

Suitability Policy

1. Purpose

Inala Community House (ICH) is committed to safeguarding the health, wellbeing and safety of all service users particularly those who may be vulnerable such as children and those with a disability. ICH seeks to ensure a safe and supportive environment is provided for all people within the community.

ICH aims to ensure the suitability of workers through the effective implementation of multiple systems including recruitment, performance management, feedback and complaints, screening checks, etc.

Workers may undergo different screening checks relevant to the work being performed and in accordance with legislative, regulatory and service requirements.

ICH has an obligation to remain compliant with all relevant legislation, regulations and service agreement obligations.

Screening requirements may be subject to change as required by any relevant legislation, regulation or service agreements.

2. Scope

This policy shall apply to all Board members, staff, students, trainees, volunteers and contractors engaged in service delivery. For the purposes of this policy, these persons shall be referred to as workers.

3. Policy

This policy seeks to address the suitability and screening requirements for workers within ICH. Screening checks along with general suitability requirements of workers seek to safeguard and uphold the following principles:

- The welfare and best interests of the service user are paramount
- Every service user has the right to be protected from harm

3.1 General Suitability

A worker must be suitable for the position they hold. This means that they must have appropriate experience, qualifications, skills and abilities in order to perform the duties of the position. These shall be outlined in Position Descriptions and job advertisements in accordance with the ICH *Recruitment Policy*.

ICH will aim to ensure worker suitability through performance management of workers in accordance with the ICH *Performance Management and Supervision Policies*.

ICH also has accessible feedback and complaint mechanisms which clients (and other relevant stakeholders) are encouraged to access if there are any concerns about a worker's suitability or the services they are receiving. Feedback and complaints are addressed in accordance with the ICH *Feedback and Complaint Policy*.

3.2 Screening

ICH has a range of screening requirements which are required by legislation and service agreements. Some of these include:

- Blue Cards
- Personal and Criminal History Checks (LCS2)
- NDIS Worker Screening checks
- Police Checks and PRODA
- National Personal Insolvency Index Search
- ASIC Historical Personal Name Search

If a worker refuses to complete the required screening checks for the position in a reasonable time, then this may result in disciplinary action up to and including termination of employment.

Blue Cards/Exemption Cards

Blue Cards (including exemption cards) are a state-based suitability check for working with children. It is an offence for a disqualified person to apply for a Blue Card.

ICH requires Blue Card screening checks for all workers (except volunteers where it is determined on a case by case basis, based upon their involvement with children). For all workers where a Blue Card is required, this is a condition of engagement with ICH. In accordance with the 'No Card, No Start' requirements, workers will not be able to commence working with children (or in child related work) without a valid blue card or exemption.

Any worker who already holds a Blue Card or exemption card will be linked through the Blue Card Portal.

Blue Cards are required to be renewed prior to the expiry date which is every 3 years (unless combined with a NDIS Worker Screening card in which case it may be longer than 3 years).

Upon a worker exiting ICH, their Blue Card will be de-linked from the Blue Card Portal.

ICH will also advise Blue Card Services where there is a change in the organisation's information such as: changes to ICH's name, address, contact details or authorised contacts, including when a contact person changes their name.

Personal and Criminal History Checks (LCS2)

LCS2 checks are completed through the government department responsible for child safety screening checks which is related to ICH's licence to operate the Out of Home Care Service.

All workers who are involved in the governance, management or delivery of the Out of Home Care Service must hold and maintain this check, this includes Board members, the Chief

Executive Officer and all workers within the OHC team. This check is also required of any risk assessed roles which involve:

- Physically touching a child in care (e.g. direct care, supervision, helping with day-to-day activities, accompanying them to activities or events)
- Building a rapport with a child in care (e.g. the opportunity to develop a trusting relationship with a child in person or via oral, written or electronic communication)
- Access to a child in care's personal details (e.g. having access to their details which enables contact to be made within or outside of the service, via oral, written or electronic communication, via a significant person in the child's life or after a child is no longer within the service)

Contractors may also need an LCS2 check if they meet the risk assessment criteria above.

Any workers requiring an LCS2 cannot commence their role until the suitability check has been processed and suitability confirmed.

LCS2s are required to be renewed prior to the expiry date which is every 2 years.

Workers who have completed an LCS2 are required to submit an LCS6 where their details change including: name, address, involvement with Queensland or any interstate/international child protection agencies, criminal history, Blue Card/exemption card or application, being the respondent in a domestic and family violence matter, traffic history (only driving under the influence of drugs or alcohol and dangerous driving).

NDIS Worker Screening

All workers who are involved in the governance, management or delivery of NDIS or other disability programs must hold a NDIS Worker Screening this includes Board members, the Chief Executive Officer and all workers within the NDIS or disability programs teams.

NDIS Worker Screening checks lasts for 5 years (concurrent with Blue Card expiry when a joint application is made) and must be renewed prior to the expiry.

Police Checks

All workers involved in the governance, or management or delivery of Family Day Care must hold a police check. These are required of all approved providers who administer Child Care Subsidy payments.

PRODA

Workers involved in the management or delivery of Family Day Care or NDIS services must have a PRODA account.

The PRODA account is a government system which incorporates an identity confirmation check. It allows users to access relevant service Portals for the purpose of service delivery.

National Personal Insolvency Index and ASIC Historical Persons Name Searches

All workers involved in the management of Family Day Care (including Board members, the Chief Executive Officer, Manager (FDC) and Nominated Supervisors) are required to conduct National Personal Insolvency Index and ASIC Historical Persons Name Searches.

While required for Family Day Care, ICH also acknowledges, that this is also good practice for Board members and the Chief Executive Officer in the administration of organisational funds and is a further accountability process for funding bodies.

3.3 Reporting and Negative Suitability Outcomes

A worker must immediately report any actual or potential conditions, circumstances, limitations or other actions/inactions which may adversely impact their suitability to perform the requirements of the position.

A worker must also inform ICH of any potential risks to the health, safety and wellbeing of service users, families and community members or to the reputation of ICH arising from matters relating to their suitability.

Upon being informed by the worker or advised by a relevant screening body that there is a change in the worker's suitability, ICH will take appropriate action which may include:

- Changing duties
- Training
- Investigating the situation
- Taking action in accordance with the ICH *Performance Counselling and Discipline Policy*
- Terminating employment

ICH may also be required to report to relevant screening or funding bodies any conditions, circumstances, limitations or other actions/inactions which may indicate that the worker is not a suitable person.

3.4 Maintenance of Screening Records

All records relating to screening of workers shall be kept on the relevant personnel file and shall be recorded and monitored through an appropriate register (using Powerapps).

3.5 Updates

ICH collects updated information from workers annually. As part of this process, ICH shall inform workers about relevant reporting or update processes (including requirement to notify relevant screening bodies of changes).

4. Review

This policy shall be reviewed every 2 years.

This policy remains in effect unless otherwise determined by resolution of the Board of Directors.

5. Related Documents

Policies

ICH Code of Conduct Policy
ICH Conflict of Interest Policy
ICH Performance Management Policy
ICH Supervision Policy
ICH Performance Counselling and Discipline Policy
ICH Recruitment Policy
ICH Feedback and Complaints Policy
ICH Service User Protection Policy
ICH Ending Employment Policy

Legislation

Working with Children (Risk Management and Screening) Act 2000 (Qld)
Child Protection Act 1999 (Qld)
Child Protection Regulation 2023
NDIS (Practice Standards – Worker Screening) Rules 2018 (Cth)
Disability Services Act 2006 (Qld)
A New Tax System (Family Assistance) (Administration) Act 1999