

22 February, 2019

Dr Frank Lambrick
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Office of Professional Practice
Child Safe Standards Review Team
Department of Health and Human Services

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Via email: cssreview@dhhs.vic.gov.au

Dear Dr Lambrick,

Re: Review of Victoria’s Child Safe Standards

I write on behalf of members of the Australian Psychological Society (APS), the peak professional body for psychology in Australia, regarding the Review of Victoria’s Child Safe Standards. The APS has over 700 members in Victoria who identify as psychologists who work with children and young people in school settings and whose work is impacted by the Child Safe Standards

The APS whole heartedly supports the overarching principles of the Child Safe Standards which are designed to drive cultural change and to protect children from abuse in organisations such as schools.

While the APS welcomes this Review and is committed to the Standards being as strong as possible, I wish to raise with you our concern about the potential implications of the suggested risk management strategies cited in compliance documentation for psychologists who work in schools. I raise these issues with you as I believe they may place some children and young people at risk.

Of particular concern are the child safe arrangements required for psychologists who deliver a psychological service to children in school settings. Victoria has incorporated the child safe standards into school regulation by way of Ministerial Order No. 870 – *Managing the risk of child abuse in schools*. The Ministerial Order sets out specific actions that registered schools must take to comply with the standards. Subsequent Victorian Registration and Qualifications Authority (VRQA) advice in Standard 6: Child Safety Risk Management Strategies, gives an example of risk as “a child alone with one other person unsupervised”. The risk management strategy example to accompany this is for rooms where adults see children alone to have “Clear windows in walls to enable visibility of occupants”.

While the APS agrees that arrangements for school psychologists should aim to be consistent with a schools’ child safety strategies, policies and procedures, our members report that there has been inflexibility in the manner in which schools interpret this risk management strategy. Principals insist on a clear line of sight into counselling rooms and have been reported to have installed windows in counselling room walls and doors to facilitate this. It has been reported to the APS that some school sectors have implemented this in all schools.

The APS understands that schools and school psychologists should consider arrangements that are responsive to the school's systemic child safety risk assessment, and that are reasonable, proportionate to the risk posed to the child, practical and workable. The current wording of the VRQA risk management strategy suggests to schools that this requirement for a clear line of sight is a prescriptive accommodation. The APS has received requests for advice from principals who believe this to be the case.

The *APS Code of Conduct* and *The APS Ethical guidelines on confidentiality* are very clear on a psychologist's obligation to protect client privacy and confidentiality. This is the cornerstone of the therapeutic relationship that school psychologists have with students. We are concerned that when principals insist on a clear line of sight into student counselling rooms that this will have implications for some student's help-seeking behavior and potentially, some vulnerable young people will choose not to seek out the school psychologist for support. The current literal interpretation of the documentation by schools is in conflict with the professional obligations of psychologists and has the potential to place vulnerable young people at risk.

The APS recommends that the Child Safe Standards documentation be more specific in guiding schools that discussion about creating safe environments for children needs to take into account both the risk minimisation strategies suggested, the professional code for psychologists and the privacy of the psychologist/client therapeutic relationship. Risks must be mitigated without compromising a child's right to privacy and healthy child development. Arrangements for seeing children and young people can then be devised which are proportionate and practical, together with schools having in place a proactive approach to the engagement of all the standards to ensure child safety.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Frances Mirabelli', with a long horizontal flourish extending to the right.

Frances Mirabelli

Chief Executive Officer