



# Warrambui – Safeguarding Children, Young and Vulnerable People Policy

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Next Review: October 2025  
Approved by: Board

## **Introduction:**

Warrambui is a not-for-profit organisation, a ministry of the Lutheran Church of Australia, NSW and ACT District; providing fully catered accommodation services, and programs to the community including children, young and vulnerable people.

Our mission is to impact the lives of people through the power of the Holy Spirit, by being a loving, vibrant, servanthood community growing with the heart of Jesus. Led by the Warrambui Board and Centre Director, we express this heart of Jesus through our commitment to safeguarding children, young and vulnerable people.

Developed to protect children, young and vulnerable people visiting, staying or residing at Warrambui's site, the Safeguarding Children, Young and Vulnerable People Policy has been formally approved and endorsed by Warrambui's Board.

## **Aim:**

The aim of this Safeguarding Children and Vulnerable People Policy is to outline the responsibilities, procedures and practices required by all Personnel within Warrambui in relation to keeping children, young, and vulnerable people free from abuse and neglect.

This Policy is critical in regards to Warrambui's accreditation under the Australian Childhood Foundation's Safeguarding Children Program. As part of that accreditation, Warrambui adheres to this Policy to ensure appropriate protection of children, young and vulnerable people in our care.

## **Scope:**

The Safeguarding Children and Vulnerable People Policy applies to all Personnel, including staff, Board members, volunteers and contractors involved with Warrambui.

This Policy applies in all our operational environments (physical and online) and without fail wherever children, young or vulnerable people are participating in our organisation's programs, services or facilities.

## **Referenced Documentation**

Safeguarding Code of Conduct

Responding to Child, Young and Vulnerable Persons Abuse Reports and Allegations Policy

Staff HR and Employment Policy

Child and Young People Friendly Statements about Safeguarding Children, Young and Vulnerable People

Child and Young People Friendly Statements of our Safeguarding Code of Conduct

## Related Legislation

This Policy supports our obligations under:

- United Nations Convention on the Rights of the Child
- Child Safe Standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse
- National Framework for Protecting Australia’s Children 2009-2020
- Australian Human Rights Commission National Principles for Child Safe Organisations

As such, our policies and procedures reflect child safe legislation and promote best practice and care for the children, young and vulnerable people within our organisation.

## Definitions

Bullying	<p>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:</p> <ul style="list-style-type: none"><li>• <b>Verbal</b> (name calling, put downs, threats);</li><li>• <b>Physical</b> (hitting, punching, kicking, scratching, tripping, spitting);</li><li>• <b>Social</b> (ignoring, excluding, ostracising, alienating); and/or</li><li>• <b>Psychological</b> (spreading rumours, stalking, dirty looks, hiding or damaging possessions).</li></ul>
Child or young person	<p>A person under the age of eighteen years.</p>
Emotional or psychological abuse	<p>Emotional or psychological abuse occurs when a child, young or vulnerable 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 to a child, young or vulnerable person. 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, young or vulnerable person’s physical, intellectual or emotional wellbeing and development.</p>
Family Violence	<p>Family violence occurs when children are forced to live with violence between adults in their home. It is harmful to children. 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, young or vulnerable person’s life. Exposure to family violence places children, young and vulnerable people at increased risk of physical injury and harm and has a significant impact on their wellbeing and development.</p>

Grooming	<p>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. Grooming can take place in any setting where a relationship is formed, such as leisure, music, sports and religious activities, or in internet chatrooms, in social media or by other technological channels.</p>
Harm	<p>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:</p> <ul style="list-style-type: none"> <li>• physical, psychological or emotional abuse or neglect;</li> <li>• sexual abuse or exploitation;</li> <li>• a single act, omission or circumstance; and</li> <li>• a series or combination of acts, omissions or circumstances.</li> </ul>
Frontline Personnel	<p>Includes any Personnel who are expected to interact directly with children, young or vulnerable people as part of their work at Warrambui. All employees, volunteer Interns and the Safeguarding Program Coordinator are Frontline Personnel.</p>
Neglect	<p>Neglect is the persistent failure or deliberate denial to provide the child, young or vulnerable person with the basic 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, young or vulnerable person’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.</p>
Online environment	<p>Anywhere online that allows digital communication, such as: social networks, text messages and messaging apps, email and private messaging, online chats, comments on live streaming sites and voice chat in games.</p>

Personnel	All who work for the organisation whether in a paid or unpaid capacity, including; employees, volunteers, Board and committee members, and contractors.
Physical abuse	Physical abuse occurs when a person subjects a child, young or vulnerable 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, young or vulnerable person. Physically abusive behaviour includes (but is not limited to) shoving, hitting, slapping, shaking, throwing, punching, biting, burning, suffocating, excessive and physically harmful over training, and kicking. It also includes giving children, young and vulnerable people 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, young or vulnerable person at risk of being hurt.
Risk management	In the context of creating safe environments for children, young and vulnerable people, risk management consists of assessing and taking steps to minimise the risks of harm to children, young and vulnerable people because of the action of an employee, volunteer, contractor or another child, young or vulnerable person. Risk management includes planning the work of the organisation to reduce or minimise situations where children, young and vulnerable people may be abused.
Safeguarding or Safeguarding Program	The suite of documentation which defines, manages and reviews Warrambui's commitment to ensure that children, young and vulnerable people feel safe and are safe within our care.
Sexual abuse	Sexual abuse occurs when an adult or a person of authority (e.g. older) involves a child, young or vulnerable person in any sexual activity. Perpetrators of sexual abuse take advantage of their power, authority or position over the child, young or vulnerable 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.

Sexual exploitation	Sexual exploitation is a form of sexual abuse where offenders use their power, (physical, financial or emotional) over a child, young or vulnerable person, or a false identity, to sexually or emotionally abuse them. It often involves situations and relationships where children, young and vulnerable people receive something (food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money etc.) in return for participating in sexual activities. Sexual exploitation can occur in person or online, and sometimes the child, young or vulnerable person may not even realise they are a victim.
Vulnerable Person	Any person self-identifying as a Vulnerable Person  Persons with exceptional needs (e.g. elderly, intellectual, disability). Where staff are unsure, be conservative and seek guidance from the Operations Manager or Centre Director.

### Key Responsibilities

Position	Responsibility
Board	<ul style="list-style-type: none"> <li>• Advocate and promote child rights, empowering and engaging children, young and vulnerable people in support of this Policy and its expectations.</li> <li>• Promote the commitment to this Policy and its expectations both internally and publicly.</li> <li>• Support Policy review on an 18-month cycle or at a time governed by legislation, regulations, or organisational learnings that promote a change to the Policy and all relevant Policy or procedural guidelines.</li> <li>• Ensure compliance to the Policy via an inbuilt mechanism for ongoing monitoring and review.</li> <li>• Ensure adequate resources are allocated to allow for the development, effective implementation, communication and continuous improvement of this Policy.</li> <li>• Ensure opportunities are provided for regular discussion and review at all levels to support a culture of openness and continued improvement and accountability to keeping children, young and vulnerable people safe from abuse and neglect.</li> </ul>

Centre Director	<ul style="list-style-type: none"> <li>• Advocate and promote child rights, empowering and engaging children, young and vulnerable people in support of this Policy.</li> <li>• Ensure all Personnel understand their obligations in accordance with this Policy and any relevant Policy and procedural documentation.</li> <li>• Ensure this Policy is implemented and adhered to amongst Personnel.</li> <li>• Ensure the development and implementation of required internal policy/ procedures and guidelines are in place to support Safeguarding practices in accordance with the expectations of this Policy.</li> <li>• Ensure adequate resources are allocated to allow effective implementation of this Policy.</li> <li>• Ensure to fully support Personnel to protect a child from abuse and neglect.</li> <li>• Ensure appropriate supports, such as counselling and formal debriefing, are provided for any Personnel involved in a matter relating to responding to a concern for the safety and wellbeing of a child, young or vulnerable person.</li> <li>• Proactively share resources and experience in the development of child safe initiatives as they are identified.</li> <li>• Develop opportunities for regular discussion and review at all levels to support a culture of continuous improvement and accountability in keeping children, young and vulnerable people safe from abuse and neglect.</li> <li>• Ensure that all Key Personnel are aware of the appropriate recruitment, screening and employment practice in relation to Warrambui's Safeguarding Program.</li> </ul>
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<p>Safeguarding Program Coordinator</p>	<ul style="list-style-type: none"> <li>• Provide guidance, support and advice to all Personnel in relation to concerns about a child, young or vulnerable person’s well being</li> <li>• Act as a key contact for queries, comments or concerns raised by Personnel, or external parties in relation to safeguarding children, young and vulnerable people from abuse and neglect</li> <li>• Act as a resource to Personnel and to provide connections to local community networks and agencies if needed (e.g. Department of Child Protection)</li> <li>• Ensure confidentiality at all times including the safe storage of all incident reports and associated documentation.</li> <li>• Review incident reports and provide feedback to Personnel</li> <li>• Report and provide full briefing to the Centre Director and Board Chair in the instance of an allegation of abuse being made against Personnel.</li> <li>• Report to the Centre Director on issues relating to Safeguarding and on compliance with the Safeguarding Program</li> <li>• Develop, maintain and review the Safeguarding Children, Young and Vulnerable People Policy and associated processes including: <ul style="list-style-type: none"> <li>○ Coordinate training and review of Safeguarding training records</li> <li>○ Be familiar with any major organisational change which may affect the Safeguarding Children, Young and Vulnerable People Policy and processes</li> <li>○ Be familiar with any updates to legislation and regulations which affect the Safeguarding Children, Young and Vulnerable People Policy and processes</li> <li>○ Periodically review the Safeguarding Children, Young and Vulnerable People Policy and processes and supporting documentation to ensure continuous improvement.</li> </ul> </li> <li>• Maintain accreditation with the Australian Childhood Foundation (ACF) by: <ul style="list-style-type: none"> <li>○ Acting as a key contact for communication between Warrambui and ACF in relation to the Safeguarding Children Program</li> <li>○ Coordinating with the ACF on any changes to accreditation requirements</li> <li>○ Conducting self-assessments of all areas of operation to ensure compliance with the Safeguarding Children Program requirements</li> <li>○ Notifying the Board and ACF of any serious breaches of the policies / processes.</li> </ul> </li> <li>• Serve as a member of the Safeguarding Sub-Committee</li> </ul>
<p>Safeguarding Sub-Committee</p>	<ul style="list-style-type: none"> <li>• Support the Safeguarding Program Coordinator to review Safeguarding policies and processes in consultation with relevant stakeholders</li> <li>• Support the coordination of the Safeguarding Program and its implementation</li> <li>• Evaluate and analyse complaints, concerns and safety incidents relating to this Policy</li> <li>• Provide training and advice in the application of this Policy</li> </ul>

<p>Employees / Volunteers / Contractors</p>	<ul style="list-style-type: none"> <li>• Advocate and promote child rights, empowering and engaging children, young and vulnerable people in support of this Policy.</li> <li>• Maintain a full understanding of the commitments and expectations of this Policy, as well as all other Safeguarding policies</li> <li>• Ensure compliance with this Policy, fully implementing and adhering to the commitments and expectations</li> <li>• To undertake any induction and training anticipated in this Policy, in relation to Warrambui’s Safeguarding Program.</li> <li>• To support a culture of openness, continued improvement and accountability to children, young and vulnerable people by engaging in regular review and discussion of organisational policies and practices and providing feedback to support improvement</li> <li>• To seek guidance from a manager or the Safeguarding Program Coordinator if there is ever any lack of understanding in relation to the commitments and expectations as set out in this Policy.</li> <li>• To adopt appropriate Safeguarding practice and behaviour</li> <li>• To take action to protect children, young and vulnerable people from all forms of abuse and neglect.</li> <li>• To report any abuse committed by Personnel within our organisation or by others.</li> <li>• To report any near-misses or breaches of safeguarding policies or procedures</li> <li>• To assist in creating and maintaining a child safe culture and a culture of inclusion and safety.</li> </ul>
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## 1.0 Our Commitment

Warrambui is committed to ensuring the safety and wellbeing of all children, young and vulnerable people who access our activities, services or facilities. Our policies and procedures seek to address risks to child safety and to establish a strong safeguarding culture.

As a part of this Safeguarding commitment, we are committed to equity and diversity and respecting the rights of all children to participate in decision making regardless of their background, circumstance, culture, abilities or identity.

Warrambui has zero-tolerance regarding child abuse and neglect and is committed to the rights of children to feel safe and be safe while in our care.

### 1.1 Safeguarding is a Shared Responsibility

Safeguarding children, young and vulnerable people is a shared responsibility within our organisation. It is the responsibility of all Personnel at Warrambui to:

- protect children, young and vulnerable people from all forms of abuse and neglect by our people;



- be alert to incidents of abuse and neglect occurring outside the scope of our operations and services that may have an impact on the children, young and vulnerable people to whom we provide a service;
- create and maintain a child safe culture that is understood, endorsed and put into action by all the individuals who work for, volunteer, support or access our programs and services;
- adhere to Warrambui’s practices and behaviour expectations within our Safeguarding Program while carrying out their role;
- report any abuse or neglect of which they become aware to our management and/or to external authorities responsible for child protection or to police, regardless of where that abuse comes from;
- anticipate children, young and vulnerable people’s diverse circumstances and respond effectively to their needs;
- inform children, young and vulnerable people of their rights and give all children, young and vulnerable people access to information, support and complaints processes
- respect the rights of children, young and vulnerable people to participate in decision making, paying appropriate attention to the needs of the following groups:
  - Aboriginal and Torres Strait Islanders
  - Children and young people with a disability
  - Children and young people from culturally and linguistically diverse backgrounds
  - LGBTQI+ (Lesbian, gay, bisexual, transgender, queer and intersex)
  - Children and young people who are unable to live at home

The responsibility of each role in relation to the development and compliance of Warrambui’s Safeguarding Children, Young and Vulnerable People Policy is detailed in the *Key Responsibilities* section of this Policy.

Any failure to observe our Safeguarding expectations is taken seriously, and we are committed to taking appropriate disciplinary and legal action wherever necessary.

## **1.2 Recruitment**

To minimise the likelihood of recruiting or otherwise engaging a person who is unsuitable to work or volunteer with children, young or vulnerable people, Warrambui requires all Frontline

Personnel to undergo extensive screening processes prior to appointment. We have recruitment procedures that ensure:

- our Safeguarding commitment is communicated to applicants for all positions
- interviews are held which include Safeguarding-related questions. Interviews are face-to-face by preference, via video-conference if required, and only voice-calls in exceptional circumstances.
- two reference checks are undertaken which include Safeguarding-related questions (including at least one professional referee wherever possible).
- appropriate screening checks are undertaken. These include identity verification, working with children checks and, where applicable, national and/or international criminal history checks and relevant qualification checks.

We require our Personnel to disclose criminal convictions or charges affecting their suitability to work with children, young and vulnerable people both prior to and subsequent to their engagement, and we periodically review police records and working with children checks.

### **1.3 Induction and Training**

Warrambui ensures that all Personnel are informed and supported to understand their Safeguarding responsibilities. As a part of the onboarding process, Frontline Personnel are required to complete Warrambui's Safeguarding induction. We utilise position descriptions and our Safeguarding policies to clearly communicate Safeguarding responsibilities and provide opportunities to seek clarity where required.

Upon commencement, new Frontline Personnel are briefed on and provided copies of our Safeguarding Children, Young and Vulnerable People Policy, Safeguarding Code of Conduct and Responding to Child Abuse Reports and Allegations Policy.

Warrambui requires all Frontline Personnel to acknowledge, in writing, their commitment and adherence to our Safeguarding Program.

We provide regular Safeguarding training for Frontline Personnel, which includes training regarding behavioural expectations, children's rights, cultural safety and continuous improvement.

We monitor and supervise Frontline Personnel for appropriate practice and behaviour in the delivery of our service to children, young and vulnerable people.

### **1.4 Safeguarding Governance**

Warrambui's Safeguarding governance structure has robust systems in place which support Personnel and service users to report Safeguarding concerns and facilitate effective risk-based and informed decisions that ensure accountability to children, young and vulnerable people.

Our Safeguarding Program is governed by the Safeguarding Program Coordinator and Safeguarding Sub-Committee. The role of Safeguarding Program Coordinator is held by the Centre Director, unless otherwise delegated.

The Safeguarding Sub-Committee must have access to the Risk Register, Guest Feedback records, and incident reports

Where no member of the Safeguarding Sub-Committee has access to these items , it is the responsibility of the Centre Director to provide monthly updates to the Safeguarding Sub-Committee.

The roles and responsibilities associated with providing oversight, management and implementation of our commitment to safeguarding children, young and vulnerable people are defined in the *Key Responsibilities* section of this Policy.

### **1.5 Continuous Improvement**

Warrambui encourages a culture of continuous improvement to ensure that all services and activities align with our Safeguarding commitment.

Warrambui actively seeks to improve services to children, young and vulnerable people by leveraging both external (feedback) and internal (review) resources and has developed processes to incorporate these into our Safeguarding practices.

#### **1.5.1 Involving Children, Young and Vulnerable People**

We have processes for seeking and incorporating input and feedback with children, young and vulnerable people and their families. We respect diversity and seek to facilitate effective communication and engagement.

We promote participation and empowerment of children, young and vulnerable people and provide opportunity for their voice and ideas to be heard, and space to express their needs and concerns. We actively encourage children, young and vulnerable people to take part in the decision-making process, particularly on matters affecting them. We create opportunities for involvement and seek input and feedback to inform our policies, procedures and practices.

We involve children, young and vulnerable people, and their families in developing a safe, inclusive and supportive environment. We provide information to children, young people and their families about:

- our commitment and approach to upholding and safeguarding the rights of children, young and vulnerable people
- the behaviour we expect of our Personnel
- the behaviour we expect from the children, young people and their families who access our services
- our policy and mechanism for reporting abuse or concerns.

### **1.5.2 Maintaining and Reviewing Policies and Procedures**

Warrambui seeks to continuously review and improve our policies, procedures and practices to safeguard children, young and vulnerable people from abuse and neglect. The responsibility for implementing and reviewing our Safeguarding Program is led by the Safeguarding Program Coordinator, in conjunction with the Safeguarding Sub-Committee.

To identify any key improvements needed, Warrambui incorporates findings from:

- internal audits / reviews that assess our ongoing compliance with our responsibilities to keep children, young and vulnerable people safe;
- input and feedback received from children, young and vulnerable people and their families;
- feedback gained from communication with our Personnel; and
- feedback gained from other guest sources (such as teachers or group leaders).

#### **Reporting Child Abuse**

Our Policy for reporting and responding to child abuse is approved and endorsed from the highest levels of our organisation and applies to all of our Personnel. The Policy states that:

- Personnel must immediately report abuse or neglect and any concerns with policies, practices or the behaviour of Personnel;
- Personnel must meet any legislated mandatory reporting requirements;
- Personnel must follow a specified process when reporting abuse or neglect including who will receive reports; and
- failure to report is serious misconduct.

Our Frontline Personnel are given a copy of and have access to the policy and understand the implications of the policy for their role. We document any allegation, disclosure or concern regarding child abuse and monitor responses to all allegations, disclosures or concerns.

### **2.0 Monitoring and Review**

This document will be reviewed at least every 18 months, in consultation with stakeholders. Some circumstances may trigger an early review, this includes but is not limited to legislative changes, organisational changes, incident outcomes and other matters deemed appropriate by the Board and/or the Centre Director. Warrambui retains records of each review undertaken. Such records may include minutes of meetings and documentation of changes to policies and procedures that result from a review.

External audit and verification based on a sample, conducted by the Australian Childhood Foundation shall occur at 3 yearly intervals.