and indicators of child maltreatment, particularly institutional child sexual abuse.
- B. Staff and volunteers receive training on the institution's child safe practices and child protection.
- C. Relevant staff and volunteers are supported to develop practical skills in protecting children and responding to disclosures.

Standard 8: Physical and online environments minimise the opportunity for abuse to occur

- A. Risks in the online and physical environments are identified and mitigated without compromising a child's right to privacy and healthy development.
- B. The online environment is used in accordance with the institution's code of conduct and relevant policies.

Standard 9: Implementation of the Child Safe Standards is continuously reviewed and improved

- A. The institution regularly reviews and improves child safe practices.
- B. The institution analyses complaints to identify causes and systemic failures to inform continuous improvement.

Standard 10: Policies and procedures document how the institution is child safe

- A. Policies and procedures address all Child Safe Standards.

- B. Policies and procedures are accessible and easy to understand.
- C. Best practice models and stakeholder consultation to inform the development of policies and procedures.
- D. Leaders champion and model compliance with policies and procedures.
- E. Staff understand and implement the policies and procedures.

Description of measures implemented prior to December 2019:

Standard 1:

- All Interchange Shoalhaven potential employees undergo online orientation/induction (through [iinduct](#)) as part of their recruitment process prior to them receiving an employment contract with the organisation.
 - The online orientation/induction contains a specific module relating to the organisation's Code of Conduct - refer to the screenshot "[Workplace Behaviours, Roles and Expectations](#)" listed in Section 4: Attachments.

Standard 2:

- Children are encouraged to speak up as per the Interchange Shoalhaven complaints procedure.
 - The Interchange Shoalhaven complaints procedure and feedback mechanisms are made available to all participants and families at the commencement of receiving services and is promoted regularly throughout communications.
 - [Protective Behaviour Strategies](#)

Standard 3:

- Interchange Shoalhaven has adopted a Consultation process that focuses on the inclusion of all its stakeholders in service delivery.
 - [Consultation](#)

Standard 4:

- As a provider of Disability support under the NDIS, Interchange Shoalhaven Equity is upheld and diverse needs are taken into account throughout all its services delivered
 - [Valued Status](#)

Standard 5:

- Any potential new employee follows the Interchange Shoalhaven Recruitment and Selection process which includes appropriate screening procedures. All staff and volunteers receive an appropriate induction and are aware of their child safety responsibilities, including reporting obligations.
 - [Recruitment and Selection](#)
 - [Screening](#)

- [iinduct](#) - Standards and Quality module: The United Nations convention on the rights of the child.
 - The online orientation/induction contains a specific module relating to all staff and volunteers who receive an appropriate induction and are aware of their child safety responsibilities. Refer to the screenshot “Standards and Quality” listed in Section 4: Attachments.

Standard 6:

- Interchange Shoalhaven implemented a reporting abuse policy that is child-focused.
 - [Reporting Abuse](#)
 - [Participant Complaints](#) - Policy
 - [Participants Complaint](#) - Work Instruction

Standard 7:

- Interchange Shoalhaven employees undertake regular training opportunities to ensure that they “understand their obligations on information sharing and recordkeeping”
 - One of the organisational practices is to have all our employees both paid and unpaid complete the Keep Them Safe online training: <http://ngolearning.com.au/> Training For NSW Non-Government Staff Working With Vulnerable Children And Families

Standard 8:

- Interchange Shoalhaven has implemented an [Acceptable Use of Electronic Media](#) policy which outlines the unacceptable use of its systems by employees.
 - “Staff may not use the internet or email access (including internal email access) provided by Interchange Shoalhaven to:
 - Create or exchange messages that are offensive, harassing, obscene or threatening;”

Standard 9:

- Interchange Shoalhavens [Quality Policy](#) sets out the continuous improvement process to regularly review and improve organisational practices which include child safe systems
 - The Quality Management System is based on a continuous improvement cycle and includes (but is not limited to) the following key processes:
 - Self-assessment and review of current practices and performance outcomes
 - Feedback from participants receiving services and involvement in continuous improvement

- Identification of improvements
- Making improvements
- Ongoing monitoring and continuous improvement, including systems for monitoring.

Standard 10:

- Interchange Shoalhaven has the following policies and procedures within the organisation that relate back to how the institution is child safe:
 - [Board Probity Checks](#)
 - [Code of Behaviour for Employees](#)
 - [Mandatory Reporting](#)
 - [Participant Complaints](#) - Policy
 - [Participants Complaint](#) - Work Instruction
 - [Participant Advocates](#)
 - [Positive Behaviour Support](#)
 - [Providing and requesting information](#) - under Chapter 16A.
 - Note that this will be updated inline with the change to Clause 8 (2) of the Children and Young Persons (Care and Protection) Regulation 2012 (Care Regulation).
 - The amendments allow NSW 'prescribed bodies' to directly share child protection information with statutory child protection bodies in other states and territories by making them 'prescribed bodies' for the purposes of Chapter 16A of NSW's Children and Young Persons (Care and Protection) Act 1998.
 - [Protection of Human Rights and Freedom from Abuse](#)
 - [Protective Behaviour Strategies](#)
 - [Quality Policy](#)
 - [Reporting Abuse](#)
 - [Screening](#)
 - [VOOHC](#)

Theme 2: Improving institutional responding and reporting

Measure:

Consistent with Child Safe Standard 1: Child safety is embedded in institutional leadership, governance and culture, institutions should have a clear code of conduct.

Report Volume:

Volume 7

Recommendation(s) the measure is in response to:

Recommendation 7.8

Descriptions of the recommendations:

The Code of Conduct should:

- Outlines behaviours towards children that the institution considers unacceptable, including concerning conduct, misconduct or criminal conduct
- Includes a specific requirement to report any concerns, breaches or suspected breaches of the code to a person responsible for handling complaints in the institution or to an external authority when required by law and/or the institution's complaint handling policy
- Outlines the protections available to individuals who make complaints or reports in good faith to any institution engaging in child-related work (see Recommendation 7.6 on reporter protections).

Description of measures implemented prior to December 2019:

- It is recognised that Interchange Shoalhaven Code of Conduct policy does not reflect the above recommendations and will require a review to include reference to the Reporting Abuse policy which is child-focused
 - [Code of Behaviour for Employees](#)
 - [Reporting Abuse](#)

Theme 3: Records and recordkeeping principles

Measure:

All institutions that engage in child-related work should implement the following principles for records and recordkeeping, to a level that responds to the risk of child sexual abuse occurring within the institution.

Principle 1: Creating and keeping full and accurate records relevant to child safety and wellbeing, including child sexual abuse, is in the best interests of children and should be an integral part of institutional leadership, governance and culture.

Principle 2: Full and accurate records should be created about all incidents, responses and decisions affecting child safety and wellbeing, including child sexual abuse.

Principle 3: Records relevant to child safety and wellbeing, including child sexual abuse, should be maintained appropriately.

Principle 4: Records relevant to child safety and wellbeing, including child sexual abuse, should only be disposed of in accordance with law or policy.

Principle 5: Individuals' existing rights to access, amend or annotate records about themselves should be recognised to the fullest extent.



Report Volume:

Volume 8

Recommendation(s) the measure is in response to:

Recommendation 8.4

Descriptions of the recommendations:

Principle 1: Creating and keeping full and accurate records relevant to child safety and wellbeing, including child sexual abuse, is in the best interests of children and should be an integral part of institutional leadership, governance and culture.

- Institutions that care for or provide services to children must keep the best interests of the child uppermost in all aspects of their conduct, including recordkeeping. It is in the best interest of children that institutions foster a culture in which the creation and management of accurate records are integral parts of the institution's operations and governance.

Principle 2: Full and accurate records should be created about all incidents, responses and decisions affecting child safety and wellbeing, including child sexual abuse.

- Institutions should ensure that records are created to document any identified incidents of grooming, inappropriate behaviour (including breaches of institutional codes of conduct) or child sexual abuse and all responses to such incidents.
- Records created by institutions should be clear, objective and thorough. They should be created at, or as close as possible to the time the incidents occurred, and clearly show the author (whether individual or institutional) and the date created.

Principle 3: Records relevant to child safety and wellbeing, including child sexual abuse, should be maintained appropriately.

- Records relevant to child safety and wellbeing, including child sexual abuse, should be maintained in an indexed, logical and secure manner. Associated records should be collocated or cross-referenced to ensure that people using those records are aware of all relevant information.

Principle 4: Records relevant to child safety and wellbeing, including child sexual abuse, should only be disposed of in accordance with law or policy.

- Records relevant to child safety and wellbeing, including child sexual abuse, must only be destroyed in accordance with records disposal schedules or published institutional policies.



- Records relevant to child sexual abuse should be subject to minimum retention periods that allow for delayed disclosure of abuse by victims, and take account of limitation periods for civil actions for child sexual abuse.

Principle 5: Individuals’ existing rights to access, amend or annotate records about themselves should be recognised to the fullest extent.

- Individuals whose childhoods are documented in institutional records should have a right to access records made about them. Full access should be given unless contrary to law. Specific, not generic, explanations should be provided in any case where a record, or part of a record, is withheld or redacted.
- Individuals should be made aware of, and assisted to assert, their existing rights to request that records containing their personal information be amended or annotated, and to seek review or appeal of decisions refusing access, amendment or annotation.

Description of measures implemented prior to December 2019:

Principle 1:

- Interchange Shoalhaven follows the Control of Quality Records policy to ensure that records are correctly recorded using the ISO format and stored appropriately for the required periods
 - [Document Control](#)
 - [Control of Quality Records](#)

Principle 2:

- Interchange Shoalhaven promotes a culture of reporting incidents as a positive measure with all of its employees.
 - [Incidents / Critical Incidents](#)

Principle 3:

- Interchange Shoalhaven follows the Control of Quality Records policy to ensure that records are correctly recorded using the ISO format and stored appropriately for the required periods
 - [Document Control](#)
 - [Control of Quality Records](#)

Principle 4:

- Interchange Shoalhaven recognises that an update of the Control of Quality Records will need to take place to include reference to: “Records relevant to child sexual abuse should be subject to minimum retention periods that allow for delayed disclosure of abuse by victims, and take account of limitation periods for civil actions for child sexual abuse.”

Principle 5:



- Interchange Shoalhaven provides participants and their nominees with the organisations Access to Confidential Information policy.
 - [Access to Confidential Information](#)

Prospective work that will be undertaken post-2019 to implement this measure:

1. Review of organisational policies and procedures inline with NDIS quality and safeguards audit against the NSW Disability standards. Ensure that relevant organisational policy and procedures reflect child safe standards and the Royal Commission into Institutional Responses to Child Sexual Abuse recommendations.
2. Interchange Shoalhaven Policies and Procedures are electronically available to all employees through the organisational Document Matrix. As part of the quality improvement process, Interchange Shoalhaven will be making organisational policies and procedures available online through its website during 2020.
3. Workforce training -
 - a. P.A.R.T training has been booked for January 2020.
 - b. Refresher on orientation - iinduct: All employees will be put through the linct training again
4. Update Interchange Shoalhaven's policy [Providing and requesting information](#)
 - a. Recommendations 8.6 - 8.8 the development and implementation of a nationally consistent information exchange scheme that allows child protection information to be shared across Australian borders.
 - i. NSW has made amendments to Clause 8(2) of the Children and Young Persons (Care and Protection) Regulation 2012 (Care Regulation) which commenced on 4 February 2019. The amendments allow NSW 'prescribed bodies' to directly share child protection information with statutory child protection bodies in other states and territories by making them 'prescribed bodies' for the purposes of Chapter 16A of NSW's Children and Young Persons (Care and Protection) Act 1998.

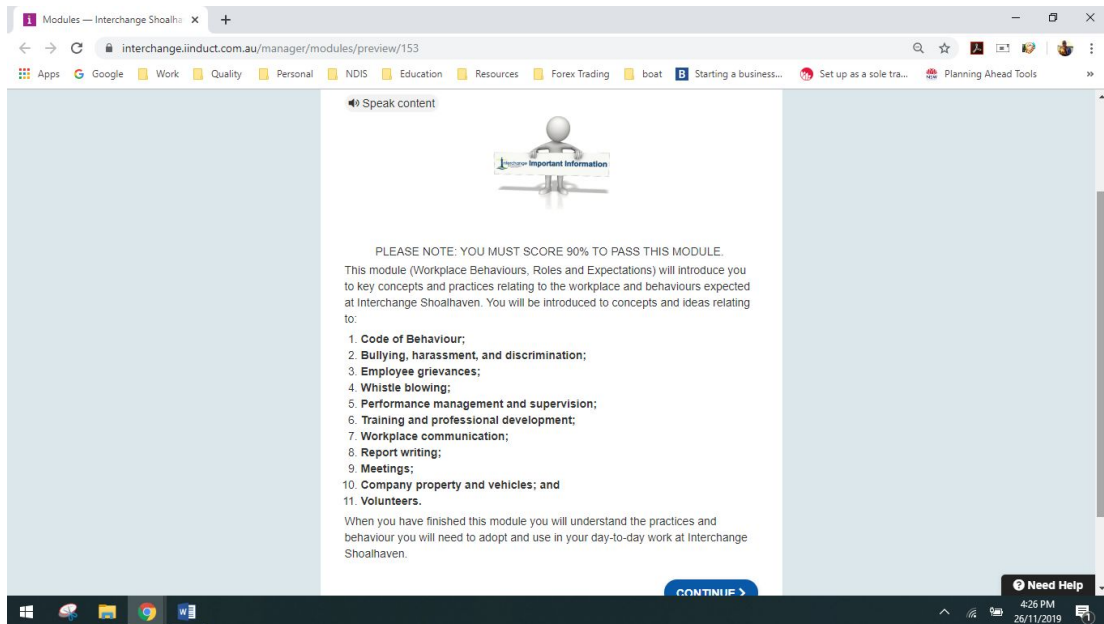
Section 3: Reporting for specific non-government institutions.

Not Applicable to our organisation.

Section 4: Attachments.

Screenshots of the iinduct module for Standards and Quality as well as Workplace Behaviours, Roles and Expectations

iinduct Module - Workplace Behaviours, Roles and Expectations:



Modules — Interchange Shoalhaven

interchange.iinduct.com.au/manager/modules/preview/153

Apps Google Work Quality Personal NDIS Education Resources Forex Trading boat Starting a business... Set up as a sole tra... Planning Ahead Tools

Speak content

Important Information

PLEASE NOTE: YOU MUST SCORE 90% TO PASS THIS MODULE.

This module (Workplace Behaviours, Roles and Expectations) will introduce you to key concepts and practices relating to the workplace and behaviours expected at Interchange Shoalhaven. You will be introduced to concepts and ideas relating to:

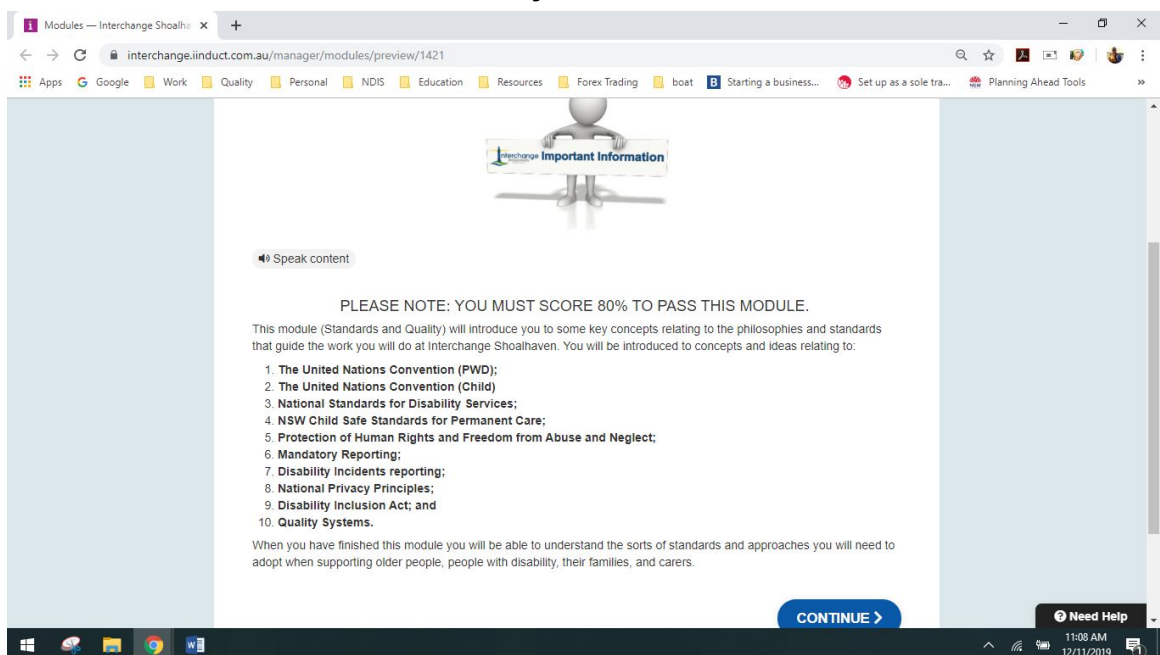
1. Code of Behaviour;
2. Bullying, harassment, and discrimination;
3. Employee grievances;
4. Whistle blowing;
5. Performance management and supervision;
6. Training and professional development;
7. Workplace communication;
8. Report writing;
9. Meetings;
10. Company property and vehicles; and
11. Volunteers.

When you have finished this module you will understand the practices and behaviour you will need to adopt and use in your day-to-day work at Interchange Shoalhaven.

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iinduct Module - Standards and Quality:



Modules — Interchange Shoalhaven

interchange.iinduct.com.au/manager/modules/preview/1421

Apps Google Work Quality Personal NDIS Education Resources Forex Trading boat Starting a business... Set up as a sole tra... Planning Ahead Tools

Speak content

Important Information

PLEASE NOTE: YOU MUST SCORE 80% TO PASS THIS MODULE.

This module (Standards and Quality) will introduce you to some key concepts relating to the philosophies and standards that guide the work you will do at Interchange Shoalhaven. You will be introduced to concepts and ideas relating to:

1. The United Nations Convention (PWD);
2. The United Nations Convention (Child)
3. National Standards for Disability Services;
4. NSW Child Safe Standards for Permanent Care;
5. Protection of Human Rights and Freedom from Abuse and Neglect;
6. Mandatory Reporting;
7. Disability Incidents reporting;
8. National Privacy Principles;
9. Disability Inclusion Act; and
10. Quality Systems.

When you have finished this module you will be able to understand the sorts of standards and approaches you will need to adopt when supporting older people, people with disability, their families, and carers.

CONTINUE >

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Interchange Shoalhaven iinduct modules content report:

1. iinduct - Online orientation modules content list:



- a. All current (and future) Interchange Shoalhaven employees have undergone online induction as part of their onboarding for employment with the organisation. Interchange Shoalhaven uses a service provider - [iinduct](#) to develop the content inline with federal and state legislation, best practises within the sector and organisational policy and procedures. The iinduct program covers the following topics:
- i. The NDIS Worker Orientation Module - Quality, Safety and You
 - ii. Welcome and Introduction
 - iii. Work Health and Safety
 1. An introduction to work health and safety;
 2. Risk management;
 3. Slips, trips and falls;
 4. Hazardous manual tasks and minimal lift;
 5. Workplace injuries (prevention and your role);
 6. Hazards and incidents;
 7. Infection control in community settings;
 8. Managing blood and body fluid spills;
 9. Managing sharps;
 10. Chemicals in the home and workplace;
 11. Smoke free workplace;
 12. Drugs and alcohol at work;
 13. First aid;
 14. Working alone and in people's homes;
 15. Safe food handling;
 16. Emergencies and fire safety;
 17. Water and sun safety;
 18. Managing fatigue; and
 19. Critical incidents.
 - iv. Standards and Quality
 1. The United Nations Convention (PWD);
 2. The United Nations Convention (Child);
 3. National Standards for Disability Services;
 4. NSW Child Safe Standards for Permanent Care;
 5. Protection of Human Rights and Freedom from Abuse and Neglect;
 6. Mandatory Reporting;
 7. Disability Incidents reporting;
 8. National Privacy Principles;
 9. Disability Inclusion Act; and
 10. Quality Systems.
 - v. Principles and Practice
 1. Person centred practice and planning;



2. Active support;
 3. Enablement;
 4. Respectful language;
 5. Duty of care and negligence;
 6. Dignity of risk;
 7. Positive behaviour support;
 8. Communication and positive behaviour support;
 9. Restrictive practices;
 10. Personal and professional relationships;
 11. Relationships and sexuality; and
 12. Culturally Appropriate Practice.
- vi. Workplace Behaviours, Roles and Expectations
1. Code of Behaviour;
 2. Bullying, harassment, and discrimination;
 3. Employee grievances;
 4. Whistle blowing;
 5. Performance management and supervision;
 6. Training and professional development;
 7. Workplace communication;
 8. Report writing;
 9. Meetings;
 10. Company property and vehicles; and
 11. Volunteers.
- vii. Essential Human Resource Processes
1. Salary Packaging;
 2. Employee Assistance Program;
 3. Rostering Practices;
 4. Leave;
 5. National Employment Standards;
 6. Award Structure; and
 7. The Five Ways to Wellness.
- viii. Medication Support
1. Introduction to medication;
 2. Groups of medication (tablets, non-tablets and PRN);
 3. Administering medication;
 4. Medication errors; and
 5. Medication documentation.
- ix. Direct Support
1. Support worker roles;
 2. Introduction to various disabilities;
 3. Personal care;



4. Diabetes and diabetes first aid;
5. Epilepsy and epilepsy first aid;
6. Skin care;
7. Allergies and Anaphylaxis;
8. Introduction to Asthma and Asthma first aid;
9. Swallowing and eating;
10. Introduction to Enteral (PEG) Nutrition and care;
11. Airway support;
12. Sleep Apnoea and CPAP machines;
13. Bowel care and continence;
14. Self harm and suicide;
15. Squalor and hoarding;
16. Drug and Alcohol abuse;
17. Supporting people with money; and
18. End of Life Support.

b. It is within the “Standards and Quality” and “Workplace Behaviours, Roles and Expectations” modules that the Code of Conduct, behavioural standards towards children, reporting requirements and handling complaints of child sexual abuse can be located.

- Interchange Shoalhaven is currently in the process of completing a review of its organisational policies and procedures inline with its Quality Assurance processes.
 - As part of the review, Interchange Shoalhaven will be updating the policies to ensure it meets the requirements / recommendations set down by the Royal Commission into Institutional Responses to Child Sexual Abuse.
- Audit all employees CRM profile to identify any gaps around employees who have not completed or need to refresh on Keep Them Safe online training <http://ngolearning.com.au/> Training For NSW Non-Government Staff Working With Vulnerable Children And Families

A handwritten signature in black ink, consisting of a large, stylized letter 'D' followed by a horizontal line.