



<b>Policy Title:</b>	Child and Vulnerable People Safety Policy
<b>Policy Number:</b>	05
<b>Last Amended Date:</b>	21/04/2026
<b>Supersedes:</b>	LHCK018
<b>Author:</b>	Operations Manager
<b>Owner:</b>	Chief Executive Officer
<b>Endorser:</b>	Lionheart Board
<b>Date Endorsed:</b>	22/04/2026
<b>Next Review Due:</b>	22/04/2028

## 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 seriously and aims to provide a safe environment during all programs, activities and services.

Lionheart is committed to implementing the National Principles for Child Safe Organisations and embedding safeguarding into organisational culture, governance and service delivery (National Principle 1, 10).

Lionheart adopts a Child Safe Safety Management System (SMS) to support prevention, identification and response to risks affecting the safety and wellbeing of children and vulnerable people.

## PURPOSE

This policy provides guidance to staff, volunteers and contractors regarding the prevention, management and reporting of any concerns relating to harm or risk to children and vulnerable people participating in Lionheart programs, events and services.

This policy supports:

- protection of children and vulnerable people
- clear reporting pathways for safeguarding concerns
- accountability across leadership and governance
- compliance with Australian and Western Australian safeguarding legislation
- continuous improvement in safeguarding practices (National Principles 1, 6, 9).

## DEFINITIONS

- *Child:* For the purpose of this policy, a child is defined as a person under the age of 18.
- *Vulnerable People:* Vulnerable people may include children, seniors, people with disability, people experiencing socio-economic disadvantage, Aboriginal and Torres Strait Islander people, culturally and linguistically diverse people,



people with low literacy or education, and people subject to exploitation such as modern slavery or trafficking. In the context of Lionheart, we may also consider all our participants (grieving families) as a vulnerable people group.

- **Participant:** A child, adolescent or adult attending a Lionheart program, event or service.
- **Program Facilitator:** A Lionheart staff member or contractor responsible for leading or facilitating a program activity.
- **Reasonable Grounds:** A belief based on observation, disclosure, or professional judgement that a child may be at risk of harm.
- **Reportable Conduct:** Conduct of an employee, volunteer or contractor involving child abuse, including sexual offences, sexual misconduct, physical assault, significant neglect, or behaviour causing serious emotional or psychological harm to a child.
- **Reportable Conduct Scheme (WA):** The Western Australian scheme requiring organisations to notify the Ombudsman when allegations of child abuse are made against employees, volunteers or contractors and to investigate those allegations.
- **Types of Abuse and Harm:**
  - **Physical:** 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:** Occurs when a child or young person experiences persistent rejection, intimidation, threats, humiliation or exposure to harmful behaviour that affects their emotional wellbeing or development.
  - **Neglect:** Occurs when a child's basic needs are not met to the extent that their health, development or wellbeing is at risk. This may include failure to provide adequate food, clothing, shelter, supervision or medical care.
  - **Sexual:** occurs when a child or young person is involved in sexual behaviour that is exploitative, coercive, or inappropriate to their age or developmental level. It may be perpetrated by an adult, adolescent, or another child, including those of the same age or younger where there is a power imbalance, or where one child is pressured, manipulated, or harmed. Sexual abuse includes physical and non-contact behaviours such as grooming, sexualised communication, exposure to pornography or sexual acts, inappropriate touching, sexual penetration, or online exploitation, and often involves coercion, fear, or misuse of power.
  - **Bullying:** The misuse of power by an individual or group to harm another person physically, emotionally or socially. Bullying may be deliberate and repeated and can include physical, verbal or online behaviour.
  - **Exposure to Family or Domestic Violence:** Occurs when a child witnesses or experiences violence, intimidation or coercive control within family or intimate relationships.

## STATEMENT OF COMMITMENT

Lionheart affirms that it:

- actively listens to and empowers children and young people (National Principle 2)
- has zero tolerance for child abuse
- has systems to prevent and respond to safeguarding risks
- promotes cultural safety for Aboriginal children
- supports inclusion for children with disability and children from culturally diverse backgrounds (National Principle 4)
- works in partnership with families and communities to promote safety and wellbeing (National Principle 3).

## ACCOUNTABILITY AND RESPONSIBILITY

The Lionheart Board is ultimately accountable for ensuring the safety and wellbeing of participants.

The Board will:

- oversee safeguarding governance and compliance (National Principle 1)
- ensure safeguarding risks are included in organisational risk registers
- receive reports on safeguarding incidents and trends
- review this policy at least every two years or following a significant incident

The CEO and Operations Manager are responsible for:

- implementing safeguarding procedures
- responding to concerns and allegations
- reporting concerns and allegations to the Board
- ensuring staff and volunteers receive appropriate safeguarding training (National Principle 7)
- maintaining records and registers relating to safeguarding.

All staff, volunteers and contractors share responsibility for maintaining a safe environment and must report any concerns relating to participant safety.

## POLICY

Lionheart maintains an open and aware environment where staff, volunteers and participants work towards preventing harm.

All safeguarding concerns must be reported in accordance with the procedures outlined in this policy.

Lionheart complies with:

- Mandatory reporting obligations under the Children and Community Services Act 2004 (WA)
- Working with Children (Criminal Record Checking) Act 2004 (WA)
- WA Reportable Conduct Scheme

Reports must be made where there are reasonable grounds to suspect a child is at



risk of harm. Reporting is not at the staff or participant's discretion.

## **PROCEDURE**

### **Creating a Safe Environment**

Lionheart requires staff to undertake safeguarding risk assessments for all programs and activities (National Principle 8).

Risk assessments must consider:

- supervision requirements
- environmental hazards
- emotional and psychological safety
- participant vulnerabilities
- staffing and supervision ratios
- emergency procedures

Risk mitigation strategies must be approved by the Operations Manager or CEO before program delivery.

Children and young people are encouraged to speak up about concerns regarding their safety or wellbeing (National Principle 2). This is communicated to children and young people at the start of programs, during welcome and group agreement sessions. Facilitators are clearly identified, and children and young people are encouraged to speak up about any concerns they may have.

### **Reporting concerns**

Anyone who suspects a participant is at risk of harm must report the concern immediately.

If a child is in immediate danger: Contact WA Police – 000

If concerned about a child's wellbeing: Report concerns internally according to Appendix 1. Staff and volunteers may also make direct contact with the Department of Communities to report concerns – 1800 273 889.

Concerns may include:

- disclosure of abuse
- suspicion of abuse
- concerning behaviour
- allegations involving staff or volunteers.

### **Responding to a disclosure**

If a child or vulnerable person tells you that they have been harmed, it is important to remain calm, supportive and reassuring. Your response can significantly influence whether the individual feels safe to continue seeking help and support.

Children and vulnerable people often disclose abuse to someone they trust. Staff and volunteers should recognise the courage it takes for a person to



share this information and respond in a respectful and supportive manner (National Principle 2).

When a disclosure occurs, the following responses are important:

- Remain calm and listen carefully.
- Reassure the individual that they have done the right thing by speaking up.
- Let them know that their safety and wellbeing are important and that steps will be taken to help keep them safe.

There are three key messages that should be communicated to the person making the disclosure:

- *I believe you.*
- *It is not your fault.*
- *You were brave to tell me.*

These responses help reinforce trust and support the individual's wellbeing (National Principle 2).

When responding to a disclosure, staff and volunteers must avoid actions that could cause additional distress or interfere with a formal investigation.

Lionheart team members must not:

- Make promises that cannot be kept, such as promising that the information will remain secret, as it may be required by law to report concerns to the appropriate authorities.
- Ask leading or investigative questions or pressure the individual to provide further details.
- Attempt to investigate the situation themselves.
- Discuss the disclosure with individuals who are not directly involved in the reporting or response process.

Only those responsible for safeguarding and responding to concerns should be informed, in accordance with Lionheart's reporting procedures (National Principle 6).

### **Supporting the Individual following a disclosure**

Staff and volunteers should:

- Allow the child or vulnerable person to share information at their own pace.
- Avoid pressing for details or forcing the individual to say more than they are comfortable sharing. Do not ask probing questions.
- Focus on listening and providing reassurance.

The role of staff and volunteers is to support the individual and report concerns, not to conduct an investigation.

### **Recording the Disclosure**

As soon as possible after the disclosure, staff must document the



information accurately.

Documentation should include:

- the date, time and location of the disclosure
- the name of the person making the disclosure
- the exact words used by the individual where possible
- any observations made at the time
- any immediate actions taken.

Accurate documentation supports appropriate reporting and response processes (National Principle 10). All documentation must be stored securely in accordance with Lionheart's record keeping procedures as outlined in Lionheart's *Record Keeping Policy*.

### **Reportable Conduct**

If an allegation involves the conduct of a Lionheart employee, volunteer or contractor, the CEO must notify the Ombudsman WA under the Reportable Conduct Scheme.

Lionheart will:

- notify the Ombudsman within required timeframes
- conduct an internal investigation
- cooperate with oversight by the Ombudsman

### **Consultation and Action**

The Operations Manager, CEO or Board will determine appropriate action which may include:

- referral to child protection authorities
- referral to police
- internal investigation
- risk mitigation measures.

Parents or guardians will usually be informed of safeguarding concerns unless doing so may increase risk to the child (National Principle 3).

### **Concerning Behaviour or Violent Extremism**

If a participant expresses behaviours or comments suggesting potential exposure to violent extremism or serious risk behaviours:

- staff must document the concern
- escalate the concern to the CEO or Operations Manager
- management will assess whether external support or authorities should be consulted.

### **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 (National Principle 10).



## **Confidentiality**

All safeguarding reports are confidential.

Information will only be shared:

- on a need-to-know basis
- where required by law
- where necessary to protect a child's safety.

## **Outcomes**

Possible outcomes includes:

- Investigation by authorities
- Internal review
- Referral to support services
- Disciplinary action where appropriate
- No further action

## **Follow up**

Following a report:

- affected participants will be offered support services
- families may be contacted where appropriate, particularly in cases where a disclosure has occurred in a group setting
- staff or volunteers may receive debriefing or supervision.

## **REVIEW**

This policy will be reviewed every two years or earlier, if legislation changes, a safeguarding incident occurs, or improvements are identified through review (National Principle 9).

## **RELATED DOCUMENTS**

- Bullying Policy
- Crisis & Incident Management
- Our People Policy
- SunSmart Policy
- Record Keeping Policy
- Risk Management Policy
- Counselling Practice Manual

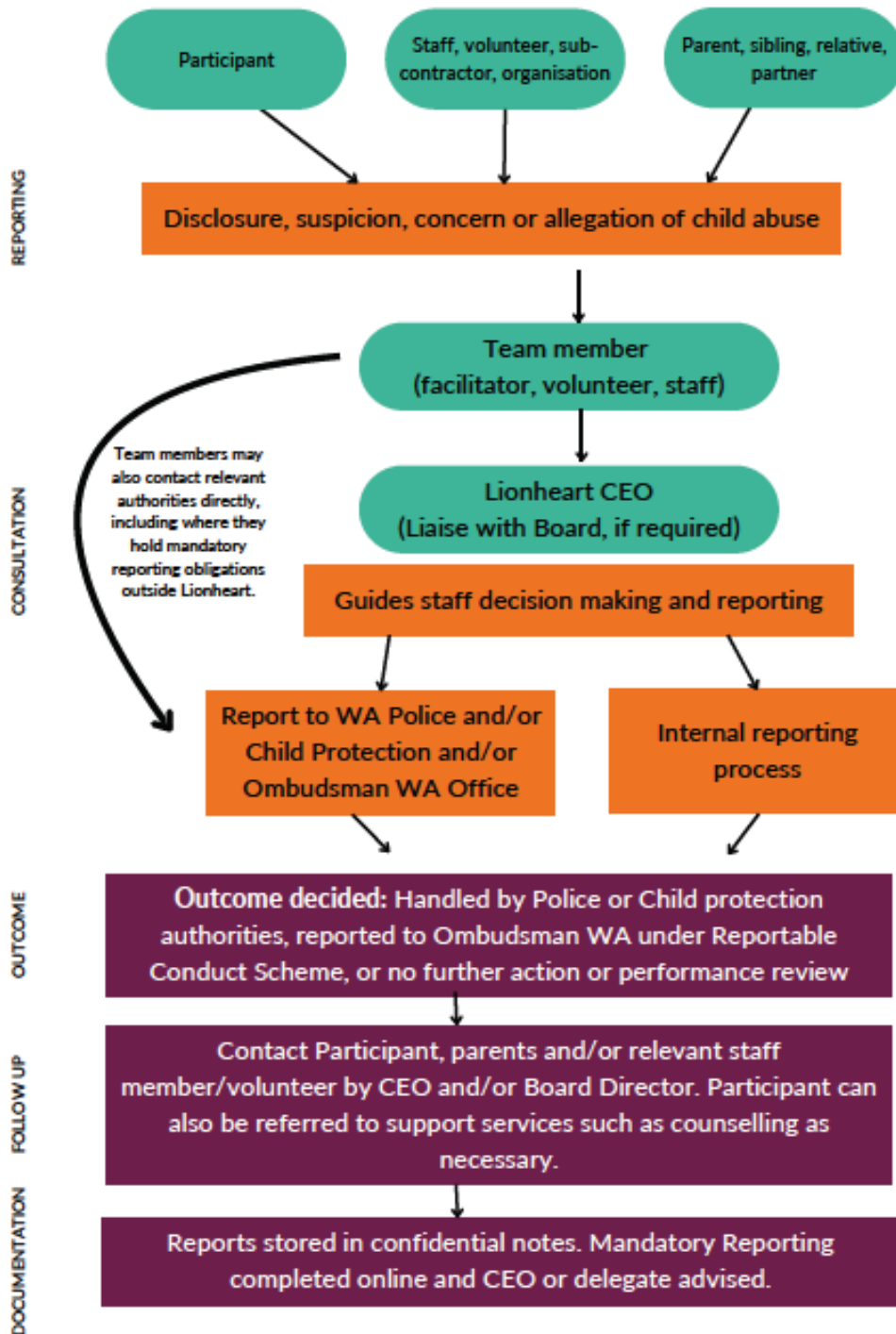
## REFERENCES

- Australian Childhood Foundation (2024). *Safeguarding Children – Foundational Knowledge*. [Watch and Learn - Australian Childhood Foundation Professionals](#)
- Australian Human Rights Commission – National Principles for Child Safe Organisations. <https://childsafe.humanrights.gov.au>
- 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 \(childabuseroyalcommission.gov.au\)](#)
- Children and Community Services Act 2004 (WA)
- 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 \(childabuseroyalcommission.gov.au\)](#)
- Ombudsman Western Australia – Reportable Conduct Scheme. <https://www.ombudsman.wa.gov.au>
- Working with Children (Criminal Record Checking) Act 2004 (WA)

## KEY CONTACT PERSON

For further information please contact the Operations Manager by emailing [enquiries@lionheartcampforkids.com.au](mailto:enquiries@lionheartcampforkids.com.au).

# LIONHEART REPORTING PROCESS





## APPENDIX 2

### Code of Conduct in relation to Child Safety

For all board members, employees, contractors and volunteers

#### **1. Culture of Safety and Respect**

We are a not-for-profit organisation supporting grieving children and their families. All board members, employees, contractors and volunteers must treat all children, young people and families with dignity, respect and fairness. All team members must:

- Act in the best interests of the child at all times
- Model respectful behaviour and positive relationships
- Contribute to a culture where children feel safe to speak up about concerns
- Take all safeguarding concerns seriously and report them according to policy.

Lionheart maintains zero tolerance for child abuse or harm (National Principles 1 and 2).

#### **2. Promotion of Equity, Inclusion and Diversity**

Lionheart is committed to providing inclusive and culturally safe environments for all children, young people, and families. Lionheart Team Members must promote equity and inclusion by:

- Treating all participants fairly and with respect
- Recognising and respecting cultural, religious and linguistic diversity
- Supporting the participation of children with disability or additional needs
- Promoting the cultural safety of Aboriginal and Torres Strait Islander children
- Ensuring communication and activities are inclusive and accessible wherever possible.

Discriminatory, exclusionary or prejudicial behaviour is not tolerated. Where barriers to participation are identified, personnel should raise these with Lionheart leadership so appropriate adjustments can be considered (National Principle 4).

#### **3. Positive Guidance**

Personnel must use respectful, age-appropriate strategies when guiding behaviour. Children should be supported to develop positive relationships, communication skills and emotional regulation. Lionheart team members must not use:

- Physical punishment
- Humiliating or degrading treatment
- Intimidation or threats
- Aggressive or hostile language.

Behaviour guidance must always prioritise the dignity and wellbeing of the child (National Principles 2 and 5).

#### **4. Sexual Misconduct**

Any form of sexual behaviour involving a child or young person participating in Lionheart programs is strictly prohibited. Sexual misconduct includes both contact and non-contact behaviour such as:

- Sexual touching or contact



- Sexualised language or comments
- Inappropriate digital communication
- Sharing or exposing children to sexual content.

Sexual relationships with current or former participants are not permitted.

All suspected sexual misconduct must be reported immediately in accordance with Lionheart safeguarding procedures.

### **5. Professional Boundaries**

All team members must maintain appropriate professional boundaries with participants. Team members must not:

- Engage in activities with children outside Lionheart programs without approval
- Provide services such as babysitting, mentoring or support outside Lionheart programs
- Transport participants without approval from Lionheart leadership
- Seek personal relationships with participants or their families.

Team members must avoid behaviour that could be interpreted as favouritism, grooming or boundary crossing (National Principle 5).

### **6. Gift Giving**

Team members must not provide personal gifts to individual children. Gift giving can create perceptions of favouritism or special relationships and should be avoided.

Group-based recognition or program-related items may be permitted where appropriate.

### **7. Communication and Language**

Team members must use language and tone that is respectful, supportive and appropriate to the age and development of participants. Team members must not use language that is:

- Discriminatory
- Threatening
- Humiliating
- Sexualised or inappropriate.

Communication should support children's confidence and sense of safety.

### **8. Photography and Media**

Photographs or recordings of children may only be taken by authorised Lionheart personnel, with written parental or guardian consent obtained before photographs or recordings are taken.

Team members must not:

- Use personal devices to photograph participants
- Store or share images of participants outside approved Lionheart systems
- Upload images of participants to personal social media accounts (National Principle 8).



### **9. Appropriate Physical Contact**

Physical contact must always be appropriate, respectful and necessary in the context of Lionheart programs. Appropriate physical contact may include:

- Providing reassurance to a distressed child
- Assisting a child where safety or wellbeing requires support
- Engaging with positive physical connection to reinforce rapport (i.e. high five)

Physical contact must never:

- Be sexualised or suggestive
- Involve force, intimidation or aggression
- Occur against the wishes of the child unless required to prevent immediate harm.

Where physical intervention is necessary to prevent injury:

- It must be used only as a last resort
- The level of force must be proportionate
- The incident must be reported to leadership as soon as practicable (National Principles 2 and 8).

### **10. Supervision**

Team members are responsible for actively supervising children during Lionheart programs and events. All team members must:

- Ensure children remain within sight or awareness of supervising adults
- Avoid unnecessary one-to-one situations with children
- Ensure activities occur in visible and appropriately supervised environments (National Principle 8).

### **11. Bathrooms and Change Areas**

Team members must balance supervision requirements with a child's right to privacy. All team members should:

- Avoid one-to-one situations in bathrooms or change areas
- Knock and identify themselves before entering
- Ensure appropriate supervision while respecting privacy.

Where assistance is required in circumstances of toileting accidents, parents or caregivers should be contacted to discuss their preferred appropriate to helping (i.e. adult coming to assist child themselves, child to change etc.).

### **12. Transport**

Team members must not transport children to or from Lionheart programs without approval from the CEO or Operations Manager and consent from a parent or guardian.

### **13. Social Media and Digital Communication**

Team members must not communicate with participants through personal social media accounts, text messaging or private digital communication. Official communication with participants must occur only through approved Lionheart channels.



Team members must not share photos, videos or personal information about participants online (National Principle 8).

#### **14. Confidentiality**

Team members must maintain the confidentiality of participants and families.

Sensitive information must not be shared unless:

- Required by law
- Necessary to protect the safety of a participant
- Authorised by Lionheart leadership.

All safeguarding concerns must be reported through the appropriate channels rather than discussed informally (National Principle 10).

#### **15. Speaking Up**

All team members have a responsibility to report behaviour that may place a child at risk. If something does not feel safe or appropriate, personnel must raise the concern with a Camp Leader, Program Facilitator or Lionheart leadership immediately.

Concerns raised in good faith will be taken seriously and addressed appropriately (National Principles 1 and 6).