

Operational Policy
OP018-V1.10Revision Date: 4th May 2026

This policy supports reg 168 (2) (h) providing a child safe environment, including matters relating to the promotion of a culture of child safety and wellbeing within the service

POLICY

At Camp Australia, we are a child safe organisation. We put children first, and their safety, rights and wellbeing guide everything we do to help keep children safe from harm. We are continually improving our policies and practices based on findings from child safety reviews both internally and externally as we strive to deliver service excellence every day, every session. Children come first at our service, and their safety, rights and wellbeing guide all decisions and practices.

This Child Safe policy has been created in collaboration with our families, our educators, Camp Australia (CA) operations staff and CA management. It is based on the National Principles for Child Safe Organisations, the Universal Principle and the requirements of the child safe frameworks for each of the states and territories in which our services operate. CA has Our Child Safe Framework guide detailing how we meet each state and territory child safe standards.

This child safe policy will demonstrate the strong commitment CA has in creating a culture to ensure safeguarding practices are followed so all employees of CA and our visitors and agency staff are aware of their responsibilities regarding child safety, including the need to identify and respond to every child at risk of abuse and neglect.

By creating a child inclusive environment, children who come to our services are safe and feel respected, and valued regardless of their background, ethnicity, culture, language, beliefs, age, gender, socioeconomic status, ability, additional requirements or family structure.

This policy is supported by many other CA policies on how we provide a quality service that is child safe. The Child Safe policy is shared with contractors, visitors at sign in, taught to all staff in compulsory CA Child Protection Training and families can access it on our web site. It is also located in the National Operations Policy Manual for all Camp Australia staff, parents and carers to read. This policy will be reviewed as part of our continuous improvement strategy when required but no longer than 2 years.

It is recommended all records relating to child safe issues are to be kept for 45 years for reference if required.

STATEMENT OF COMMITMENT

CA's risk management strategy is to keep children safe and promote their wellbeing by delivering enriching childhood experiences and guiding children's growth.

Camp Australia:

- is committed to child safety and children's best interests
- has zero tolerance for harm to children and will take all allegations of reportable conduct and safety concerns very seriously, ensuring such conduct is dealt with in accordance with state laws
- will uphold the dignity and rights of all children attending our services to feel safe and protected
- is committed to providing a quality service play environment that is child safe to prevent harm and ensure children are happy and comfortable

- is committed to promoting the wellbeing of all children by embedding child-focused principles into our policies and practices
- has practices in place to ensure our children go home with the correct parent or carer
- is committed to preventing child harm by identifying risk, including risk of abuse and neglect, and responding early to removing or reduce these risks
- has legal and moral obligations to contact authorities when there are concerns about a child's safety, which will be followed rigorously
- has robust People and Culture recruitment practices for all educators and staff
- is committed to providing training and coaching to all educators and management on the risks to children
- is committed to promoting cultural safety for Aboriginal and Torres Strait Islander children, cultural safety for children from culturally and/or linguistically diverse backgrounds, and to providing a safe environment for children with additional requirements
- considers the needs of same sex attracted and intersex children and recognises gender diversity in providing a safe environment

Camp Australia requires all educators and management to uphold these commitments. The organisation has specific policies, procedures and training in place that supports the CA leadership team to achieve these commitments.

STRATEGIES

Our Children

Our educators program activities and are trained in positive relations, refer to CA's Positive Relations policy that will help our children to learn and grow into who they want to be. Educators use the CA Developing Your Service Charter of Commitment to Children Tool to create the Charter of Commitment to Children's Safety on display on the service signage board where child safeguarding policy concepts and practices are discussed with the children. Child safe policies and practices are also discussed during session of care and during child protection week.

Our sessions of care -

- Teach communication strategies which empower children to speak up when they are feeling uncomfortable or vulnerable
- Empower children by involving them in decisions, especially when it involves them
- Involve educators listening to children's views and respecting what they have to say
- Recognise and promote diversity and inclusivity and welcome all people from all walks of life and cultural backgrounds (Diversity and Inclusion and Supporting Children with Additional Needs policies). Programming includes the aboriginal 8 ways for learning.
- Encourage feedback from children in many ways such as group discussion and suggestion boxes children's feedback is also supported by the process in the Children's Comments and Feedback policy and the Children's Grievances and Complaints policy
- Promote child safety and wellbeing and reduce the risk of harm
- Keep children safe online by our educator's supervision practices and following the Safe Use of Digital Technologies and Online Environments policy, Personal Electronic Devices policy and the Taking and Sharing Photos or Video/Images policy

Our Families

Families are offered several ways they can provide feedback on any aspect of our service delivery by talking to their service educators, regional managers, or our Customer Care team. Parents are also sent surveys inviting feedback as various times throughout the year. Parents can give feedback via email when using their parent portal. Family feedback is supported by the Family Grievances and Complaints Procedure policy. Our educators are supportive, they understand children and are aware of the challenges associated with parenting. Educators will provide in-service support and access to relevant information to make parenting easier.

Where a child may have a medical condition, parents are involved in creating a risk minimisation and communication plan with the service leader. Where a child may have other additional requirements, our educators will instigate the CA CARE Program. The educator in collaboration with an Inclusion Support Professional will assess the needs of the service to support the child and may recommend additional resources and/or an Inclusion Support Educator.

Our regional managers and general managers will provide support to affected members of staff, families and the school community where a child safe issue has occurred.

Our Educators

Children are at the centre of everything we do. At CA, we guide children's growth by employing passionate, talented, and dedicated educators who are suitable (Working With Children policy and Recruitment policy). Educators are trained and supported to implement child safeguarding and wellbeing practices by CA's service delivery team.

Our educators are equipped with the knowledge, skills and awareness to keep children safe; all our staff complete compulsory child protection training and sign a People and Culture Code of Conduct. Where state-based child protection training is mandatory, CA will track educators through their staff record and employee file to ensure the training has been completed by the approved registered training organisation in the relevant state.

The safety and well-being of children is our primary concern; however, we also value and provide for the safety and wellbeing of all team members. Our educators are trained on how to identify and minimise risks of harm to children (refer to the child abuse definition below and the CA Grooming Behaviours policy) and to detect potential signs of child harm. All educators will uphold children's privacy unless there is a risk to a child's safety or information has been requested by relevant authorised people. A Keeping Children Safe poster to be displayed in services reminding educators what they need to do if they suspect a child is at risk of harm.

New educators and team members will be inducted into the service and supervised during site visits and supported by their nominated supervisor and other educators to ensure they uphold the quality practices CA has in relation to reducing harm to children and keeping children safe.

Our regional managers and general managers act as a point of contact and support for children, parents and educators with regards to child safety issues. They will support staff to take any necessary action in alignment with state and territory based statutory reporting requirements.

Our regional managers and general managers are responsible for reviewing CA's processes and procedures for responding to allegations or disclosures.

CA is deeply committed to its legal and ethical responsibilities in protecting children, with robust child safeguarding practices that ensure timely action when a child is identified as at risk of harm. All staff are expected to actively uphold our risk management strategies, which are designed to identify, assess, and minimise potential harm. Allegations are treated with the utmost seriousness, and CA has clear, responsive processes in place to conduct thorough and timely investigations.

Reporting Requirements

Every educator and CA team member has a responsibility to protect the health, safety, welfare and wellbeing of children. Our educators have regular and frequent direct contact with children therefore they are uniquely positioned to observe, and report concerns regarding harm or risk of harm to children.

Camp Australia adheres to all reporting requirements which are relevant in each state and territory as listed the Child Protection Reporting Requirements policy. All CA team members are required to report safety concerns when there is reasonable suspicion that a child has been harmed or is at risk of harm caused by physical abuse, emotional abuse, sexual abuse, neglect, or domestic violence.

Educators are provided with additional Child Protection Training to support their understanding of requirements to meet these individual reporting obligations under the following schemes:

- **Reporting to child protection** – for all CA team members report to the relevant child protection authority on any reasonable suspicion that a child has suffered, is suffering, or is at risk of suffering, harm caused by any forms of abuse or neglect. In VIC, NSW, ACT, WA and SA it is mandated for our educators and some of our management team to report to child protection - refer to CA's Child Protection Reporting Requirements policy.
- **Reporting sexual abuse of children to the police** – for educators in every state to the local police where sexual abuse (and in Qld sexual offending) against children may occur, is occurring or has occurred.
- **Reporting to the Regulatory Authority** – the approved provider, Camp Australia, must notify the regulatory authority for incidents where child abuse or neglect has occurred, is occurring or suspects maybe occurring while a child is attending a session of care (CA's Serious or Fatal Incident policy). The timeframe to notify the regulatory authority of any incidents or allegations of physical or sexual abuse to a child while being educated or cared for is 24 hours.
- **Reportable Conduct Scheme** – for educators in VIC, ACT, NSW and WA for the prevention, identification and handling of allegations of child abuse and neglect made against educators. All appropriate department and government agencies will be advised of reportable allegations as per each state requirement (CA's Reportable Conduct policy).

Educators must comply with these requirements and support any additional requests for information from any external agency, including in applicable states where there is the information sharing scheme. Refer to CA's Information Sharing for Child Wellbeing policy on SharePoint.

Definitions of Abuse or Harm

Child abuse and neglect describe actions that endanger children's physical and/or emotional health. Child abuse usually involves a pattern of behaviour that takes place over a period of time, but child abuse can also occur as a single incident. Child abuse and neglect are usually categorised as follows:

Physical abuse

Emotional or psychological (mental) abuse

Sexual abuse or other exploitation of the child, including incest

Neglect

Exposure to domestic violence

Bullying

Physical Abuse

Physical abuse describes when a child suffers or is likely to suffer significant harm from a non-accidental injury or injuries inflicted by another person. This may be from a single or repeated physical act such as hitting, smacking, punching, shaking, kicking, burning, scalding or restraining. Physical abuse includes the use of weapons (such as belts and paddles) or administering poison or harmful substances.

Possible physical indicators:

- Unexplained bruises/burns/cuts/welts

- Sprains or fractured bones

- Unconsciousness

Possible behavioural indicators:

- Showing wariness or distrust of adults

- Wearing long sleeved clothes on hot days (to hide bruising or other injury)

- Fear of specific people

- Startles or flinches at sudden movement

- Overly compliant, withdrawn, uncommunicative or aggressive, destructive or disruptive

- Unexplained absences

- The position, nature or extent of the injury does not correspond with the explanation of the injury (e.g. bruising on inner arms or legs) or the explanation changes

- Excessive accidents resulting in injury

- Patterned bruising e.g. hand marks or finger marks from roughly grabbing

- Untreated injuries

- Learning difficulties

- Regression in development

Emotional or psychological (mental) abuse

Emotional abuse occurs when a child is deprived of care and attention, is subject to yelling or bullying, or is ridiculed, threatened, ignored or scared in a way that affects their confidence, self-esteem and emotional wellbeing.

Possible physical indicators:

- Delays in emotional, mental, or even physical development

- Physical signs of self-harming

- Loss of self-confidence or self-esteem

- Social withdrawal or a loss of interest or enthusiasm

- Parents/carers have a negative attitude towards the child or show little interest in the child's interests or activities

Possible behavioural indicators:

- Exhibiting low self-esteem
- Exhibiting high anxiety
- Displaying aggressive or demanding behaviour
- Being withdrawn, passive and/or tearful
- Self-harming

Sexual Abuse or Other Exploitation of the Child

Sexual abuse occurs when an adult, a more powerful child or an adolescent exposes a child to sexual activity. Sexual abuse can involve inappropriate touching/kissing, involving a child in a sexual act; exhibitionism, and sexually suggestive comments and behaviour.

Deliberately exposing children to sexually explicit or pornographic material through magazines, videos, computer images or music is also a form of sexual abuse.

Possible physical indicators:

- Presence of sexually transmitted diseases
- Pregnancy
- Bleeding, swelling or redness around the vagina, anus or mouth
- Blood on underwear or complaints of soreness

Possible behavioural indicators:

- Displaying sexual behaviour or knowledge that is unusual for the child's age
- Acting out sexually
- Inappropriate sexual play and behaviour with toys, animals or other children
- Sexual themes in drawings or writings
- Difficulty sleeping
- Being withdrawn
- Complaining of headaches or stomach pains
- Fear of specific people
- Showing wariness or distrust of adults
- Displaying aggressive behaviour
- Regression in development
- Wetting or soiling themselves
- Avoids physical contact or overly affectionate

Neglect

Neglect occurs when the basic needs of the child are not met. This includes failing to provide adequate nutrition, clothing, medical attention, education, shelter and safe living conditions.

Possible physical indicators:

No food in child's lunch box and/or frequently hungry

Signs of malnutrition (e.g. excessively skinny)

Inappropriate or dirty clothing

Unexplained sores or rashes

Frequent cases of head lice or illness

Excessively tired

Poor hygiene

High absences

Possible behavioural indicators:

Stealing food or other items

Staying at school outside of school hours

Aggressive or withdrawn behaviour

Misusing alcohol or drugs

Socially rejected or isolated

Developmental or learning delays

Exposure to domestic violence

Exposure to domestic violence can cause both physical and emotional harm to children. Children do not have to be involved in or witness the violence to be affected by it.

Possible physical indicators:

Aggressive or violent behaviour

Poor concentration

Disturbed sleep, nightmares

Possible behavioural indicators:

Fear of specific people

High levels of anxiety

Low self-esteem

Being extremely apologetic and meek.

Depression

Bullying

A person is bullied when they are deliberately and repeatedly physically or emotionally hurt by a more powerful person or group of people. Bullying can involve name calling or teasing, verbal threats and rumours, or deliberately excluding a child from an activity. Bullying may also involve the child being hit or pushed around by another child or group of children or the child's property being taken away or damaged.

Possible physical indicators:

Unexplained bruises/cuts/welts

Frequent headaches or stomach aches, feeling sick or faking illness

Change in eating habits, e.g. suddenly not wanting to eat on a regular basis or binge eating

Lost or destroyed clothing, books etc.

Possible behavioural indicators:

Fear of specific people

Exhibiting low self-esteem

Exhibiting high anxiety

Displaying aggressive or demanding behaviour

Being withdrawn, passive and/or tearful

Grooming Behaviour

Grooming is the process by which sexual predators groom children, and protective people in the community, such as parents, carers and educators to gain trust to be able to access a child without causing suspicion. Our educators are to refer to the Grooming policy to help identify this behaviour and protect children from predators.

CA Team Members Awareness of child safeguarding practices:

- All CA team members are to complete compulsory CA child protection training. In some states and territories, there is also external compulsory child protection training.
- CA team members must be aware of their state or territory legal responsibilities for preventing risk of harm to children.
- CA team members should be aware of indicators of risk to children such as -physical abuse, emotional abuse, sexual abuse, neglect, domestic violence and bullying.
- When a team member suspects a child may be at risk of harm, they are to follow their state or territory's legal reporting requirements. Refer to CA's Child Protection Reporting Requirements policy.
- Team members should monitor their own behaviour and environment to create an environment that provides little opportunity for infiltration.
- Team members must report any behaviour witnessed that may be considered as grooming following **PN084 Reporting a Child Safety Concern**. Refer to CA's Grooming Behaviour policy.

In the event of a suspicion or if the parent/carer/adult discloses information:

If an adult discloses an incident of abuse to an educator:

- Follow **PN084 Reporting a Child Safety Concern** and call **000** if a child is in immediate danger
- The educator must advise the adult that you will take notes during their discussion to capture all details.
- The educator must explain to the adult that this information will need to be repeated to the state child protection agency, the regulatory authority, the police (where necessary) and the regional manager and general manager.
- It is important that the educator does not make any promises at this early stage and advise them that they will do their best to keep the child safe.
- Provide the adult access to the digital **Incident, Injury, Trauma and Illness** form they can complete the form or write it together.
- Ask them what action they would like the educator to take and advise them of what the next steps will be – seek advice from your regional manager if required.
- When an educator suspects a child may be at risk of harm, they are to follow their state or territory's legal reporting requirements. Educators can use this form **FM029 Child Protection Report Form** to collect information. Refer to CA's Child Protection Reporting Requirements policy. All documentation identifying suspected harm or risk of harm to a child must be given/forwarded to the regional manager and stored in a secure and confidential manner.
- Educators must ensure that the content of the documentation remains confidential and that only the educators dealing directly with the child and the regional manager are across the events and the report. Under no circumstances will the suspicion be discussed outside of the service or anyone who is not directly involved.
- All reports will remain confidential within the Child Protection Authority. However, if the report becomes the subject of a protection application, the educator/s may be required to give evidence to the court.
- Educators must be aware that some people and children from culturally and/or linguistically diverse backgrounds may face some barriers when reporting any allegations of child abuse.
- Where an allegation may involve an aboriginal child, the child/parent may need a culturally appropriate representative. The educator should advise their regional manager who will engage the parent/carer with a local aboriginal community group.
- If a situation arises where the regional manager is not immediately available to talk this through, then the educators must speak with another member of the operations team or People and Culture.
- As a professional courtesy to the principal of the school and to make the school aware of the child's situation, the regional manager may inform the principal that a report has been made. As reports of abuse are confidential this will be at the discretion of the general manager.
- All suspicions, whether reported or not, must be documented as these suspicions may later be used as evidence by the investigating agencies.
- Each educator has different legal responsibilities with child protection training and reporting.

In the event of a suspicion or if the child discloses information:

In accordance with Regulation 168(o), the service will maintain a child-focused complaints handling process. Educators are required to follow this process and promptly report, document, and manage all complaints, including those alleging that a child is exhibiting harmful sexual behaviour.

If a child discloses an incident of abuse to an Educator:

- Follow **PN084 Reporting a Child Safety Concern** and call **000** if a child is in immediate danger
- The educator must try and separate the child and themselves from the other children discreetly and listen to them carefully.
- It is important to let the child use their own words to explain what has occurred.
- The educator must ensure questions are open ended – do not ask questions that may be leading.

- The educator must explain to the child that this information may need to be shared with others such as someone at Camp Australia, the police or where appropriate, their parents.
- It is important that the educator does not make promises to the child but explain they will do their best to keep them safe.
- Reassure the child that it was right to tell an adult.
- The educator should stay with the child if they seem at ease with your company as they are likely to be in a distressed state.
- As soon as possible after the disclosure, where an educator has reasonable grounds to believe that a child is at risk of harm report to the relevant authority, follow the Child Protection Reporting Requirements policy and report the disclosure to the regional manager who will assist with the next steps. An educator can make a report directly to their state or territory child protection authority or seek advice from their regional manager (or another regional manager if theirs is not available or contact People and Culture).
- Educators must be aware that some children from culturally and/or linguistically diverse backgrounds may face some barriers when disclosing and are to support them – seek advice from your regional manager.
- Where an allegation may involve an Aboriginal child, the service may need a culturally appropriate representative. The educator must advise the regional manager about who will engage with the parent/carer and the local aboriginal community group.
- Children with a disability may experience some barriers when disclosing an incident, the educator can seek advice from their regional manager.
- All documentation identifying suspected abuse must be forwarded to the regional manager and stored in a safe, secure, and confidential manner.
- Educators must ensure that the content of the documentation remains confidential and that only the educators dealing directly with the child and the regional manager are aware of the events and the report. Under no circumstances will the suspicion be discussed outside of the service or anyone who is not directly involved.
- All reports will remain confidential within the Child Protection Authority. However, if the report becomes the subject of a protection application, the educator/s may be required to give evidence to the court.
- Each educator has different legal responsibilities with Child Protection Training and Reporting. Educators must be familiar with and comply with the legal responsibility for child protection as per state requirements, for further information refer to the organisation for child protection web sites as listed in the table below:

State Organisations for Child Protection

State	Organisation for Child protection	Contact
Australian Capital Territory (ACT)	Child and Youth Protection Services (CYPS)	www.communityservices.act.gov.au www.ombudsman.act.gov.au Phone: General public Ph: 1300 556 729 (24 hours) Mandated reporters Ph: 1300 556 728 (24 hours)

		<p>Online: For less serious concerns, complete an online Child Concern Report.</p> <p>Email: For less serious concerns: childprotection@act.gov.au</p>
New South Wales (NSW)	Department of Communities and Justice	<p>https://www.facs.nsw.gov.au/families/Protecting-kids/reporting-child-at-risk</p> <p>Phone: Child Protection Helpline Ph: 13 21 11 (24 hours) (TTY/voice calls: 133 677; Speak & Listen: 1300 555 727; SMS: 0423 677 767)</p> <p>Online: Mandatory reporters with less serious concerns can use eReporting.</p>
Northern Territory (NT)	Territory Families, Housing and Communities The Department of Children and Families	<p>https://nt.gov.au/community/child-protection-and-care</p> <p>Phone: Child Abuse Hotline Ph: 1800 700 250 (24 hours)</p>
Queensland (QLD)	Child Safety Department of Child Safety, Seniors and Disability Services	<p>https://www.qld.gov.au/community/getting-support-health-social-issue/support-victims-abuse/child-abuse</p> <p>Phone: For a list of contact numbers during business hours, go to: Regional Intake Services.</p> <p>Child Safety After Hours Service Centre Ph: 1800 177 135 or (07) 3235 9999.</p>
South Australia (SA)	The Department for Child Protection	<p>www.childprotection.sa.gov.au</p> <p>Phone: Child Abuse Report Line (CARL) Ph: 13 14 78 (24 hours)</p> <p>Online: Less serious concerns can also be reported online.</p>
Victoria (VIC)	Department of Families, Fairness and Housing	<p>https://services.dffh.vic.gov.au/child-protection</p> <p>Phone: For a list of regional and metropolitan phone numbers: Child Protection Contacts</p> <p>After hours child protection emergency service Ph: 13 12 78</p>
Western Australia (WA)	Department of Communities	<p>www.dcp.wa.gov.au</p> <p>Reporting related to sexual abuse</p> <p>Online: Mandatory reporters must make a written report via the Mandatory Reporting Web System https://mandatoryreportingweb.communities.wa.gov.au/</p> <p>Phone: Department of Communities Mandatory Reporting Service support line can be accessed to seek advice.</p>

		Ph: 1800 708 704 <u>Reporting related to all abuse types with the exception of sexual abuse.</u> Phone: Central Intake Team Ph: 1800 273 889 After hours Ph: (08) 9223 1111 or Country Freecall: 1800 199 008
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External Information References:	
Education and Care Services National Law 2010	Section 2A Paramount Consideration – safety rights and best interests of children Sections 162A, 166, 167
Education and Care Services National Regulations	Regulations 84 Regulations 175 (2) (d), (e) Regulation 168 (2)(h)
My Time Our Place Framework for School Age Care in Australia	Outcome 1-5
National Quality Framework	NQF Child Safe Culture Guide QA2, QA4, QA7
Victoria	Children, Youth and Families Act 2005 Crimes Amendment (Grooming) Act 2014 Child Wellbeing and Safety Act 2005
New South Wales	Children and Young Persons Act 1998 Children's Guardian Act 2019
ACT	Children and Young People Act 2008 Ombudsman Act 1989
Queensland	Child Protection Act 1999 Universal Principle
Northern Territory	Care and Protection of Children Act 2007
Western Australia	Children and Community Services Act 2004
South Australia	Children and Young People (Safety) Act 2017 Child Safety (Prohibited Persons) Act 2016
National Child Safety Standards	