

Policy Title:	Child and Vulnerable People Safety Policy
Policy Number:	05
Last Amended Date:	January 2025
Supersedes:	LHCK018
Author:	Operations Manager
Owner:	Chief Executive Officer
Endorser:	Lionheart Board
Date Endorsed:	10/02/2025
Next Review Due:	February 2027

INTRODUCTION

Lionheart Camp for Kids (Lionheart) provides support to vulnerable children, young people and their families. Lionheart takes its duty of care to children and families very seriously and aims to provide a safe environment on all programs and activities, and during all services provided by Lionheart.

Lionheart adopts the ChildSafe Safety Management System (SMS) and is committed to the sound implementation of it. This policy is intended to help Lionheart achieve this.

PURPOSE

This policy has been developed to provide guidance to staff and volunteers regarding the prevention, management, and reporting of any concerns relating to the harm of young and/or vulnerable people during any Lionheart programs, events and services.

DEFINITIONS

Child: The age-related definition of a child varies between Australian states. For the purpose of consistency across Lionheart, a child will be defined as a person under the age of 18.

Vulnerable People: Vulnerable people can include children and seniors, people with impaired intellectual or physical functioning, people from a low socio-economic background, people who are Aboriginal or Torres Strait Islanders, people who are not native speakers of the local language, people with low levels of literacy or education, people subject to modern slavery, which involves human exploitation and control, such as forced labour, debt bondage, human trafficking, and child labour.



Participant: A participant refers to a child, adolescent or adult attending a Lionheart program, event or otherwise engaged in with a Lionheart service.

Program Facilitator: A Program Facilitator refers to a Lionheart staff member or sub-contractor engaged to facilitate a group at a Lionheart program or event.

Physical abuse: Occurs when a person purposefully injures or threatens to injure a child or young person. This may include, but is not limited to slapping, punching, shaking, kicking, burning, shoving or grabbing.

Emotional abuse: Occurs when anyone is repeatedly rejected or frightened by threats. This may involve name calling, being put down or continual coldness from another person to the extent that it affects the child's physical and emotional growth.

Neglect: The failure to provide people with the basic necessities of life, such as food, clothing, shelter, supervision or care to the extent that the child's health and development are placed at risk.

Sexual abuse: Occurs when a child or young person is used by an older or bigger child, adolescent or adult for his or her own sexual stimulation or gratification. These can be contact or non-contact acts, including threats and exposure to pornography.

Bullying: The inappropriate use of power by an individual or group, with intent to injure physically or emotionally. It is usually deliberate and repetitive. Bullying may be physical or psychological (verbal and non-verbal).

Exposure to Family or Domestic Violence: Occurs when children and young people witness or experience the chronic domination, coercion, intimidation and victimisation of one person by another through physical, sexual or emotional means within intimate relationships or within family relationships.

STATEMENT OF COMMITMENT

This statement affirms that Lionheart:

- actively works to listen to and empower children
- has a zero tolerance for child abuse
- has systems to protect children from abuse, and will take all allegations and concerns very seriously and responds to them consistently in line with our organisational policies and procedures
- is committed to promoting cultural safety for Aboriginal children, cultural safety for children from culturally and/or linguistically diverse backgrounds, and to providing a safe environment for children with a disability.

ACCOUNTABILITY AND RESPONSIBILITY

The Lionheart Board is ultimately accountable to ensure the safety, well-being and protection of the young people that Lionheart supports. The Lionheart Board or delegate will guide staff decision-making and reporting and assist Program Facilitator in carrying out their duties in relation to child protection.

The Lionheart Board or delegate has the responsibility of overseeing all reports concerning the safety and/or welfare of Participants at Lionheart.

The Lionheart Board or delegate is responsible for ensuring the Child and Vulnerable People Safety Policy is reviewed and updated periodically, understood and complied with, and will provide advice and information on any aspect of child safeguarding and Participant safety and welfare to everyone at Lionheart.

The Lionheart Board or delegate has the responsibility to ensure that all staff, Program Facilitators and Volunteers who will be working with children and young people at Lionheart programs and events have valid Working With Children Checks.

Mandatory reporting of suspected child abuse exists in all State and Territories in Australia. However, differences exist in the legislation across States and Territories about the basis for reporting, who should report, and what should be reported.

Information on the Mandatory Reporting of Child Abuse may change from time to time due to updates in the legislation. For the latest information please visit the [Australian Institute of Family Studies](#).

The AIFS website contains legislative information on

- The concern (or 'state of mind') that forms the basis for reporting
- Who must report
- What must be reported

POLICY

Lionheart maintains an open and aware environment where all staff, volunteers and participants work towards the prevention of all forms of harm to participants, including child abuse. Any concerns for the safety or welfare of a participant must be raised in accordance with the procedure outlined in this policy (see Appendix 1).

Mandatory Reporting is the state-based legal requirement of a person who works for an organisation such as Lionheart to report any suspected cases of child sexual abuse. Although not all Lionheart staff, facilitators and volunteers will be mandatory reporters under legislation, for consistency *all cases where a reasonable belief that any kind of abuse has occurred, will be reported according to the processes outlined in this policy.*



A person only needs reasonable grounds to suspect that a child is at risk of harm. Reports must be made to the Department of Communities – Child Protection and Family Support. Failure to report can result in a personal fine, but most importantly, can put the child or young person at risk of harm.

Disclosure or suspicion of abuse or harm should always be taken seriously. All child protection related concerns and suspicions by staff, however minor, must be reported. Reporting is not at the staff or participant's discretion.

PROCEDURE

Creating a Safe Environment

Lionheart requires all staff to conduct a child protection risk analysis of all programs and activities.

Staff should:

- Identify the “concern” or risk factor to the safety and/or wellbeing of Participants whilst participating in the activity or program
- Evaluate the “concern” as a high, medium or low risk
- Identify mitigation strategies to minimise the likelihood of harm occurring
- Determine an acceptable level of risk in consultation with the Operations Manager or CEO (or delegate).

Lionheart will create a safe environment that:

- Encourages open communication with Participants.
- Empowers young people to speak up about what makes them feel safe.
- Enables young people to raise concerns about their safety and welfare.

Refer to Appendix 2 for Lionheart's Code of Conduct in Relation to Child Safety for all board members, employees, contractors and volunteers.

Reporting concerns

- If a visitor, contractor or other organisation is concerned about the risk of harm or incident they are expected to discuss this with a Lionheart staff member as soon as possible.
 - As standard practice, any adult who believes a child is in immediate danger or life-threatening situation should contact the Western Australia Police Force immediately by dialing 000.
 - Or, if they are concerned about a child's wellbeing (and it doesn't require immediate Police attention), please contact the Department of Communities on 1800 273 889.



- If a parent, sibling, relative or partner is concerned about a risk of harm or incident they should discuss this with a Lionheart staff member or volunteer immediately.
- If a staff member or volunteer reasonably suspects a Participant is at risk of harm, or has been harmed, they should report this concern as soon as possible according to Appendix 1. This may include disclosure, suspicion, concern or allegation of child abuse or harm.
- All Participants at Lionheart are encouraged to raise or report any concerns or complaints they have regarding their own safety or wellbeing or that of another Participant.
- The Program Facilitator, will be responsible for reporting protective concerns to authorities, handing communications with them, and completing required documentation.
- The Program Facilitator will notify the Lionheart Board or delegate of any concerns that have been raised or reports that have been made.

Consultation and Action

- In cases where the Program Facilitator believes there is a serious risk to a young person's safety or well-being, they will take immediate action to report to the appropriate authorities, and complete required documentation of the process.
- As needed the Lionheart Board will provide advice on whether a formal report to child protection authorities is required and guide staff in this process.
- The Operations Manager, Chief Executive Officer or Board Member will decide how the concern will be handled, this could result in the following:
 - No further action
 - A report to child protection authorities
 - A report to police
- If the Participant will be at risk after leaving the Lionheart program, the Program Facilitator and Lionheart Board or delegate will discuss the direction to take to minimise the immediate risk to the Participant.
- Parents/guardians should usually be involved in the discussions with regards to any safeguarding concerns, however in unusual circumstances, the Program Facilitator and/or Lionheart Board should determine the extent to which the parent or guardian is involved in the discussion.

Storage of Reports

Physical reports will be stored securely at the Lionheart Office in a locked cabinet, and electronic reports will be stored securely in a locked file on Operations Management Site. Documentation is stored for 45 years before being securely destroyed.



Confidentiality

All reports, including the names of people involved and the details will remain confidential. Only the relevant Program Facilitators, Lionheart Board or delegate, the Participants and persons involved will be informed of the report. Details will be released on a “need to know” basis or when required by law or a notification to police or child protection authorities is made.

Outcomes

This includes:

- Case handled by police or child protection authority
- No further action

Follow up

- Follow up with Participant, parents and relevant staff participant or volunteer by CEO, Lionheart Board or delegate as appropriate.
- Participant offered referral to appropriate support services such as child abuse counselling.
- Debriefing to be arranged if necessary.
- If disclosure took place in a discussion group or other Participants were present it is advisable to debrief with these Participants as soon as possible, preferably whilst Participants are still on the program. Further advice on this should be sought from the Operations Manager or CEO, in consultation with the Lionheart Board if needed.

Considerations: Disclosure of abuse

When a child or vulnerable person tells you that they have been harmed, it is important to remain calm and in control and to reassure the person that steps will be taken to keep them safe.

If an individual discloses abuse, it is important to remember that the reason they have disclosed to you is because they trust you. There are three very important things to tell the person if they disclose to you:

- I believe you
- It is not your fault
- You were right to tell me

You will not be helping the person if you:

- Make promises you cannot keep, such as promising that you will not tell anyone. As a Mandatory Reporter you are required by law to inform the appropriate authorities.
- Push the person into giving details of the abuse. Your role is to listen to what they want to tell you and not to conduct an investigation (beware of asking any leading questions as this may prejudice any subsequent investigation)



- Indiscriminately discuss the circumstances of the individual with others not directly involved.

Do not quiz or force the child or vulnerable person to disclose more than they are comfortable with. Your role is to support and listen to the Participant, not to conduct an investigation.

Write down the facts as soon as possible (preferably after the disclosure). Try and use the individual's exact words and record all the facts they have disclosed to you.

REVIEW

This policy will be reviewed every two years, and following every reportable incident. The review will assess whether this policy and related procedures require modification to better safeguard children and vulnerable people in Lionheart's care.

RELATED DOCUMENTS

Bullying Policy
Crisis & Incident Management
Our People Policy
SunSmart Policy
Record-Keeping Policy

REFERENCES

Australian Childhood Foundation (2024). *Safeguarding Children – Foundational Knowledge*. [Watch and Learn - Australian Childhood Foundation Professionals](#)

Australian Institute of Family Studies (2023). *Mandatory reporting of child abuse and neglect*. [Mandatory reporting of child abuse and neglect | Australian Institute of Family Studies \(aifs.gov.au\)](#)

Bromfield, L. & Higgins, D. (2005). *National Comparisons of Child Protection Systems*. Australian Institute of Family Studies 22(1).

ChildSafe (2024). *Safety Management System: Child Safety & Wellbeing Policy Version 4.23*.

Child Wise (2004). *Choose With Care: 12 steps to a child safe organisation*. [untitled \(childabuseroyalcommission.gov.au\)](#)

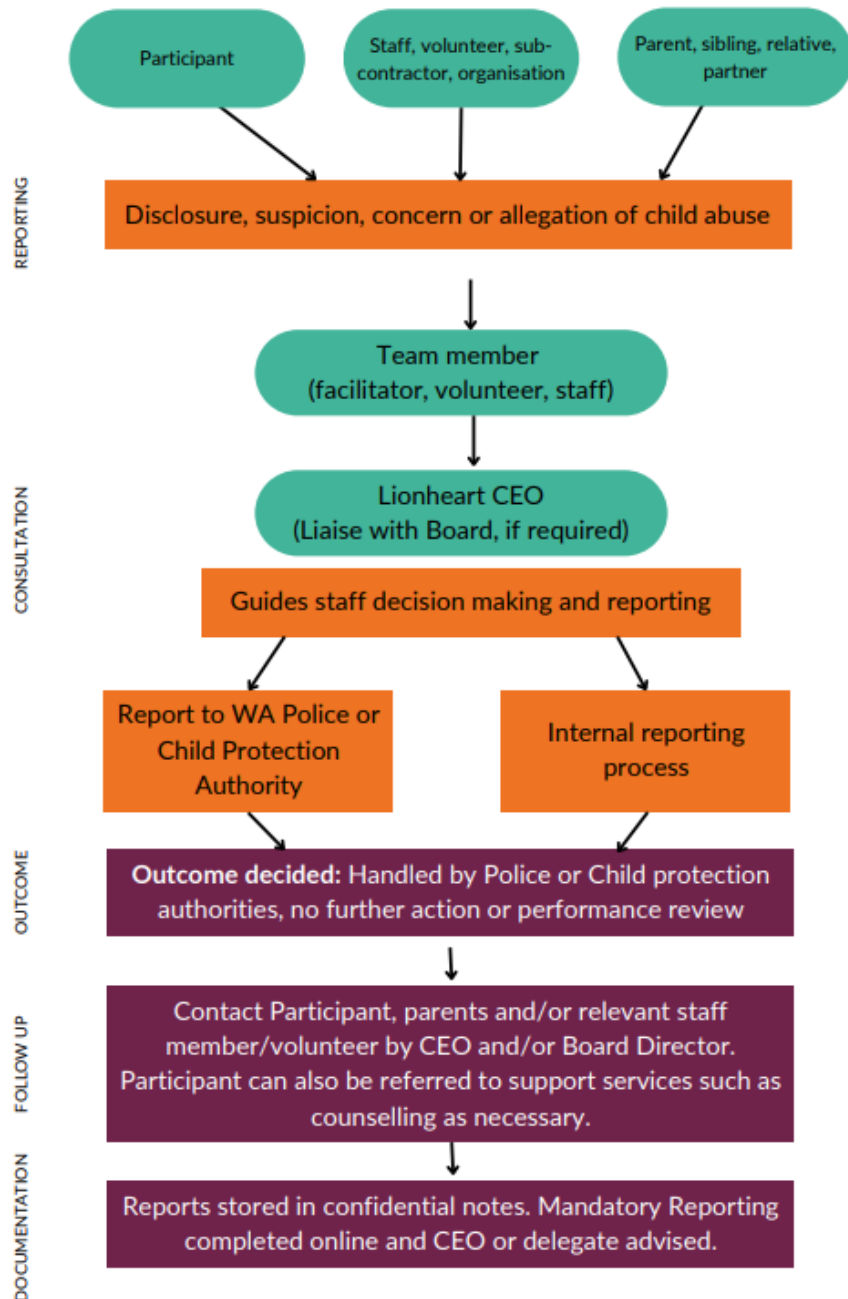
Commonwealth of Australia (2017). *Final Report – Record Keeping and Information Sharing*. Royal Commission into Institutional Responses to Child Sexual Abuse. [Final Report - Volume 8, Recordkeeping and information sharing \(childabuseroyalcommission.gov.au\)](#)

KEY CONTACT PERSON

For further information please contact the Operations Manager by emailing enquiries@lionheartcampforkids.com.au.

APPENDIX 1

LIONHEART REPORTING PROCESS





APPENDIX 2

Code of Conduct in relation to Child Safety

For all board members, employees, contractors and volunteers

Culture

We are a not-for-profit organisation supporting grieving children and their families. All board members, employees, contractors and volunteers must act with decency, dignity, respect and responsibility; in a manner supporting Lionheart's mission and vision and reflecting our values of belonging, courage, empowerment, excellence and trust.

Legislation

You must comply with all applicable Australian laws, including any Act or law of Western Australia and any instrument made under an Act or law. You must seek guidance from your Volunteer Coordinator, or Lionheart staff representative if unsure your behaviour breaches any laws.

Child Protection

Lionheart has a legal and moral responsibility to protect children and young people in our care, ensuring they feel safe. In line with Lionheart's safeguarding children-related policies, you must agree to and put in this to the following code of conduct:

1.1 Discrimination

We expect personnel to treat all children and young people fairly, equally and with dignity. Our organisation abides by the United Nations Convention on the Rights of a Child. All actions and behaviours from our personnel must be non-discriminatory and always in the best interests of the child or young person.

Everyone has the right to feel safe and be free from discrimination. No one within our organisation will be discriminated against based on age, gender, race, colour, language, disability, religion, political or other opinion, sexual orientation, national or social origin or their ability to live at home.

Our organisation does not tolerate discriminatory behaviours, and prejudiced attitudes will be challenged. Our Personnel must have working knowledge of our complaints handling processes to provide support and access to information, should any child, young person or family in our service require it.

1.2 Promoting equity and diversity

Personnel must ensure their approach and interactions with children and young people are sensitive, respectful and inclusive of all backgrounds and abilities. Our personnel must actively anticipate children and young people's diverse circumstances and respond effectively to those with additional vulnerabilities.

Where our organisation is involved with children and young people who are Aboriginal or Torres Strait Islander, from culturally and / or linguistically diverse backgrounds, have a disability, LGBTQIA+ and those who are unable to live at



home, our personnel will promote their safety (including cultural safety), participation and empowerment.

Our organisational culture is inclusive and respectful of the different ways that families are formed and structured. Our personnel are to respect decisions that people make about their gender identity and consult and support children and young people to feel, and to be, safe.

1.3 Positive guidance

We strive to ensure that children and young people participating in our activities, programs, services and / or facilities are aware of the acceptable limits of their behaviour so that we can provide a positive experience for all participants.

Children and young people are encouraged to feel safe and be safe and have positive relationships and friendships with their peers.

Children and young people are informed of their rights and are encouraged to have their say and participate in all relevant organisational activities and decisions, particularly in relation to matters affecting them. Children and young people are given information about the behaviour our organisation expects from them, the behaviour they can expect from our personnel, their right to safe participation in activities and access to information about child abuse prevention programs.

However, there are times when personnel may be required to use appropriate techniques and behaviour management strategies to ensure:

- an effective and positive environment; and
- the safety and / or wellbeing of children, young people or personnel participating in our activities, programs, services and / or facilities.
- We require our personnel to use strategies that are fair, respectful and appropriate to the developmental stage of the children or young people involved. The child or young person needs to be provided with clear directions and given an opportunity to redirect their misbehaviour in a positive manner.

Under no circumstances are our personnel to take disciplinary action involving physical punishment or any form of treatment that could reasonably be considered as degrading, cruel, frightening or humiliating.

1.4 Sexual misconduct

Under no circumstances is any form of sexual behaviour to occur between, with, or in the presence of children or young people participating in any of our activities, programs, services and / or facilities. Engaging in sexual behaviour with children and young people (or former clients/members) participating in our programs and services is prohibited, even if the young persons involved are above the legal age of consent.



Sexual behaviour needs to be interpreted widely, to encompass the entire range of actions that would reasonably be considered sexual in nature, including but not limited to:

- contact behaviour – such as sexual intercourse, kissing, fondling, sexual penetration or exploiting a child through prostitution; and
- non-contact behaviour – such as flirting, sexual innuendo, inappropriate text messaging, inappropriate photography or exposure to pornography or nudity.

1.5 Adhere to professional role boundaries

Staff and volunteers must adhere to their professional role boundaries including:

- not providing unauthorised transportation, for example picking a child up from home by themselves;
- not engaging in activities with children or young people outside Lionheart organised activities;
- not providing any form of support to a child or young person, or their family, unrelated to Lionheart for example, providing child-minding;
- not seeking contact with children or young people outside our programs, this includes any social media forums;
- not accepting an invitation to attend any private social function at the request of a child or young person (or at the request of their family) who has participated, or is participating, in our programs;
- not developing any relationships with children who could be seen as favouritism or grooming (for example offering gifts at programs or special treatment for specific children); and
- not engaging in open discussions of a mature or adult nature in the presence of children (for example, conversations detailing personal social activities).

If any of our personnel become aware of a situation in which a child or young person requires assistance that is beyond the confines of that person's role, or beyond the scope of our organisation's usual service, they should at the earliest opportunity; seek advice from management, refer the matter or child or young person to an appropriate support agency, or contact the child or young person's parent / care giver.

1.6 Gift giving

The practice of personnel giving gifts to children and young people participating in our services and programs is strongly discouraged and should not be common or frequent in occurrence.

Personnel are not to give gifts of a personal nature that encourages children and young people to think they have an individual and special relationship. The singling out of an individual child or young person within our organisation to give a gift to, is not permitted.



1.7 Appropriate language and tone

Language and tone of voice used in the presence of children and young people should be:

- fair and appropriate to their age;
- provide clear direction, boost their confidence, and encourage; and
- not harmful to children, discriminatory, racist, sexist, derogatory, belittling, or negative, threatening, profane or sexual.

1.8 Photography

Photographs of children and young people can only be taken by a Lionheart assigned photographer with consent obtained from the parent/guardian before every program or event.

1.9 Appropriate physical contact

Any physical contact must be appropriate to the delivery of our activities, programs and services and based on the needs of the child or young person. For example, assisting or comforting a distressed child, after permission has been sought from the child or when initiated by the child.

Under no circumstances should physical contact involve:

- inappropriate touching;
- overly physical touch (for example, wrestling, horseplay, or other roughhousing);
- unnecessary touch (for example, assisting with toileting when a child does not require assistance);
- initiated touch against the wishes of the child or young person, except if such contact may be necessary to prevent injury to the child or young person or to others, in which case:
- physical restraint should be a last resort;
- the level of force used must be appropriate to the specific circumstances, and aimed solely at restraining the child or young person to prevent harm to themselves or others; and
- the incident must be reported to management as soon as possible.

Our personnel are required to report to management any physical contact initiated by a child or young person that is sexual and/or inappropriate, for example, acts of physical aggression, as soon as possible, to enable the situation to be managed in the interests of the safety of the child or young person, our personnel and any other participants.

1.10 Supervision

Lionheart staff, facilitators and volunteers are responsible for actively supervising children and young people during program and events, to ensure all children and young people engage positively, behave appropriately toward one another and are in a safe environment. All Lionheart team members are required to avoid one-to-one situations with children, ensuring that activities and conversations with children and young people occur in view of other personnel.



1.11 Bathroom/change room arrangements

Lionheart team members are required to supervise children and young people in bathrooms and / or change rooms while balancing that requirement with a child or young person's right to privacy.

In addition:

- Team members should avoid one-to-one situations with a child or young person in a bathroom and / or change room area;
- Team members are not permitted to use the change room area to, for example, undress, while children and young people are present;
- Team members need to ensure adequate supervision in bathrooms /change rooms when they are used;
- Team members need to provide the level of supervision required for preventing abuse by members of the public, adult service users, peer service users, or general misbehaviour, while also respecting a child's or young person's privacy;
- When monitoring bathroom and / or change rooms, team members are to knock loudly / identify themselves prior to entering the area and where possible take another supervising adult;
- Female team members are not to enter male bathrooms / change rooms and male personnel are not to enter female bathrooms / change rooms; and
- Team members are to use bathrooms and change rooms specific to their identified gender or designated gender neutral bathrooms / change rooms
- If a child or young person requires assistance (i.e. their has been a toileting accident), they must first seek to contact the child's parent/caregiver to discuss their preferred appropriate to helping (i.e. adult coming to assist child themselves, child to change etc.).

1.12 Transport

Children and young people are not permitted to be transported by any Lionheart team members to, from or during any Lionheart events or programs. Exceptions may be considered under some circumstances, with the approval from the CEO or Operations Manager and with the consent of the parent/caregiver.

1.13 Social Media & Media

Lionheart team members are not permitted to befriend or engage with Lionheart children under the age of 18 on social media or communicate with them via emails or electronic communication (texts). Photos of Lionheart children are also not permitted to be uploaded on personal networking sites.

1.14 Confidentiality

Lionheart team members are not permitted to share any sensitive or confidential information, except to the extent you may be required, by law, to disclose it. All reasonable and necessary precautions to prevent the disclosure of any confidential information must be made, and team members agree not to disclose confidential information to any third party without first obtaining the written consent of Lionheart, except in the ordinary and proper course of your role with Lionheart.