



## Responding to Suspected Child Abuse Policy & Procedures

<b>Effective Date</b>	October 2014	
<b>Author/Owner</b>	Chief Executive Officer	
<b>Purpose</b>	To uphold and maintain the standards of and compliance with related Acts in all States and Territories.	
<b>Scope</b>	All Camp Quality employees, volunteers and involved persons	
	Associated Policies	1. Safeguarding Children & Young People Policy 2. Working with Children Check Policy 3. Code of Conduct 4. Family Code of Conduct 5. Privacy Policy
<b>Relevant Legislation</b>	See Annexure 3	
<b>Approval Date</b>	May 2021	
<b>Review Date</b>	May 2022	

### 1. Policy Statement

- 1.1 Camp Quality is committed to ensuring the safety and wellbeing of all children and young people who access our programs, services and events.
- 1.2 Camp Quality recognises that all children and young people have the right to develop and reach their potential in supportive and safe environments.
- 1.3 Camp Quality considers any form of child or young person abuse (including emotional, physical, sexual abuse or neglect) as intolerable under any circumstances. If proven, such actions constitute gross and wilful misconduct (a serious breach of Camp Quality's policies and procedures) which will result in termination of employment and / or prosecution.
- 1.4 Camp Quality has a legal and moral responsibility to protect children and young people from harm and to ensure any incidents of suspected child abuse are promptly and appropriately reported and dealt with through the relevant channels / authorities.
- 1.5 All children and young people within our organisation are informed of our policy and provided with the support and mechanisms to feel empowered to speak up if they feel unsafe, hear something, or see something that does not feel right. Our organisation upholds a child's rights to be heard, protected and supported.
- 1.6 In adhering to this policy, personnel of Camp Quality will promote equity and respect diversity of the children and young people and their parents/caregivers who access our services and programs and inform children and young people of their rights to feel and be safe. This includes Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children and young people with a disability, LGBTQIA+ children, and children who cannot live at home.
- 1.7 Our organisation upholds a family's right to have their concern resolved and done so in a culturally respectful and safe way.

## 2. Definitions (see also Annexure 1)

- 2.1 Child:** A person who is under the age of 12, 16 or 18 years as defined by relevant State or Territory legislation (see **Annexure 3**).
- 2.2 Young Person:** A person who is aged above 12 or 16 years but who is under the age of 18 years as defined by relevant State or Territory legislature (see Annexure 3).
- 2.3 Parent/Guardian and family members over 18 years:** Means a family member or legal guardian directly supporting a Camp Quality registered child or young person impacted by cancer.
- 2.4 Involved Persons:** Individuals who are not volunteers and employees delivering or attending Camp Quality services and programs.
- 2.5 Mandatory Reporter:** Individuals from assigned professions who are mandated / legislatively required to report certain types of child abuse directly to government authorities; examples of these professions include teachers, police and nurses (refer to **Annexure 2**).

## 3. Responsibilities

- 3.1** All personnel within our organisation have a duty of care, and at times a legal obligation, to ensure 'reasonable steps' are taken to prevent harm to children and young people. All personnel are responsible for supporting a transparent culture, whereby any actions by personnel that go against our Code of Conduct and Safeguarding Children and Young People Policy, however minor, are reported and documented.
- 3.2** If our personnel fail to report instances, allegations, disclosures or concerns in relation to abuse or neglect of a child or young person – by personnel within our organisation or by others – we view such failure as a serious matter that, depending on the circumstances, may result in disciplinary action or be grounds for dismissal. Failure to report incidents of abuse, neglect and harm of child or young person may be classed as a criminal offence under State/Territory laws.

### 3.3 Board of Directors

- 3.3.1** Responsible for ensuring appropriate policies and practices are in place to minimise the risk of child abuse and appropriately responding to suspected allegations.
- 3.3.2** Required to understand and act in line with Camp Quality's Safeguarding Children and Young People-related policies and the Code of Conduct; including reporting any suspected child abuse (whether the suspected perpetrator is within or outside of Camp Quality) to the Child Protection Officer.
- 3.3.3** Required to promote best practice in Safeguarding Children and Young People and promptly respond to any advice received from any State/Territory child protection authority or the Australian Childhood Foundation (ACF).
- 3.3.4** In conjunction with the Chief Executive Officer (CEO), are responsible for ensuring Safeguarding Children and Young People-related policies and practices are reviewed annually.

### 3.4 Chief Executive Officer (CEO)

- 3.4.1** Is accountable to the Board of Directors for ensuring that appropriate policies and practices are implemented, monitored, reported on and evaluated in a timely and diligent manner.
- 3.4.2** Review of Safeguarding Children and Young People-related policies and practices annually.
- 3.4.3** Is required to understand and act in line with Camp Quality's Safeguarding children and Young People-related policies and the Code of Conduct. Including reporting any suspected child abuse to the relevant State/Territory child protection authority (whether the suspected perpetrator is within or outside of Camp Quality).
- 3.4.4** Required to promote safeguarding children and promptly respond to any changes to legislation or advice received from any State/Territory child protection authority or the ACF and bring changes promptly to the attention of the Board.
- 3.4.5** Fully cooperate with all relevant State/Territory child protection authorities or other recognised bodies in their investigations of suspected child abuse.
- 3.4.6** Ensure that access to training and development and emotional support (access to an independent counsellor) is provided to employees and volunteers.
- 3.4.7** Manage inquiries, including the media, relating to suspected child abuse.

### 3.5 Child Protection Officers (CPO)

- 3.5.1** The Compliance Manager is Camp Quality's Child Protection Officer.
- 3.5.2** The CPO is required to understand and act in line with Camp Quality's Safeguarding Children and Young People-related policies, including reporting any suspected child abuse

to the relevant State/Territory child protection authority and/or police department.

**3.5.3** Fully cooperate with all relevant State/Territory child protection authorities or other recognised bodies in their investigations of suspected child abuse.

**3.5.4** Is required to ensure that the Camp Quality Safety and Child Protection Hotline (1800 CQ SAFE (1800 277 233) or cqsafe@campquality.org.au) is always answered.

### **3.6 Compliance Manager**

**3.6.1** Act in the role of CPO for Camp Quality.

**3.6.2** Promotes the safeguarding of children and promptly responds to any legislative changes or advice received from any State/Territory child protection authority, or the ACF and ensures that changes are promptly brought to the attention of the CEO.

**3.6.3** Ensures appropriate policies and practices are reviewed regularly and access to appropriate training and development is provided for all involved parties.

**3.6.4** Is a key collaborator in the development and updating of training, policies and procedures that are considered part of child safety.

**3.6.5** Directly liaises with State/Territory child protection authorities and other recognised bodies and assists in their investigations of suspected child abuse as required.

**3.6.6** Is the key contact for the ACF ensuring compliance auditing requirements are met.

**3.6.7** Investigates any suspected child abuse that involves a Camp Quality child or young person, employee, volunteer or involved parties.

**3.6.8** In conjunction with the General Manager – People & Culture, ensures employees and volunteers are recruited in line with the relevant Recruitment policies and all employees and volunteers have the required Working with Children or Police checks that are current and clear of any child related matters.

### **3.7 Employees and Volunteers**

**3.7.1** Are required to identify, report and respond to any concern about, or incidents of, child abuse or neglect towards children or young people to whom Camp Quality provides services and programs, including reporting any suspected child abuse to the relevant authorities and CPO as outlined in the attached Reporting Flow Chart.

**3.7.2** Must promote and act in line with Safeguarding Children and Young People policies and practices and immediately report any concerns with the policies or practices to the Compliance Manager.

**3.7.3** Are required to complete the relevant training as provided by Camp Quality and where identified, any additional external training required by State and Territory legislation.

**3.7.4** Managers are responsible for recruiting employees in line with Safeguarding Children and Young People-related policies and the Recruitment Policy.

**3.7.5** Employees are responsible for recruiting volunteers in line with Safeguarding Children and Young People-related policies, the Volunteer Recruitment Policy and Volunteer Recruitment Matrix.

### **3.8 Parents/Guardians and family members over 18 years**

**3.8.1** Are expected to understand and act in line with Camp Quality's Safeguarding Children and Young People-related policies and the Family Code of Conduct, including reporting any suspected child abuse to the Camp Quality's Safety and Child Protection Hotline (CQ Safe) or the CPO (whether the suspected perpetrator is within or outside Camp Quality).

**3.8.2** Are expected to promote Safeguarding Children and Young People policies and practices and report any concerns with the policies, practices or behaviour to a Camp Quality Staff member or Volunteer.

## **Policy, Practice and Procedures**

### **4. Responding to Suspected Child Abuse**

**4.1** If an employee, volunteer, parent or involved person has a reasonable belief or reasonable grounds to suspect a child is at risk of harm (whether the suspected perpetrator is within or external to Camp Quality they are required to immediately report this to Camp Quality's CQ Safe) and then follow the guidelines of the CPO.

**4.2** If the employee, volunteer, parent or involved person is a Mandatory Reporter they are legally required to make a report to the relevant government agency in their jurisdiction, as outlined in the Suspected Child Abuse Reporting Flow Chart (see Annexures 2 & 4).

**4.3** If a child or young person is at imminent risk of harm or in immediate danger, an employee, volunteer, parent or involved person is required to report the situation directly to the Police. However, to ensure the safety and welfare of all parties, Camp Quality also requires that the CPO is notified using the Safety and Child Protection Hotline (CQ Safe).

**4.4 Reasonable grounds to report:**

**4.4.1** If a child or young person discloses they have been abused.

**4.4.2** If someone else discloses, they know or believe a child/young person has been abused.

**4.4.3** There are physical signs of abuse.

**4.4.4** A child or young person displays behaviours that are of a sexual or violent nature either verbal or physical with no satisfactory explanation.

**4.5 Managing an allegation**

**4.5.1** Interim and immediate action will be taken to ensure the immediate safety of the child or children in danger or perceived to be in danger.

**4.5.2** The allegation is reported immediately to the CPO through Camp Quality's Safety and Child Protection Hotline and a Suspected Child Abuse Report Form is completed.

**4.5.3** Completing the Suspected Child Abuse Report Form:

- do not assess the validity of the allegations or concerns;
- disregard factors such as the authority or position of the persons involved;
- personal feelings and pre-existing views about the good character, or otherwise, of any person involved, or under investigation should not be considered or recorded on the report;
- record allegation on the Suspected Child Abuse Form and what was said, where possible, noting the exact words used by the person making the allegation with quotes and not abbreviations, or short form language;
- record observations, including any signs of behavioural or physical abuse; and
- date and sign all notes and observations.

**4.5.4** In situations where a child or young person is making an allegation, our personnel are required to:

- listen to the allegation or disclosure supportively, without dispute;
- clarify the basic details, without seeking detailed information or asking suggestive or leading questions;
- record on the Suspected Child Abuse Form what was said (where possible, noting the exact words used by the person making the allegation);
- explain to the child (if present) that other people may need to be told, in order to stop what is happening;
- provide reassurance immediate action will be taken in response to the allegation; and
- keep information confidential - only those people who must know should be informed of the disclosure.

**4.5.5** If the allegation is one of serious and wilful misconduct, against an employee, the employee may be redeployed or stood down from their role, pending investigation. During any period of suspension, the employee remains entitled to the terms of their employment contract, except the right to attend work to undertake work duties.

**4.5.6** If the allegation is one of serious and wilful misconduct, against a volunteer, the volunteer may be suspended from their role, pending investigation.

**4.5.7** The CPO will report the allegation to the relevant State/Territory child protection authority, police department and the ACF (see Annexure 3).

**4.5.8** The person making the report may also seek advice and/or report the allegation to the relevant State/Territory child protection authority or police department.

**4.5.9** The CPO will immediately notify the CEO and the General Manager – People & Culture.

**4.5.10** Irrespective of the outcome of a State/Territory child protection authority or police department investigation, if an internal investigation determines a breach of policy has occurred, for example, non-reporting of child safety disclosure, disciplinary action may be taken appropriate to the situation, including dismissal.

**4.6 Information gathering (completed by the CPO)**

**4.6.1** Review the Safeguarding Children Report, ensuring sufficient and relevant information was provided to assist in decision making, including details of the child or young person, the

indicators of harm, the child's whereabouts and family information.

- 4.6.2** Ensure witness interviews are adequately recorded and interview records are signed and dated.
- 4.6.3** In consultation with the CEO, review initial assessment and take action to address concern, including contacting and collaborating with appropriate family support, community health and government services and relevant child protection authorities and/or police if required.

#### **4.7 Procedural fairness**

- 4.7.1** After the initial stage of the investigation, the allegation will be put to the employee/volunteer during a fact-finding interview with the CPO and General Manager - People & Culture.
- 4.7.2** The employee/volunteer has the right to have an observer / support person present during the interview and to consult an advisor about the process.
- 4.7.3** The employee/volunteer will have an opportunity to respond during the interview and/or in a written submission.
- 4.7.4** All proceedings are subject to strict confidentiality and each party must maintain that confidentiality.

#### **4.8 Making a finding**

- 4.8.1** The organisation will consider all information gathered.
- 4.8.2** A finding as to whether the allegation is sustained or not sustained will be made.
- 4.8.3** The rationale for the finding must be clearly documented.
- 4.8.4** The panel making the decision comprising the Chief Executive Officer, the General Manager - People & Culture and the Compliance Manager, will be separate to the investigator.
- 4.8.5** A decision about what action to take will be made with disciplinary action or amendments to policy or procedures possible.

#### **4.9 Confidentiality**

- 4.9.1** As per the Privacy Policy, personal information relating to suspected child abuse is considered confidential and Camp Quality will only inform third parties as required by law, the relevant State/Territory child protection authority and the Police department.
- 4.9.2** Incident reports of suspected child abuse made to the Camp Quality Board and the ACF will include:
  - whether the allegation was made against an employee or volunteer (no names will be provided);
  - a summary of the instance; and
  - the status/outcome, including any disciplinary action taken.

#### **4.10 Documentation**

- 4.10.1** Suspected Child Abuse Reports and related investigations/documentation will be stored securely and with only CPOs to have access.

#### **4.11 Emotional Support**

- 4.11.1** Camp Quality will offer emotional support for any employee or volunteer through the 24-hour Employee Assistance counselling line via Access EAP. Other involved parties will be given the contact details of external counselling services they can access. Cultural safety will be considered: this includes any specific support for those from an Aboriginal and Torres Strait Islander community; Lesbian, Gay, Bisexual, Transgender or Intersex (LGBTI) persons, culturally and linguistically diverse persons, persons with a disability and those unable to live at home.

#### **4.12 Access to Policy**

- 4.12.1** The Board, employees and volunteers will be provided all Safeguarding Children and Young People-related policies on commencement of their role.
- 4.12.2** Parents will be provided the relevant Safeguarding Children and Young People information on commencement with Camp Quality, including the Family Code of Conduct.
- 4.12.3** All involved parties, including parents can request this policy, along with other Safeguarding Children and Young People-related policies at any time through the Child Protection Officers.
- 4.12.4** This policy is available on the Camp Quality's website.

## 5. Version History

Version	Description of changes	Author of changes	Effective date
2.6	Update policy to include feedback from the ACF.	Nadezna Wilkins	May 2021
2.5	Full review and update including legislation and reporting requirements.	Nadezna Wilkins	March 2021
2.4	Formatting fixed. Added Self harm to abuse definitions.	Vanessa Bullman	July 2020
2.3	A number of changes were made to align the policy to ACF standards. Clarity regarding NCIM role. Grooming added to abuse definitions.	Nedge Sinanovski	March 2018
2.2	Change of CEO	Vanessa Bullman	May 2017
2.1	Position-name change from Volunteer and Safeguarding Children Advisor to Volunteer and Recreation Program Senior Advisor.	Tegan Davies	May 2016
2.0	An involved person can make a report directly to the state/territory body or police department. Requirement to report to NSW Ombudsman any 'Reportable Conduct' by an employee or volunteer in NSW.	Tegan Davies	May 2015
1.0	New policy	Tegan Davies	October 2014

## Endorsement

Approved and endorsed by the Chief Executive Officer and Board of Camp Quality.

**Kim Jacobs**  
Chairman of Camp Quality Board

Signature:

Date: 25/06/2021

**Deborah Thomas**  
CEO

Signature:

Date: 25/06/2021

## Annexure 1

### Definitions

**Child abuse and neglect refers to any non-accidental behaviour by parents, caregivers, other adults** or older adolescents that is outside the norms of conduct and entails a substantial risk of causing physical or emotional harm to a child or young person. Child abuse can be categorised as physical, sexual, emotional, neglect and exposure to family violence. (definitions below are taken from [Child Family Community Australia](#)).

**Physical abuse** occurs when a person subjects a child or young person to non-accidental physically aggressive acts. The abuser may inflict an injury intentionally or inadvertently as a result of physical punishment or the aggressive treatment of a child. Physically abusive behaviour includes (but is not limited to) shoving, hitting, slapping, shaking, throwing, punching, biting, burning, excessive and physically harmful over training, and kicking. It also includes giving children harmful substances such as drugs, alcohol or poison. Certain types of punishment, whilst not causing injury can also be considered physical abuse if they place a child at risk of being hurt.

**Sexual abuse** occurs when an adult or a person of authority (e.g. older) involves a child or young person in any sexual activity. Perpetrators of sexual abuse take advantage of their power, authority or position over the child or young person for their own benefit. It can include making sexual comments to a child, engaging children to participate in sexual conversations over the internet or on social media, kissing, touching a child's genitals or breasts, oral sex or intercourse with a child. Encouraging a child to view pornographic magazines, websites and videos is also sexual abuse. Engaging children to participate in sexual conversations over the internet is also considered sexual abuse.

**Emotional or psychological** abuse occurs when a child or young person does not receive the love, affection or attention they need for healthy emotional, psychological and social development. Such abuse may involve repeated rejection or threats. Constant criticism, teasing, ignoring, threatening, yelling, scapegoating, ridicule and rejection or continual coldness are all examples of emotional abuse. These behaviours continue to an extent that results in significant damage to the child or young person's physical, intellectual or emotional wellbeing and development.

**Exposure to family violence** occurs when a child or a young person is forced to live with violence between adults in their home. It is harmful to children and young people. It can include witnessing violence or the consequences of violence. Family violence is defined as violence between members of a family or extended family or those fulfilling the role of family in a child or young person's life. Exposure to family violence places children and young people at increased risk of physical injury and harm and has a significant impact on their wellbeing and development.

**Grooming** is a term used to describe what happens when a perpetrator of abuse builds a relationship with a child with a view to abusing them at some stage. There is no set pattern in relation to the grooming of children. For some perpetrators, there will be a lengthy period of time before the abuse begins. The child may be given special attention and, what starts as an apparently normal display of affection, such as cuddling, can develop into sexual touching or masturbation and then into more serious sexual behaviour. Other perpetrators may draw a child in and abuse them relatively quickly. Some abusers do not groom children but abuse them without forming a relationship at all.

**Harm** to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by:

- physical, psychological or emotional abuse or neglect;
- sexual abuse or exploitation; and
- a single act, omission or circumstance; and a series or combination of acts, omissions or circumstances.

**Bullying** involves the inappropriate use of power by one or more persons over another less powerful person or group and is generally an act that is repeated over time. Bullying has been described by researchers as taking many forms which are often interrelated and include:

- Verbal (name calling, put downs, threats);
- Physical (hitting, punching, kicking, scratching, tripping, spitting);

- Social (ignoring, excluding, ostracising, alienating); and/or Psychological (spreading rumours, stalking, dirty looks, hiding or damaging possessions).

**Neglect** occurs when there is persistent failure or deliberate denial to provide the child with the necessities of life. Such neglect includes the failure to provide adequate food, clothing, shelter, adequate supervision, clean water, medical attention or supervision to the extent that the child's health and development is, or is likely to be, significantly harmed. Categories of neglect include physical neglect, medical neglect, abandonment or desertion, emotional neglect and educational neglect. The issue of neglect must be considered within the context of resources reasonably available.

**Danger to self / self-harm** also known as self-injury is defined as the intentional, direct injuring of body tissue done without the intent to commit suicide. Self-harm can also be used to describe a child/young person demonstrating suicidal behaviours. Danger to self and or others also extends to include a child/young person threatening to harm themselves or threatening to harm someone else.

## **Annexure 2**

### **State/Territory Reporting Contact Details**

<b>State/Territory</b>	<b>Reporting Authority</b>	<b>Contact Details</b>
ACT	Child and Youth Protection Services	General Public: 1300 556 729 (24 hours) Mandatory Reporters: 1300 556 728 (24 hours)
NSW	Department of Family & Community Services	Child Protection Hotline: 132 111 (24 hours)
NT	Territory Families	Child Abuse Hotline: 1800 700 250 (24 hours)
QLD	Dept of Child Safety, Youth and Women	Brisbane: 1300 682 254 Central Queensland: 1300 703 762 Far North Queensland: 1300 684 062 Ipswich: 1800 316 855 North Queensland: 1300 706 147 South East: 1300 679 849 South West (Darling Downs): 1300 683 390 After Hours: 1800 177 135
SA	Department of Child Protection	Child Abuse Report Line: 13 14 78 (24 hours)
Tasmania	Department of Health and Human Services	Child Safety Service: 1800 000 123 (24 hours)
Victoria	Department of Health and Human Services	North Division Intake: 1300 664 977 South Division Intake: 1300 655 795 East Division Intake: 1300 360 391 West Division Intake – Regional: 1800 075 599 West Division Intake – Metro: 1300 664 977 After Hours: 13 12 78
WA	Department of Communities, Child Protection and Family Support	Central Intake Team: 1800 273 889 After Hours: 18800 199 008

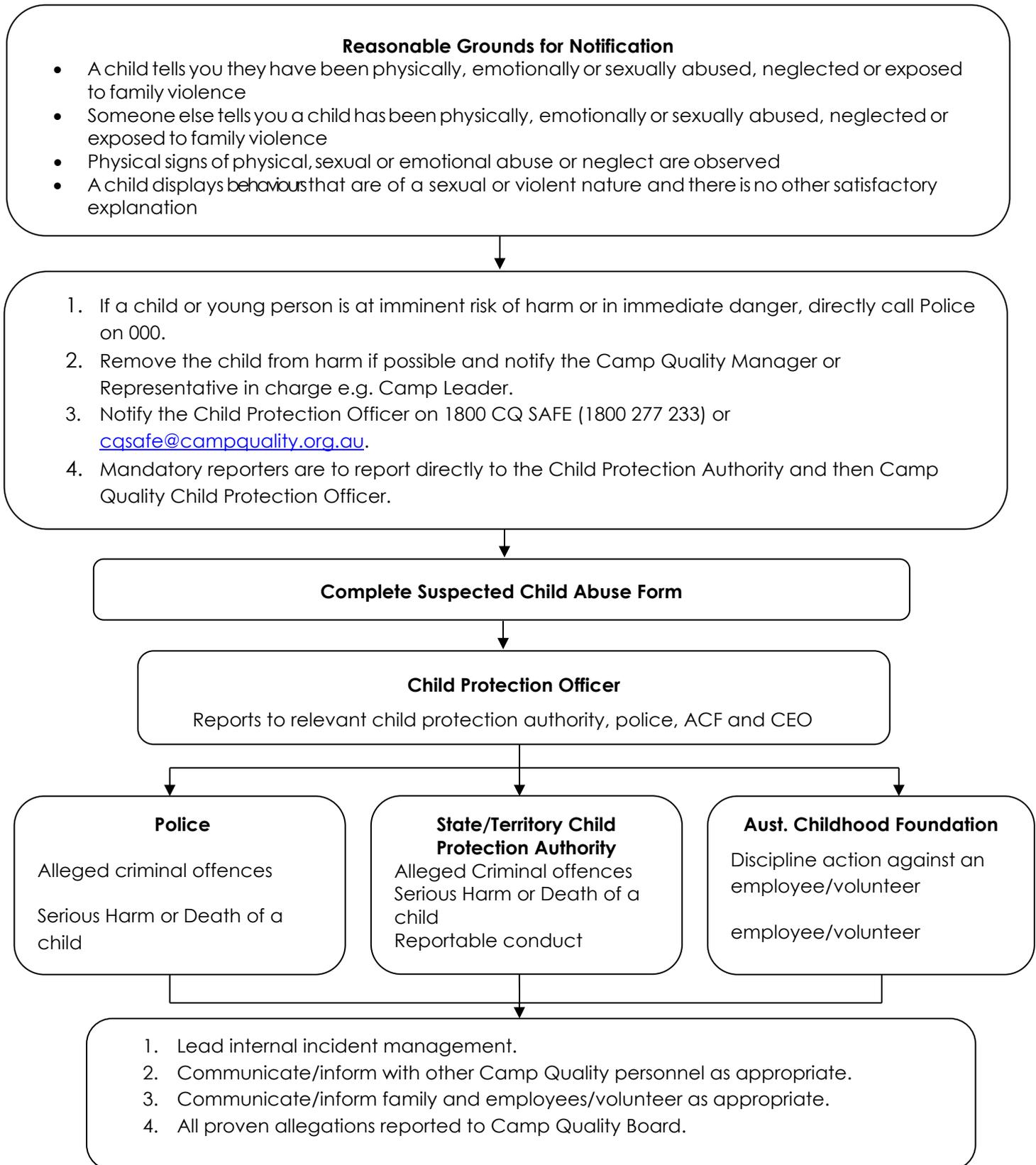
## Annexure 3

### Legal Reporting Obligations Summary – legal reporting requirements that apply to Camp Quality

Reporting Legislation and Summary	Relevant CQ People who must comply
<p><b>Mandatory Reporting</b></p> <p>VIC - <i>Children, Youth &amp; Families Act 2005 (Vic) ss 182(1), 184 &amp; 162(c)-(d) Crimes Act 1958 (Vic)s 327</i></p> <hr/> <p>TAS - <i>Children, Young Persons and their Families Act 1997 (Tas) ss 3, 4 &amp; 14</i></p> <hr/> <p>QLD - <i>Child Protection Act 1999 (Qld) pt1AA, ss 13E&amp;13F</i></p> <hr/> <p>NT - <i>Care &amp; Protection of Children Act 2007 (NT) ss 15, 16 &amp; 26</i></p> <hr/> <p>NSW - <i>Children &amp; Young Persons (Care &amp; Protection) Act 1998 (NSW) ss 23 &amp; 27</i></p> <hr/> <p>ACT - <i>Children &amp; Young People Act 2008 (ACT) s 356</i></p> <hr/> <p>SA - <i>Children and Young People (Safety) Act 2017 (SA) Chapter 5 s 30-s 31</i></p> <hr/> <p>WA - <i>Children and Community Services Act 2004 (WA) Division 9A, s 124A to s 124H,</i></p>	<p>Child Protection Officers</p> <p>All jurisdictions in Australia have child abuse mandatory reporting legislation.</p> <p>All jurisdictions require a reasonable belief or suspicion that a child is at risk of harm to trigger a mandatory report.</p>
<p><b>Reportable Conduct</b></p> <p>NSW - NSW Office of the Children's Guardian</p> <hr/> <p>VIC - <i>Children Legislation Amendment (Reportable Conduct) Act 2017 (Vic)</i></p> <hr/> <p>ACT - <i>ACT - Reportable Conduct and Information Sharing Legislation Amendment Act 2016 (ACT)</i></p> <p>All three Reportable Conduct Scheme legislations require employment-related child protection matters to be reported including employed volunteers and unpaid staff members.</p>	<p>Camp Quality and its services/personnel in NSW, VIC and ACT</p>
<p><b>Failure to Protect and Failure to Disclose</b></p> <p>VIC, TAS, QLD, NSW &amp; ACT,            In response to recommendations made by the <i>Royal Commission into Institutional Responses to Child Sexual Abuse</i>, adults who reasonably believe that a sexual offence has been committed against a child, must make a report to police. Failure to make a report is an offence.</p>	<p>All Camp Quality staff and volunteers in VIC, TAS, QLD, NSW &amp; ACT</p>

## Annexure 4

### Suspected Child Abuse Reporting Flowchart



If an employee, volunteer, parent or involved person has reasonable grounds to suspect a child is at risk of harm (whether the suspected perpetrator is within or external to Camp Quality) they are required to immediately report this to Camp Quality's Safety and Child Protection Hotline. If the employee, volunteer, parent or involved person is a Mandatory Reporter they are also legally required to make a report to the relevant government agency in their jurisdiction.