

Child Safety & Wellbeing Handbook

A practical guide to implementing the Child Safety and Wellbeing Policy at Australian Red Cross



the
power of
humanity

“Children have a right to be protected from physical and mental harm and neglect, and enjoy the full range of human rights – civil, cultural, economic, political and social.”

(UNICEF, 2019)

© Copyright 2022 Red Cross

Last updated March 2022 by Sophie Mackey, A/ Manager Child Protection, Safeguarding & Practice

Previous update July 2019 by Isabel McLean and Sophie Mackey, Senior Child Protection Advisors, & Francisca Hoffman-Axthelm, Legal Counsel.

Warning: Aboriginal and Torres Strait Islander peoples are warned that the following document may contain images of deceased persons.

As part of a commitment to continuous improvement, this Handbook will be reviewed in conjunction with the Child Safety & Wellbeing Policy on a two-yearly basis. Additionally, these documents may be updated throughout the year as required.

Your thoughts, comments and suggestions are welcome via email safeguarding@redcross.org.au



Contents

1.	Introduction	5	5.	Responding to disclosure	31
1.1	Red Cross child safeguarding approach	5	5.1	The importance of taking disclosures seriously	31
1.2	National Principles for Child Safe Organisations	5	5.2	What to do if a child wishes to talk about an experience of abuse?	31
1.3	Red Cross Child Safety & Wellbeing Policy	7			
1.4	Why do we need a handbook?	7	6.	Reporting	35
1.5	Why is child safety and wellbeing so important at Red Cross?	7	6.1	Internal reporting	35
1.6	Child voice and empowering children	8	6.2	External reporting	35
1.7	Diversity and cultural difference	8		I) Mandatory reporting	35
				II) Voluntary reporting	36
				III) Contractual reporting	36
				IV) Reportable conduct and other legislated reporting	36
2.	Roles and responsibilities	11	6.3	Line Manager responsibilities - incident reporting	37
2.1	All Red Cross people, contractors, and partner organisations	11	6.4	Supplier (contractor) reporting processes and support	37
2.2	CEO, Executive, and State Director team	12	6.5	Reporting outside Australia	38
2.3	Line Managers	12	6.6	How to make a report in Australia	38
2.4	National Manager Child Protection, Safeguarding and Practice	12			
2.5	International Programs Safeguarding and PSEAH Adviser	12 13	7.	Investigation and disciplinary action	41
2.6	State/Territory Child Safety Leads	13	7.1	Obligation to act fairly	41
2.7	Child Safe Contact Officers (CSCO)	13	7.2	Immediate actions and risk management	41
2.8	People and Culture	13	7.3	How an internal investigation will be conducted	41
2.9	Volunteering and Membership	14			
2.10	Engagement and Support	14	8.	Information sharing, privacy and record keeping	45
2.11	Legal	14	8.1	What is information sharing?	45
2.12	Key Child Safety contacts	15	8.2	Record keeping and file sharing	45
			8.3	What to do if there is a privacy breach	46
			8.4	Requirement to retain records indefinitely	46
3.	Prevention	17			
3.1	Risk assessments	17	Definitions	48	
3.2	Child safe recruitment, on-boarding and training	17	References	52	
	I) Position descriptions	18	Attachments		
	II) Interviewing	18	Attachment 1 - Keeping Children Safe and Strong in Culture		
	III) Reference checks	18	Attachment 2 - Guidelines for Use and Storage of Images		
	IV) Screening practices	19	Attachment 3 - Child Safeguarding Risk Assessment		
	V) Probationary period	20	Attachment 4 - Recruitment Screening Check Guidance		
	VI) Training	20	Attachment 5 - Professional Boundaries and Safeguarding		
	VII) Supervision	22			
3.3	Suppliers	22			
3.4	Members	22			
3.5	Access to records	23			
3.6	Photography, film, the internet & social media	23			
4.	Identifying potential harm	25			
4.1	How might you become aware of concerns?	25			
4.2	Harm sub-types and indicators of harm	25			
	> Physical	26			
	> Sexual	26			
	> Emotional	27			
	> Neglect	28			
	> Exploitation	28			



Red Cross vision and purpose

Our Vision

Trusted as the leading humanitarian organisation making a genuine difference in the lives of people and communities.

Our Purpose

Bringing people and communities together in times of need and building on community strengths. We do this by mobilising the power of humanity.

1. Introduction

1.1 Red Cross child safeguarding approach

At Red Cross we often work in contexts where children experience heightened vulnerability or are made vulnerable due to their circumstances. Such circumstances include experiencing a disaster, or situations where children's education and connections may have been disrupted due to family or community crisis such as homelessness or forced migration.

We also must pay particular attention to the needs of Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and lesbian, gay, bisexual, transgender and intersex children and young people.

Working with children is a critical responsibility and at all times children have the right to be safe and protected. While safeguarding children may only seem relevant to direct work with children, it is in fact an organisation-wide responsibility. Red Cross' frequent and close work with communities and children, and the likelihood children may come to us at times of heightened vulnerability, make it critical that all Red Cross people are aware of our child safeguarding approach as outlined in the Red Cross Child Safety and Wellbeing Policy and this Handbook.

This approach is guided by the National Principles for Child Safe Organisations, relevant legislation, the Convention on the Rights of the Child, and underpinned by the Red Cross Vision, Purpose, Fundamental Principles, Ethical Framework, Child Safe Code of Conduct, Ways of Working, and supporting policies.



Note: All references to children in this Handbook are inclusive of young people. Red Cross defines a child as a person under the age of 18 years.

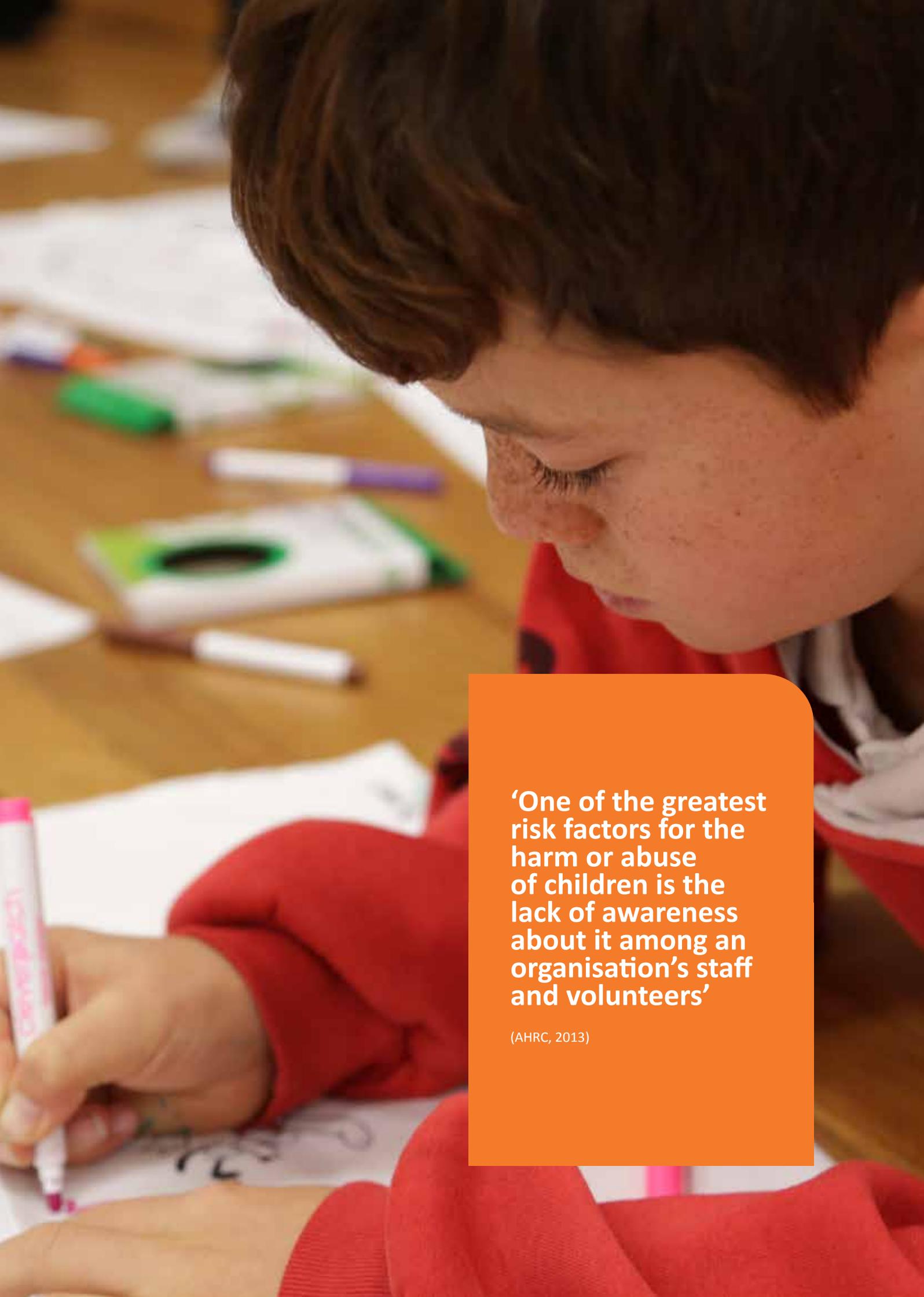
1.2 National Principles for Child Safe Organisations

In December 2017, the Royal Commission into Institutional Responses to Child Sexual Abuse released its final report. The report outlined a number of recommendations for institutions including the implementation of ten child safe standards.

At the request of the Australian Government, the National Children's Commissioner led the development of the National Principles for Child Safe Organisations, based on the ten child safe standards recommended by the Royal Commission. The Council of Australian Governments (COAG) endorsed the National Principles for Child Safe Organisations in February 2019.

National Principles for Child Safe Organisations

1. Child safety and wellbeing is embedded in institutional leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them, and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and in practice.
5. People working with children are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints and concerns are child-focused.
7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the National Child Safe Standards is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.



‘One of the greatest risk factors for the harm or abuse of children is the lack of awareness about it among an organisation’s staff and volunteers’

(AHRC, 2013)

1.3 Child Safety & Wellbeing Policy

In March 2022, the Red Cross Board adopted and endorsed a revised Red Cross Child Safety and Wellbeing Policy. The objective of the Policy is to support children to be safe, strong and well through a number of policy principles:

- › ensuring children of all abilities, identities, backgrounds and circumstances are safe, strong and respected in all we do
- › applying a holistic view of children's safety and wellbeing and practices aligned with the National Principles for Child Safe Organisations
- › valuing, respecting and listening to children and upholding the rights of the child
- › zero tolerance for any form of abuse, working with children, families and communities to support early intervention and prevent harm
- › acting in accordance with legal standards and obligations.

All Red Cross people are required to sign the [Child Safe Code of Conduct](#), committing to an agreed set of behaviour in relation to children. The full Policy can be found on the [Child Protection Lounge page](#) or [Red Cross Website](#).

1.4 Why do we need a handbook?

This Handbook is designed to be an accessible way to:

- › Understand the Child Safety & Wellbeing Policy
- › Apply the Policy in practice
- › Follow clearly set out processes and procedures when having direct contact with children, young people and families or access to their records
- › Understand your obligations in relation to legal compliance and best practice

This Handbook is available on the [Child Protection Lounge Page](#) and the [Red Cross Website](#). You may request printed copies of the Child Safety & Wellbeing Policy and Handbook from the Customer Care Team by emailing contactus@redcross.org.au or phone 1800 RED CROSS.

1.5 Why is child safety and wellbeing so important at Red Cross

Children form one of the most vulnerable groups in society. Children need special consideration because they:

- › Often hold the least power in society
- › Are more likely to be dependent on others to meet their needs
- › Are more likely to face challenges in raising their concerns or having their voice heard

Through the Child Safety and Wellbeing Policy we commit to approaches that support children to be safe, strong and well, and to protect children from harm in our work, including:

- › Fostering a child safe culture across the organisation
- › Embedding the National Principles for Child Safe Organisations
- › Making our commitments publicly visible and accessible
- › Actively seeking children's participation and feedback
- › Providing activities that are inclusive, meaningful, safe, and build resilience
- › Supporting and empowering families and carers
- › Paying particular attention to the needs of Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and lesbian, gay, bisexual, transgender and intersex children and young people
- › Embedding robust child safe recruitment practices
- › Ensuring all Red Cross People and in-scope suppliers and partners are informed about their responsibilities, sign and comply with the Child Safe Code of Conduct
- › Providing Red Cross People and in-scope suppliers and partners, with the knowledge and skills to keep children safe and minimise risks to children
- › Undertaking, reviewing and implementing child safety risk assessments

A child safe culture is everyone's responsibility and impacts on all areas of our work

"Child abuse is happening in organisations right now. It's not just in the past."

(VCCYP, 2018)

1.6 Child voice and empowering children

Children have a valuable contribution to make to the work of Red Cross. It is essential that children have a voice, that they are involved in decision making that affects them, and that they are involved in the design and implementation of programs and activities. When children are empowered they are more likely to report concerns and therefore are less vulnerable to abuse.

It is important that children are aware of their rights as outlined in the [Charter of Commitment to Children and Young People](#), and given age appropriate opportunities to provide feedback and make complaints, and that their complaints are acted on.

See the Child Protection Lounge page for a list of resources to help you seek input and feedback from children.

‘Children have the right to have a say in what they think should happen when adults are making decisions that affect them, and to have their opinions taken into account’.

(UNICEF, 2019)

1.7 Diversity and cultural difference

Red Cross is committed to child safety through respect for diversity and cultural difference, including:

- › Cultural safety of Aboriginal and Torres Strait Islander children
- › Cultural safety of children from culturally and linguistically diverse backgrounds
- › Safety of children with disability
- › Safety of lesbian, gay, bisexual, transgender and intersex children

A child safe organisation respects cultural differences and variations in child rearing practices due to a family’s personal, cultural, or religious beliefs. However, a child safe organisation recognises that these differences do not reduce a child’s right to be safe, or the organisation’s responsibility to protect the child from harm.

Red Cross people working in community, including Aboriginal and Torres Strait Islander employees and volunteers, know firsthand the importance of keeping Aboriginal and Torres Strait Islander children safe, well and strong, particularly in the context of the long history of discriminative colonisation policies, and the lack of trust in the government child welfare system. For more info on implementing the Child Safety & Wellbeing Policy in community see **Attachment 1- Keeping Children Safe and Strong in Culture** and the [Child Protection Lounge page](#).





"Some children are more vulnerable to abuse based on various factors including age, gender, ethnicity, disability, and prior abuse or neglect."

(Royal Commission, 2015)



2. Roles and Responsibilities

Child safety and wellbeing is the responsibility of **every** Red Cross person. It is not limited to people working with children, or having contact with children. We must all commit and adhere to ensuring children are protected.

In the words of Robert Fitzgerald, a Commissioner of the Royal Commission into Institutional Responses to Child Sexual Abuse, for an organisation to be child safe:

‘A culture of child safety needs to permeate from the board to the basement’.

Red Cross is committed to being a child safe organisation that recognises, respects and promotes children’s rights, and is committed to the following:

- › A Child Safety & Wellbeing Policy to enable actions needed to create a child safe organisation;
- › Strategies to foster an environment where children are listened to; their views are valued; and where they are encouraged to have input about what is important to them, including during service development;
- › Ensuring all Red Cross people sign and adhere to Child Safe Code of Conduct;
- › Child safe recruitment processes;
- › Informing Red Cross people of their role and responsibilities in relation to child safety and wellbeing;
- › Training Red Cross people to identify and appropriately respond to child safety and wellbeing concerns;
- › Proactively assessing and managing the risk of harm to children who come into contact with our services;
- › Listening to and acting on any concerns for children; and
- › Appointing and training child safeguarding focused roles across states and territories.

In addition to the organisational responsibilities to ensure Red Cross is a child safe organisation, every Red Cross person has responsibilities and accountabilities.

The following section outlines the high level responsibilities of all Red Cross people, including certain role specific responsibilities, to make sure Red Cross does all it can to ensure children are safe, strong and well.

Child Safe Code of Conduct

Red Cross has a Child Safe Code of Conduct that establishes clear expectations for appropriate behaviour with children, which all Red Cross people must sign and adhere to.

2.1 All Red Cross people, suppliers and partner organisations

Everyone within Red Cross is responsible for ensuring a culture of child safety and preventing child abuse. All Red Cross people (employees, members, volunteers and work experience students), suppliers (including contractors, sub-contractors and sole traders) and partner organisations are responsible for ensuring child safety and wellbeing, regardless of whether their role has contact with children. All Red Cross people, in scope¹ suppliers and partner organisations are required to:

- › Actively promote a child safe culture
- › Comply with the Child Safety & Wellbeing Policy, Handbook and Child Safe Code of Conduct
- › Report any concerns for a child, including suspected or alleged abuse, neglect or exploitation, as per the procedures in this Handbook
- › Report any breach of the Child Safe Code of Conduct, the Ethical Framework, the Child Safety & Wellbeing Policy or Handbook
- › Comply with child protection legislation (or other relevant law) in Australia, or in any other country in which Australian Red Cross is operating
- › Complete all child safeguarding training required for their role and seek support as required
- › Actively ensure children are given a voice in decisions that affect them, and supported to provide feedback and make complaints

1 The Red Cross Child Safety & Wellbeing Policy applies to suppliers and partner organisations who ‘provide services or work with Red Cross in connection with any Red Cross activity which involves direct or indirect contact with children, including access to children’s records.’

2.2 CEO, Executive and State Director team

The CEO, Executive and State Director team are accountable for the strategic oversight and implementation of the Child Safety and Wellbeing Policy and Handbook. Responsibilities include:

- › Actively promoting a child safe culture
- › Promoting and communicating the Policy and Handbook to increase awareness of safeguarding responsibilities
- › Monitoring the application of the Policy and Handbook including child safeguarding compliance requirements and practice improvements
- › Monitoring child safety and wellbeing incident reports and responding to any incidents escalated to them
- › Ensure child safeguarding remains a priority including as a standing item at Senior Leadership Team and other relevant meetings

2.3 Line Managers

Line Managers (including Volunteer Managers) are accountable for supporting their team (Red Cross people, contractors and partner organisations) to understand and adhere to the Child Safety and Wellbeing Policy, Handbook and Child Safe Code of Conduct, ensuring compliance at all times with screening and risk mitigation requirements so children are safe at all times. Responsibilities include:

- › Ensuring all employees, volunteers and suppliers are screened, on-boarded, trained and supervised in line with requirements outlined in this Handbook, and renew screening checks as required
- › Ensuring risk assessments are documented, updated and mitigation strategies implemented
- › Coaching Red Cross people on managing risk, and encouraging discussion and learning about risk management
- › Ensuring all Red Cross people demonstrate appropriate behaviours when engaging with children, addressing boundary breaches and other inappropriate behaviour at the earliest instance
- › Proactively responding to and reporting any concerns of child abuse, neglect or exploitation and escalating as appropriate
- › Oversight of all child safety and wellbeing incident reporting, ensuring appropriate actions are taken and closing incident reports once appropriately managed
- › Actively ensure children are given a voice in decisions that affect them, including program design, and ensuring age appropriate feedback and complaints mechanisms

It is critical responsibility for all Red Cross people to ensure compliance at all times with the child safeguarding risk mitigation strategies required under legislation and Red Cross policy, such as pre-employment screening including reference checks, WWCC clearances and renewals, supervision, training and risk management.

2.4 National Practice and Safeguarding Team

The National Manager Child Protection, Safeguarding and Practice manages a team who provide child and adult safeguarding and client practice advice, capacity building and support across Australian domestic operations. Responsibilities include:

- › Driving organisational compliance with the Child Safety and Wellbeing Policy, (Adult) Client Reportable Incident Policy, PSEAH and other relevant policies
- › Embedding and monitoring of child and adult safeguarding in the Red Cross incident reporting system (Report It) to support good practice and risk mitigation
- › Analysis of safeguarding issues and making recommendations for practice improvement
- › Recruitment supervision, guidance and support of State/Territory Child Safety Leads, ensuring consistency in practice across Australia
- › Collaborating with Talent & Culture and State/Territory Teams to ensure child safeguarding training is relevant and accessible for Red Cross people.

2.5 International Programs Safeguarding and PSEAH Adviser

The International Programs (IP) Safeguarding and PSEAH Adviser provides safeguarding advice within IP and leads the implementation of the IP Child Protection Implementation Plan. Responsibilities include:

- › Providing the IP team, delegates, and partners including the IFRC, ICRC and National Societies, with safeguarding advice, capacity building and support

- › Raising awareness of safeguarding requirements, including identifying risks
- › Development of an annual IP Child Protection Implementation Plan

2.6 State / Territory Child Safety Leads

Every State and Territory has a Child Safety Lead (Tasmania & Victoria combined) who are the child safety focal point for their jurisdiction. Responsibilities include:

- › Provision of local child safeguarding support and advice in relation to good practice and compliance with the Policy, Handbook and legislation
- › Monitoring and analysing child incident reports in their jurisdiction and working with teams to ensure consistency and quality in reporting
- › Recruitment, training and support of State/Territory Child Safe Contact Officers (CSCOs)
- › Coordination and facilitation of State/Territory quarterly child safe meetings
- › Delivery of child safeguarding training
- › Attending Senior Leadership Team (SLT) and other relevant meetings to provide updates and ensure managers are aware of their responsibilities



Note: The Child Safety Lead role is held in addition to a person's substantive role. The Child Safety Lead is jointly appointed by and reports to the relevant State/Territory Director and the National Manager Child Protection, Safeguarding and Practice.

Child Safe Meetings:

- Monthly National Child Safety Lead Meetings attended by all State/Territory Child Safety Leads, chaired by the National Manager Child Protection, Safeguarding and Practice
- Quarterly State/Territory Child Safe Meetings attended by State/Territory CSCOs and local P&C, chaired by the Child Safety Lead
- Child safeguarding should also be a standing item on Senior Leadership and individual Program Team Meetings

2.7 Child Safe Contact Officers

Child Safe Contact Officers (CSCOs) are a first point of contact to provide general Child Safety and Wellbeing policy information for Red Cross people. CSCOs are based in a range of locations, business units and areas of work to across the organisation. Responsibilities include:

- › Acting as a first point of contact for Red Cross people in matters relating to child safeguarding, referring people to the Child Safety Lead and Line Manager for consultation and advice
- › Working with the Child Safety Lead and other CSCOs to promote and embed good practice
- › Participation in State/Territory quarterly child safe meetings and other relevant meetings
- › Serving as local advocates for effective safeguarding and a child safe culture at Red Cross



Note: The CSCO role is held in addition to a person's substantive role. CSCOs are recruited and appointed by the Child Safety Lead in consultation with the Director, local P&C, and the National Manager Child Protection, Safeguarding and Practice. Details of the application and selection process for Child Safe Contact Officers are available on the [Child Protection Lounge page](#).

2.8 People and Culture (P&C)

P&C is responsible for ensuring all paid employees meet the requirements for a child safe organisation.

Responsibilities include:

- › Ensuring all employees have a police check, reference checks and sign the Child Safe Code of Conduct before they commence
- › Ensuring all employees in roles requiring a clearance to work with children (WWCC) are cleared (approved to work with children) before they commence, and renew as required
- › Ensuring a coordinated response to safeguarding related allegations against a Red Cross person or supplier in consultation with the Practice and Safeguarding team and relevant others (Risk, Legal)
- › Participation in quarterly State/Territory child safe meetings with Child Safety Lead and CSCOs

Talent and Culture are responsible for ensuring all Red Cross people complete mandatory safeguarding training. Responsibilities include:

- › Ensuring child safeguarding e-learning and virtual Induction is provided to all new employees upon commencement (to be completed as soon as possible and within 12 weeks of commencing)

- › Maintaining the Learning Gateway including records of all Red Cross people who have completed face-to-face, virtual and online training, and producing regular compliance reports
- › Supporting the development of training resources and co-facilitating virtual training sessions with the National Practice and Safeguarding Team, Child Safety Leads and relevant others

2.9 Volunteering and Membership

Volunteering and Membership (Hubs/Community Mobilisation Teams) are responsible for ensuring all volunteers and members meet the requirements for a child safe environment. Responsibilities include:

- › Ensuring all volunteers (and members in identified child facing roles) sign the Child Safe Code of Conduct before they start
- › Ensuring volunteers have a police check before they start (managed by Volunteering Recruitment Team), and renew as required
- › Ensuring any volunteer or member in a position which requires safeguarding screening (including reference checks/WWCC) is properly screened and cleared before they start, and renew as required
- › Ensuring volunteer induction is completed by all volunteers
- › Ensuring child safeguarding e-learning and any additional safeguarding training required is completed by volunteers and members (see section 3.2)
- › Participating in quarterly State/Territory child safe meetings

2.10 Engagement & Support

Engagement and Support Teams are responsible for ensuring all activities including fundraising, retail, media and communications appropriately manage risks to children. Responsibilities include:

- › Conducting appropriate risk management for all activities engaging or impacting children, particularly taking into account physical and online risks, and risks associated with external communications
- › Ensuring the appropriate use and storage of children's personal information, images and stories
- › Ensuring Red Cross expectations are clearly communicated to all Red Cross people, third parties and contractors through relevant training, screening and contract management as required

2.11 Legal

Legal is responsible for providing legal advice to Red Cross people in relation to child protection legislative, contractual and compliance requirements. Responsibilities include:

- › Managing Red Cross' response to subpoenas
- › Assisting Red Cross people to respond to requests for information, including from police
- › Supporting Red Cross people responding to high risk and complex child safety and wellbeing incidents including when there is a child safeguarding related allegation against a Red Cross person/people



Key child safety contacts

Child safeguarding can be complex and challenging. Red Cross has roles dedicated to helping Red Cross people navigate child safety, wellbeing and protection in the organisation. If you get stuck, have a question, or are unsure about anything related to child safety, contact them in addition to seeking support from your Line Manager.

Details available on the [Child Protection Lounge page](#). Alternatively, you can use the below email address:

National Manager Child Protection
Safeguarding and Practice
safeguarding@redcross.org.au

Child Safety Leads

ACT	actchildsafetylead@redcross.org.au
NSW	nswchildsafetylead@redcross.org.au
NT	ntchildsafetylead@redcross.org.au
SA	sachildsafetylead@redcross.org.au
TAS	taschildsafetylead@redcross.org.au
QLD	qldchildsafetylead@redcross.org.au
VIC	vicchildsafetylead@redcross.org.au
WA	wachildsafetylead@redcross.org.au





“All abuse harms children. Even injuries that are not visible can be profound. They can strike at a child’s sense of identity, make them fearful or ashamed, and reduce their ability to participate in their community”

(VCCYP, 2018)

3. Prevention

Early intervention and prevention of child abuse, neglect and exploitation is a key objective of the Red Cross Child Safety and Wellbeing Policy. This objective is achieved through the implementation of a number of processes by all Red Cross people, including:

1	Commitment to the Child Safe Code of Conduct
2	Embedding responsibility for child safety in all roles
3	Establishing child safeguarding leadership roles, including the National Practice and Safeguarding Team
4	Appointing State and Territory Child Safety Leads and Child Safe Contact Officers
5	Supporting effective risk management
6	Recruitment controls including safeguarding screening checks
7	Providing child safeguarding information and training
8	Implementing processes regarding access to records and ensuring appropriate information sharing
9	Supporting Red Cross people to maintain appropriate boundaries with children
10	Child focused consultation and engagement processes
11	Child friendly complaints and feedback processes

All Red Cross people must ensure they proactively create and maintain safe physical and online spaces when bringing children and young people together. This means not only preventing harm by adults, but also “peer-on-peer” abuse. See [Preventing Peer-on-Peer Abuse](#) on the Lounge to find out more.

3.1 Risk Assessments

One of the processes through which Red Cross people prevent harm occurring to the people we work with is through undertaking a risk assessment. Risk assessments must address:

- > Potential risks in undertaking an activity or delivering a service;
- > The impact of each identified risk occurring; and
- > Controls and mitigation strategies to manage the risks (including any additional controls which may be necessary).

It is a requirement that child safeguarding risks are addressed in the risk assessment for any program or activity with a high probability of engagement with children, such as a fundraising campaign targeted at school aged children, or where contact or involvement may be incidental but the risk is heightened due to increased vulnerabilities, such as in an emergency evacuation where children could be separated from their carers. It is important that all programs and activities consider the possibility of incidental child engagement and that risks to children are proactively managed at all times to prevent harm.

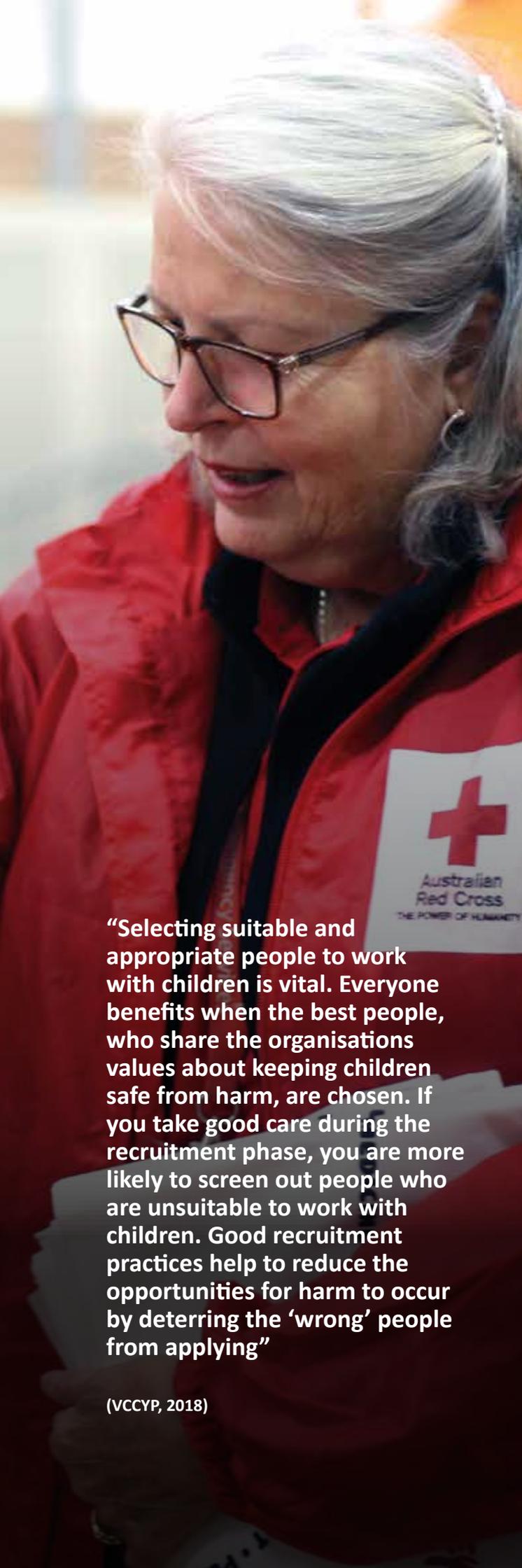
See **Attachment 3 - Child Safeguarding Risk Assessment Info Sheet** for a guide on:

- > Who should undertake risk assessments
- > How you can assess risks specific to child safety and wellbeing

For more information on the Red Cross Risk Management Process go to the [Risk page on the Lounge](#).

3.2 Child safe recruitment, on-boarding and training for Red Cross people and suppliers

Red Cross is a child-safe organisation and takes the safety and wellbeing of children very seriously. A crucial part of establishing and maintaining a safe environment for children is ensuring that the most suitable people are recruited to work and volunteer with children and that unsuitable people are screened out.



“Selecting suitable and appropriate people to work with children is vital. Everyone benefits when the best people, who share the organisations values about keeping children safe from harm, are chosen. If you take good care during the recruitment phase, you are more likely to screen out people who are unsuitable to work with children. Good recruitment practices help to reduce the opportunities for harm to occur by deterring the ‘wrong’ people from applying”

(VCCYP, 2018)

Child Safe Recruitment Practice

Robust child safe recruitment practices help us identify the most suitable people for any given role and deter unsuitable applicants. Maintaining effective child safe recruitment practices involves much more than screening checks, it includes:

- i. Position descriptions
- ii. Interviewing
- iii. Reference checks
- iv. Screening practices
- v. Probationary period of employment
- vi. Training
- vii. Supervision

I) POSITION DESCRIPTIONS

The first step to recruiting child safe people is to start with careful consideration of the position description, particularly if the role will involve any contact with children, including incidental contact. It is crucial to know and understand the exact skills required and the potential risk posed to children for both the role itself and the work environment. This will allow you to develop a clear job description that defines the roles, tasks, desirable skills, and experience required (Moore, 2018).

An explicit statement of commitment to child safety should be included in all Red Cross position descriptions. This clearly identifies Red Cross as a child safe organisation and deters people who may pose a risk to children.

The position description must clearly state if a Clearance to Work With Children (WWCC) is a requirement for the role. See **Attachment 4 - Working with Children Check/ Vulnerable People Check Guidance Tools** for guidance in how to determine if a position requires a WWCC.

II) INTERVIEWING

The interview process is a very important step in selecting the right person for a role and in identifying anyone who may pose a risk to children. Open-ended, behavioural questions may give insight into the applicant’s values, attitudes and understanding of professional boundaries and accountability.

III) REFERENCE CHECKS

Reference checks are crucial, and must be conducted for all employees, as well as for all volunteers in roles that have contact with children or access to records. A failure to properly check references can compromise safety for children and Red Cross. Reference checks are best conducted over the phone or in person. Good child safe

practice is for a reference check to be undertaken with the applicant's most recent supervisor(s). Conduct a minimum of two verbal reference checks.

Suggested child safe related questions are:

- > Have you observed the person interacting with children?
- > Can you describe the types of relationships and interactions the person has had with children?
- > Do you have any concerns about the applicant working directly with children or other vulnerable people?
- > Are you comfortable knowing the applicant could sometimes be alone with children?
- > Are you aware of any complaints that were made about the applicant's behaviour or attitudes toward children or other vulnerable people?

Volunteer Reference Checks: a minimum of two professional (objective) verbal reference checks must be conducted for prospective volunteers in certain roles "working with children" before they commence in the role, as part of the pre-commencement selection process, to ensure they are appropriate to work with children and no concerns have been raised in the past about their behaviour or attitudes toward children. See the [Child Protection Lounge](#) for information on which volunteer roles require reference checks as well as frequently asked questions. For additional support conducting reference checks, contact your Child Safety Lead, Hub, or safeguarding@redcross.org.au



For more information on recruitment and selection processes at Red Cross go to:

For Employees - [The Recruitment Lounge Page](#)

For Volunteers - [The Volunteer Recruitment Lounge Page](#)

IV) SCREENING PRACTICES

Appropriate pre-employment screening checks are essential. However they are only one part of child safe practice at Red Cross. A clearance to work with children and Police Check alone will not make Red Cross a safe place for children. They must be used alongside broader child-safe strategies.

Police Checks: All employees and volunteers are required by policy to have a Police check (prior to commencing, and renewed at least every five years).

WWCC: A clearance to work with children (Working With Children Check, Blue Card, Ochre Card, Working With Vulnerable People Check, Registration to Work with Vulnerable People) helps protect children from harm by screening applicants' criminal and professional conduct (depending on jurisdiction) and preventing people who pose an 'unjustifiable risk' to children from working with them.

Interview question tips

If the role involves contact with children, good discussion areas include:

- > Asking the applicant about their motivation for working with children, for instance, asking questions such as: "tell us about why you want to work with children?"
- > Exploration of the applicant's work history, their roles and responsibilities, and reasons for leaving their last job (especially where their previous roles involved working with children).

Depending on the role the applicant has applied for child safe questions include:

- > We are all responsible for Child Safety at Red Cross. What will you do to support this commitment and make sure children are safe and well at Red Cross?
- > Please describe a time when you had a concern for the safety or wellbeing of a child. Why were you concerned? What action did you take, and what was the outcome?
- > Please provide us with an example of when you have conducted a risk assessment that considered the safety of children.
- > Managing staff during a child protection incident involves a number of actions, can you provide us with an example of how you have supported the reporting and responses process in the past?

A list of Red Cross recommended behavioural interview questions can be found on the Lounge - [Child Protection example questions and guidance](#).

No Check No Start: No Red Cross person in a role requiring a WWCC can commence in their role until the appropriate check is completed and they have been cleared (approved to work with children) by the regulator. See the [Child Protection Lounge](#) for more information.

See the [Safeguarding Screening Tools](#) on the Lounge and **Attachment 4 - Working with Children Check/Vulnerable People Check Guidance Tools** which outlines when a role requires a WWCC as well as approval, compliance, onboarding and renewal processes.

Screening outcomes: Red Cross will not permit any person to work or have contact with children, or have access to records relating to children, if that person poses an unacceptable risk to children’s safety or wellbeing. This applies to all Red Cross People and in scope suppliers and partners.

Where a potential risk is detected through screening, i.e. a person cannot/does not get a WWCC clearance, safeguarding concerns are raised through reference checks or the Police Check reveals a Disclosable Court Outcome (DCO) that represents a potential risk to vulnerable people, **the person must not be employed into role that has contact with children.** Alternative roles that do not provide access to children or vulnerable people should be considered. All matters are managed in a highly confidential manner.

- > For Police Checks – Local P&C is notified of a DCO, and consults with the National Manager Child Protection, Safeguarding and Practice as required.
- > For WWCCs - Recruitment Teams will be notified if the applicant's WWCC clearance is declined seeking advice from National Manager Child Protection, Safeguarding and Practice as required.

While screening checks are an essential tool for keeping children safe, they are only one part of creating a child-safe environment at Red Cross.

V) PROBATIONARY PERIOD OF EMPLOYMENT

Probation periods help Line Managers to further assess a new employee's performance and suitability for the job before proceeding with permanent employment. If there are any concerns about the person working with children, Managers must consider whether they should remain in the job, communicating concerns as early as possible to P&C to ensure appropriate probationary processes are in place.

VI) CHILD SAFEGUARDING TRAINING

Red Cross provides training to ensure that Red Cross people are equipped with the knowledge, skills and awareness to

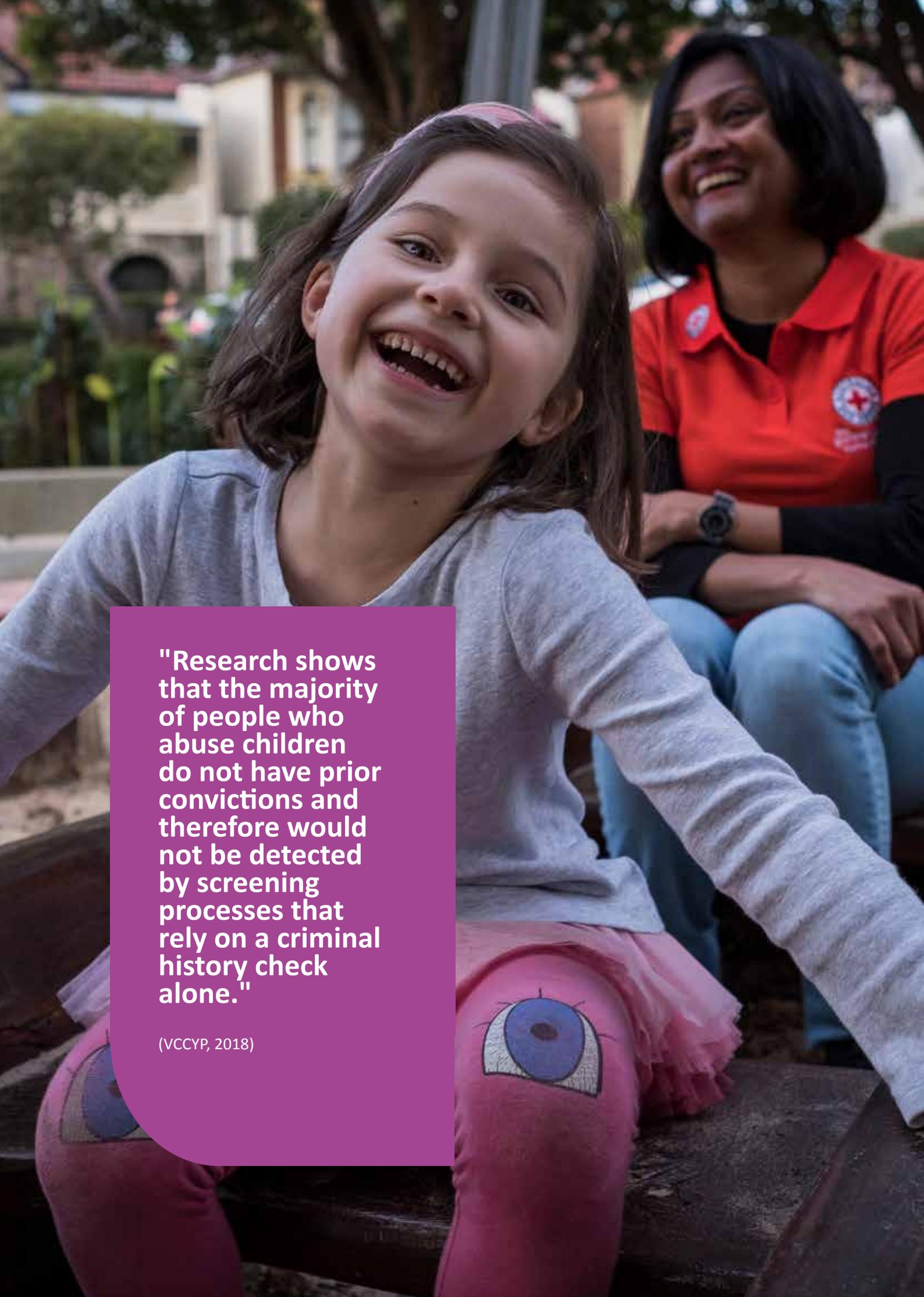
keep children safe. Child safeguarding training is compulsory for Red Cross people. It is delivered in a variety of ways depending on the nature of the role held by the Red Cross person.

Training ensures Red Cross people are:

- > Supported to implement the Child Safety and Wellbeing Policy
- > Aware of their responsibility to proactively ensure children are safe
- > Able to recognise indicators of child abuse, neglect and exploitation
- > Able to effectively respond to child safety and wellbeing concerns including responding to disclosures and managing incidents
- > Supported to build a child safe organisation

Red Cross people must receive ongoing safeguarding training, supervision, coaching and support. They are expected to be aware of their obligations under the Policy and this Handbook, including mandatory reporting of child abuse, neglect and exploitation concerns, and personal responsibility to seek additional support as needed.

MINIMUM MANDATORY TRAINING - EMPLOYEES
Virtual induction (as soon as possible and within 12 weeks of commencing)
E-Learning (as soon as possible and within 12 weeks of commencing)
Employees in roles that have contact with children and families, and their managers/supervisors, must complete the appropriate level of Keeping Kids Safe Training
Additional training relevant to their role as identified by their line manager and local requirements eg. manager's essentials.
MINIMUM MANDATORY TRAINING - VOLUNTEERS
Volunteer Induction E-Learning (includes safeguarding)
Volunteers in roles that work with children and families must complete the appropriate level of Keeping Kids Safe Training as determined for their role
Additional training relevant to their role as identified by their line/volunteer manager and local requirements
For more information contact: cp_training@redcross.org.au

A young girl with long brown hair, wearing a grey long-sleeved shirt and pink pants with large eye-shaped patches, is laughing joyfully. She is sitting on a wooden bench. Behind her, a woman with dark hair, wearing a red polo shirt with a Red Cross logo and blue jeans, is smiling warmly. The background shows a residential area with trees and buildings.

"Research shows that the majority of people who abuse children do not have prior convictions and therefore would not be detected by screening processes that rely on a criminal history check alone."

(VCCYP, 2018)

Talent and Culture are responsible for the coordination and delivery of induction and e-learning training for Red Cross People, with support from the Practice and Safeguarding Team and Child Safety Leads.

Talent and Culture are responsible for maintaining the Learning Gateway, which records details, once provided, of all Red Cross people (employees, volunteers and members) who have been completed training.

Red Cross people providing training must ensure accurate records of training attendees are entered into the system. For more information contact the Virtual Learning and Induction Coach, joblitas@redcross.org.au

Line/Volunteer Managers, Volunteer Hubs/Community Mobilisation Teams and ultimately State/Territory Directors are responsible for ensuring all Red Cross People and Suppliers complete the required screening, induction and training, and access ongoing training and supervision as required for their role. It is critical Line/Volunteer Managers ensure no one is placed in a client facing role without completing the required screening, induction and training required for the role and WWVP renewals required.

To access a range of internal training, including online training, go to the [Red Cross Learning Gateway](#). For additional training options see the Child Protection Lounge Page.

VII) SUPERVISION

It is essential that Line Managers provide early and ongoing supervision, coaching and support to guide Red Cross People in their work with children, facilitate professional development, ensure strong professional boundaries are maintained, and to proactively and explicitly address any concerning behaviours from the very earliest instance.

See the [Introduction to Supervision Practice Guide](#) on the [Client Practice Lounge](#).

3.3 Suppliers

It is crucial that any suppliers (including contractors and sole traders) engaged by Red Cross do not pose a risk to children. For this reason, the same safeguarding screening and compliance requirements apply to suppliers who provide services or work with Red Cross in any activity which involves contact with children or access to records relating to children.

Red Cross people must ensure that the contract or agreement with the supplier details the Red Cross child safeguarding measures applicable for the work in which they are being engaged.

Red Cross has developed a clear and mandatory process that must be followed when engaging a supplier (previously known as contractor) to ensure child safety. It can be found on the [Managing Contractors page on the Lounge](#) "Step 4: Compliance requirements when engaging a contractor".

Where a supplier is engaged in brief (less than 8 hours) and one off (has not worked for Red Cross before and will not again) work with Red Cross, and there are strong additional risk mitigation strategies in place (such as supervision at all times by a Red Cross person) you may email safeguarding@redcross.org.au to request an exemption to the required screening and compliance requirements detailed in "Step 4: Compliance requirements when engaging a contractor" on the [Managing Contractors page on the Lounge](#).

Definition

Supplier

Any person or organisation (other than a Red Cross Person) working with or providing goods or services to Red Cross. Includes contractors, sub-contractors, sole traders, agents and consultants.

See [Managing Contractors](#) page on the Lounge for detailed examples.

3.4 Red Cross Members

The point of contact for Red Cross members is the local State or Territory Volunteer Hub or equivalent (e.g. Community Mobilisation Team).

Red Cross members engaged in work that may involve contact with children or that directly involves working with

children, are to be on-boarded as volunteers to ensure child safety.

For example: If a member branch decides to run a regular homework group for children, these members must be on-boarded as volunteers, complete with all the screening and training requirements.

Prior to commencement of an activity that may involve members having contact with children, a risk assessment of the activity is to be undertaken with the Volunteer Hub/Community Mobilisation Team.

3.5 Access to records

Any Red Cross person must not access, or seek to access, any confidential records that include the personal details of a child, unless:

- > you have successfully completed all screening checks in accordance with the Child Safety and Wellbeing Policy and the Recruitment and Selection Policy; and,
- > you legitimately need to know any information which may be contained in that record as prescribed in your position description or which legitimately arises in connection with your role.

If you are unsure whether it is appropriate for you to access a child's information, you must not attempt to do so without documented approval from your Line Manager. See also Chapter 8 - Information Sharing, Privacy and Record Keeping.

3.6 Photography, film, the internet and social media

Red Cross is committed to ensuring children's details, images and stories are always used with their consent, in ways that are empowering to the child, and do not make them more vulnerable.

Red Cross will protect children from having their personal details revealed, being exposed to pornography and other inappropriate content, and being vulnerable to contact from sexual predators on the internet and social media.

As a Red Cross person, you must comply with and use the following:

- > [Child Safety and Wellbeing Policy](#)
- > [Engagement and Support Policies](#) including in particular:
 - > [Photographic Images and Digital Resources Policy](#)
 - > [Checklist Using Images of Children](#)
 - > [Standing Photography Videography Brief and Contract](#)
 - > [Photo and Video Release and Privacy Collection Notice](#) (Formerly called Image Release Form)

You must also comply with:

- > [The Child Safe Code of Conduct](#) in connection with use of computers, mobile phones, video cameras, cameras, social media, filming, photographing and use of children's images
- > The Child Safety and Wellbeing Handbook **Attachment 2: Guidelines for use and storage of images**



4. Identifying potential harm

4.1 How might you become aware of concerns

As a Red Cross person you may become aware of concerns that a child has been harmed, is being harmed, or is at risk of harm through:

- > direct observation
- > being informed by others
- > a disclosure by a child or young person

All suspicions that a child has been, is being, or could be in danger of being abused must be taken seriously.

DIRECT OBSERVATION

Being able to identify indicators of abuse, neglect and exploitation means that Red Cross people are supported to be proactive and reduce the reliance on children needing to disclose harm. We are more likely to become aware of child safeguarding concerns for a child through our observations, than through them telling us.

IDENTIFYING SIGNS OF HARM

As Red Cross people it is essential that you understand and can recognise the physical and behavioural indicators of harm to a child. Child safeguarding concerns are often identified through observation, and Red Cross people can be best-placed to identify and appropriately respond to abuse, neglect and exploitation through their work with children, families and communities. In certain instances, Red Cross people are the only adults in a position to identify that a child may have been harmed, or is at risk of harm, with the knowledge of how best to respond. The different types of harm which may be experienced by children and the indicators to look out for are set out in the following section.



Remember. if you are unsure, if you want more information or if you have child safety concerns, speak to your Line Manager, Child Safety Lead or a Child Safe Contact Officer.

Grooming

Perpetrators of child sexual abuse can be predatory in nature, drawing victims to them by using calculated 'grooming' tactics. Grooming refers to actions deliberately undertaken to befriend and influence a child (and, in some circumstances, members of the child's family) with the intention of achieving the criminal objective of sexual activity with children.

Grooming can occur in person or online (e.g. via Facebook) and is designed to help the perpetrator establish an emotional connection in order to lower the child's inhibitions.

Ensuring you understand the warning signs of grooming will make it far more likely you will be able to detect and respond to potential child sexual abuse.

(Moores, 2018)

4.2 Harm sub-types and indicators of harm

As different type of harm have different features, it is important to distinguish between what are commonly regarded as the main subtypes of harm: physical abuse, sexual abuse, emotional abuse, neglect and exploitation.

The Child Safety and Wellbeing Policy and this Handbook uses the phrase 'child abuse, neglect and exploitation' to highlight neglect and exploitation as forms of child abuse.

Sometimes exposure to family and domestic violence will be recognised as separate harm type, (CFCA, 2018) but for the purposes of this Handbook exposure to family and domestic violence is identified as a form of emotional abuse.

Physical Harm

Physical harm can consist of any non-accidental infliction of physical harm or injury on a child by any person. Physical abuse may be an isolated incident or a pattern of injuries, and does not require the person to have intended physical harm. Examples of physical abuse may include beating, shaking or burning, assault with implements, supplying alcohol/drugs and other harmful substances, injuries which are caused by excessive discipline and female genital mutilation.

WHAT ARE THE PHYSICAL AND BEHAVIOURAL INDICATORS OF PHYSICAL HARM?

Physical indicators of physical harm may include (but are not limited to):

- › Bruises or welts on facial areas and other areas of the body, e.g. back, bottom, legs, arms and inner thighs;
- › Bruises or welts in unusual configurations, or those that look like the object used to make the injury, e.g. fingerprints, handprints, buckles, iron or teeth;
- › Burns from boiling water, oil or flames or burns that show the shape of the object used to make them, e.g. iron, grill, cigarette;
- › Fractures of the skull, jaw, nose and limbs (especially those not consistent with the explanation offered, or the type of injury possible at the child's age of development);
- › Cuts and grazes to the mouth, lips, gums, eye area, ears and external genitalia;
- › Bald patches where hair has been pulled out;
- › Multiple injuries, old and new;
- › Effects of poisoning; or
- › Internal injuries.

Behavioural indicators of physical child abuse may include (but are not limited to):

- › Disclosure of an injury inflicted by someone else (parent, carer or guardian), or an inconsistent or unlikely explanation of an injury, or an inability to remember the cause of injury;
- › Unusual fear of physical contact with adults;
- › Aggressive behaviour;
- › Disproportionate reaction to events;
- › Wearing clothes unsuitable for weather conditions to hide injuries;
- › Wariness or fear of a parent, carer or guardian
- › Reluctance to go home;
- › No reaction or little emotion displayed when being hurt or threatened;
- › Habitual absences from school without reasonable explanation;
- › Overly compliant, shy, withdrawn, passive and uncommunicative;

- › Unusually nervous, hyperactive or aggressive;
- › Disruptive and destructive to self and/or others;
- › Poor sleeping patterns, fear of the dark or nightmares and regressive behaviour, e.g. bed-wetting; or
- › Drug or alcohol misuse, suicidal thoughts or self-harm.

Child Sexual Abuse

Child sexual abuse is when a person uses power or authority over a child to involve them in sexual activity. It can include a wide range of sexual activity, including fondling the child's genitals, oral sex, vaginal or anal penetration by a penis, finger or other object, or exposure of the child to pornography.

Child sexual abuse may not always include physical sexual contact and can also include non-contact offences, for example:

- › Talking to a child in a sexually explicit way;
- › Sending sexual messages or emails to a child;
- › Exposing a sexual body part to a child;
- › Forcing a child to watch a sexual act (including showing pornography to a child); or
- › Having a child pose or perform in a sexual manner (including child sexual exploitation).

What is child sexual exploitation?

Child sexual exploitation is also a form of sexual abuse where offenders use their power (physical, financial or emotional) over a child to sexually or emotionally abuse them. It often involves situations and relationships where young people receive something (food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money, etc.) in return for participating in sexual activities. Child sexual exploitation can occur in person or online and sometimes the child may not realise that they are a victim.

Who is most at risk of child sexual abuse?

Any child can be victim to sexual abuse, however children who are vulnerable, isolated and/or have a disability are much more likely to become victims and are disproportionately abused.

Who are the most common perpetrators of child sexual abuse?

Child sexual abuse is most commonly perpetrated by someone who is known to, and trusted by, the child. The perpetrator is often someone highly trusted within their family, community, schools and/or other organisation.

Perpetrators can include (but are not limited to):

- › A family friend or stranger via a forced marriage (where a child is subject to a marriage without their consent, arranged for by their immediate or extended family - this

constitutes a criminal offence and must be reported).

- › A family member (this is known as intra-family abuse and can include sibling abuse); or
- › A school staff member, coach or other carer a peer/child 10 years or more in age*



***Please note.** Unwanted sexual behaviour toward a child by a person 10 years or over can constitute a sexual offence in some jurisdictions, and may be referred to as young person on young person sexual offending. A child who is under 10 years of age is not usually considered capable of committing an offence. Any suspected sexual behaviours by children under 10 are referred to as problem sexual behaviour, and may require specialist intervention.

WHAT ARE THE PHYSICAL AND BEHAVIOURAL INDICATORS OF CHILD SEXUAL ABUSE?

Physical indicators of sexual abuse may include (but are not limited to):

- › Injury to the genital or rectal area, e.g. bruising, bleeding, discharge, inflammation or infection;
- › Injury to areas of the body such as breasts, buttocks or upper thighs;
- › Discomfort in urinating or defecating;
- › Presence of foreign bodies in the vagina and/ or rectum;
- › Sexually-transmitted infections;
- › Frequent urinary tract infections;
- › Pregnancy, especially in very young adolescents; or
- › Anxiety-related illnesses, e.g. anorexia or bulimia.

Behavioural indicators of sexual abuse may include (but are not limited to):

- › Disclosure of sexual abuse, either directly (from the alleged victim) or indirectly (by a third person or allusion);
- › Persistent and age-inappropriate sexual activity, e.g. excessive masturbation or rubbing genitals against adults;
- › Drawings or descriptions in stories that are sexually explicit and not age-appropriate;
- › Fear of home, specific places or particular adults;
- › Poor/deteriorating relationships with adults and peers;
- › Poor self-care or personal hygiene;
- › Complaining of headaches, stomach pains or nausea without physiological basis;
- › Sleeping difficulties;
- › Regressive behaviour, e.g. bed-wetting or speech loss;
- › Depression, self-harm, drug or alcohol abuse, or attempted suicide;
- › Sudden decline in academic performance, poor memory and concentration;
- › Engaging in sex work and/or sexual risk-taking behaviour; or
- › Wearing layers of clothing to hide injuries and bruises.

You must follow the reporting processes if you suspect that:

- › A child has been or is being sexually abused, or is at risk of sexual abuse; or
- › A Red Cross Person or supplier may be engaging, or are at risk of engaging in sexual behaviour with a child/children

All incidents, suspicions and disclosures of child sexual abuse must be responded to by following the reporting processes set out in this Handbook. Child sexual abuse does not always involve force. In some circumstances a child may be manipulated into believing that they have brought the abuse on themselves, or that the abuse is an expression of love, through a process of grooming.

Emotional Harm

Emotional (or psychological) harm occurs when a child is (usually repeatedly) rejected, isolated or frightened by threats. Although it is possible for 'one-off' incidents to cause serious harm, in general, it is the frequency, persistence and duration of the parent or carer's behaviour that determines the consequences for the child or young person. Emotional abuse includes exposure to domestic violence, hostility, derogatory name-calling and put-downs, and lack of emotional warmth or availability from a person, to the extent that the child suffers, or is likely to suffer, emotional or psychological harm.

WHAT ARE THE PHYSICAL AND BEHAVIOURAL INDICATORS OF EMOTIONAL HARM?

Physical indicators of emotional harm may include (but are not limited to):

- › Speech disorders such as language delay, stuttering or selectively being mute (only speaking with certain people or in certain situations); or
- › Delays in emotional, mental or physical development.

Behavioural indicators of emotional abuse may include (but are not limited to):

- › Overly compliant, passive and undemanding behaviour;
- › Extremely demanding, aggressive and attention-seeking behaviour or anti-social and destructive behaviour;
- › Low tolerance or frustration;
- › Poor self-image and low self-esteem;
- › Unexplained mood swings, depression, self-harm or suicidal thoughts;
- › Behaviours that are not age-appropriate, e.g. overly adult, or overly infantile;
- › Fear of failure, overly high standards, and excessive neatness;
- › Poor social and interpersonal skills;
- › Violent drawings or writing; or
- › Lack of positive social contact.

Neglect

Neglect is the failure by a parent or caregiver to provide a child (where they are in a position to do so), with the conditions that are culturally accepted in society as being essential for their physical and emotional development and wellbeing. It includes supervisory, physical, medical, emotional, educational neglect or abandonment.

In some circumstances the neglect of a child:

- › Can place the child's immediate safety and development at serious risk; or
- › May not immediately compromise the safety of the child, but is likely to result in longer term cumulative harm.

Sometimes neglect is referred to as three different levels:

- › 'Minor' neglect is low-level neglect that is trivial or temporary;
- › 'Significant' neglect is medium-level neglect that causes harm to a child that is more than trivial or temporary; and
- › 'Serious' neglect is the highest level of neglect. It involves the continued failure to provide a child with the basic necessities of life, such as food, clothing, shelter, hygiene, medical attention or adequate supervision, to the extent that the child's health, safety and/or development is, or is likely to be, jeopardised. Serious neglect can also occur if an adult fails to adequately ensure the safety of a child where the child is exposed to extremely dangerous or life threatening situations.

WHAT ARE THE PHYSICAL AND BEHAVIOURAL INDICATORS OF NEGLECT?

Physical indicators of neglect may include (but are not limited to):

- › Appearing consistently dirty and unwashed;
- › Being consistently inappropriately dressed for weather conditions;
- › Being at risk of injury or harm due to lack of adequate supervision for age;
- › Being consistently hungry, tired and listless;
- › Having unattended health problems and lack of routine medical care; or
- › Frequent illness;
- › Lack of age appropriate weight gain (failure to thrive);
- › Having inadequate shelter and unsafe or unsanitary conditions.

Behavioural indicators of neglect may include (but are not limited to):

- › Gorging when food is available or inability to eat when extremely hungry;
- › Begging for or stealing food;
- › Appearing withdrawn, listless, pale and weak, aggressive behaviour, irritability, involvement in criminal activity;
- › Little positive interaction with parent, carer or guardian;
- › Poor socialising habits;
- › Excessive friendliness towards strangers;
- › Indiscriminate acts of affection;
- › Poor, irregular or non-attendance at school;
- › Staying at school for long hours and refusing or being reluctant to go home;
- › Self-destructive behaviour; or
- › Taking on an adult role of caring for a parent or sibling, which is inappropriate for the child's age.

Exploitation

Child exploitation, also referred to as "criminal exploitation of a child" is the use of a child for economic or personal gain such as child labor, slavery, sex tourism, and the "sale" or illegal adoption of children for profit. Child exploitation includes any of the following:

- › using a child for profit, unlawful labour, sexual gratification, or some other personal or financial advantage
- › committing or coercing another person to commit an act or acts of abuse against a child
- › possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material (including pornography)
- › committing or coercing another person to commit an act or acts of grooming or online grooming.

WHAT ARE THE POTENTIAL INDICATORS OF EXPLOITATION?

Indicators of exploitation may include (but are not limited to):

- › hanging out with new friends, some may be much older
- › sudden access to money or things they couldn't normally afford
- › sudden mood changes
- › secretive mobile phone use
- › using a second mobile phone
- › frequent absconding, nights away from home, skipping school or their whereabouts are unknown
- › suddenly dressing differently
- › spending a lot of time online
- › being increasingly secretive about what they are doing
- › cuts, burns or bruises that can't be explained.

Modern Slavery

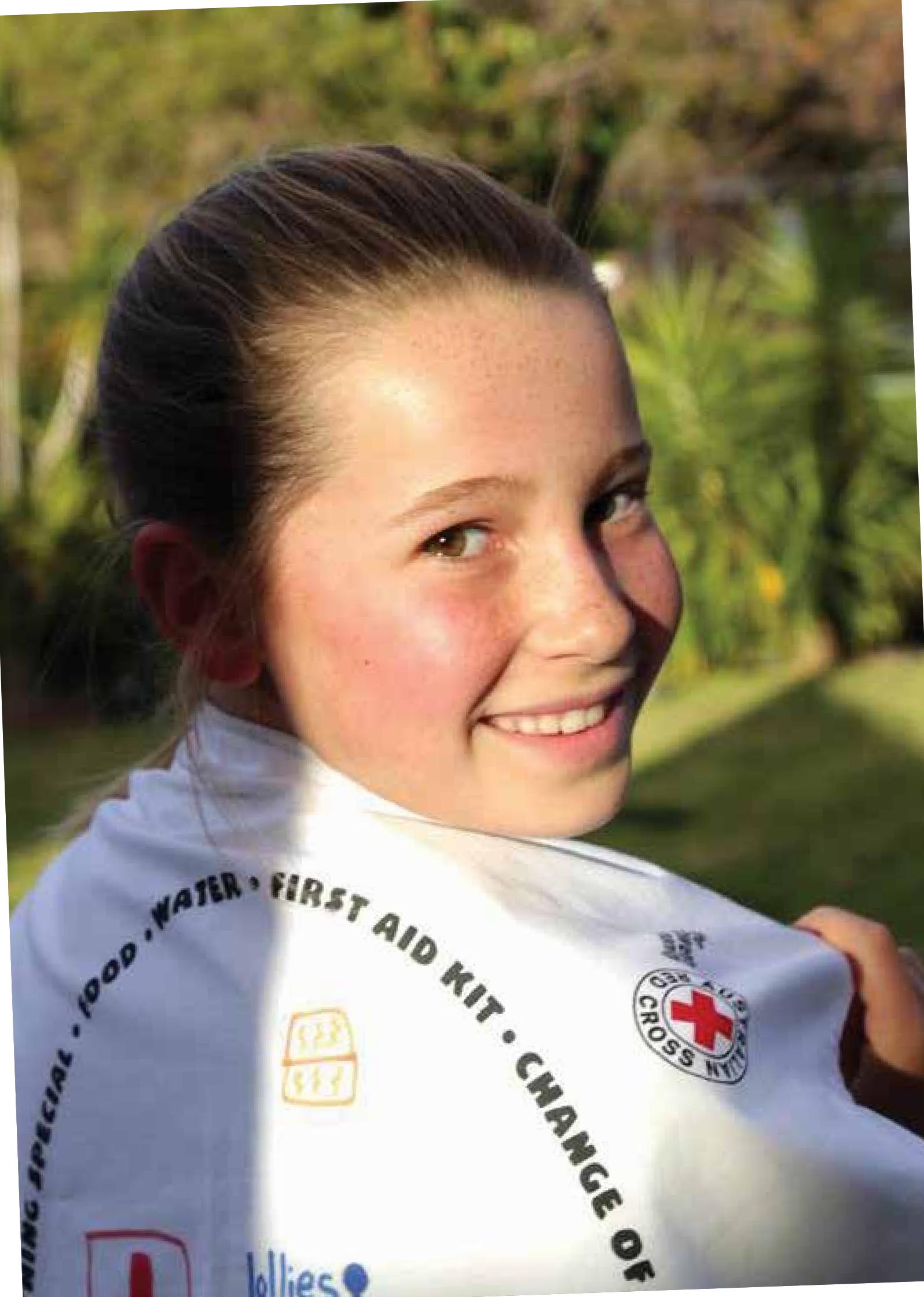
'Modern Slavery' is an umbrella term used to describe a variety of situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom.

Red Cross has an obligation to act on any concerns a person may be experiencing modern slavery. We must also be proactive in addressing any risks of modern slavery in our operations and supply chains.

- › If you are concerned about modern slavery in our operations and supply chain, or that someone may be exposed to modern slavery, report it in Report It, and contact the Support for Trafficked People Program for further support
national_stpp@redcross.org.au
- › To find out more go to the [Modern Slavery Lounge Page](#)

Adapted from, 'PROTECT Identifying and Responding to All Forms of Abuse in Victorian Schools' (DET, 2018)





SPECIAL • 1000 • WATER • FIRST AID KIT • CHANGE OF



lollies

5. Responding to disclosures

A disclosure may come from:

- › a child reporting a concern about a Red Cross person (ie: employee, volunteer, member, supplier, partner or other person or entity within the scope of the Policy)
- › an adult (e.g. a worker or volunteer) reporting a concern about another Red Cross person
- › a child, adult or Red Cross person reporting a concern regarding a parent, carer, or other party external to the organisation.
- › An adult disclosing an incident that occurred when they were a child.

It is essential that all disclosures are taken seriously, reported as per the reporting guidelines in the Handbook and appropriate steps taken to keep the child and other children safe from further harm.

5.1 The importance of taking disclosures seriously

If a child tells you about abuse or safety concerns it must be treated with sensitivity and responded to appropriately. It is important to reflect on the common themes survivors of child abuse told the Royal Commission:

- › Victims felt shame, fear and self-blame, which made it very hard to tell anyone they were being harmed.
- › Children who have experienced or are at risk of experiencing abuse do not tell anyone that an adult is harming them because they do not believe that there is anyone to tell.
- › When victims/survivors of abuse do disclose abuse they report being viewed with suspicion and not being believed.

It is so important that we do not perpetrate these same injustices for children experiencing or at risk of experiencing abuse. We do this by providing a safe environment to

disclose abuse, and very importantly **BELIEVING children when they tell us someone is harming them or they are at risk.**

If a child discloses that they have been, are being, or are in danger of being abused, you must treat the disclosure seriously and take immediate action by following the process set out in this Handbook. Likewise, if another child or adult discloses that they believe another child has been, is being, or is at risk of being abused, you must also treat these disclosures seriously and take immediate action by following the process set out in this Handbook.

5.2 What to do if a child wishes to talk about an experience of abuse?

When a child discloses that they have been abused, it is an opportunity for an adult to provide immediate support and comfort, and to assist in protecting the child from the abuse. It is also a chance to help the child connect to professional services that can help keep the child safe, recover from the trauma, and see those responsible reported to the authorities.

Upon suspicion or disclosure of child abuse, neglect or exploitation, every effort must be made to ensure the on-going safety of the child and any other children who may be considered at risk.

It is important to remember that abuse, neglect or exploitation can take place in a range of settings such as the child's home setting, a community setting or during Red Cross activities.

The safety and wellbeing of the child is the primary concern and it is imperative that adults maintain a child focus, focusing on the child's needs and the effect of actions and behaviours on the child, regardless of intent.

Having a child reveal that they are being, or have been, abused can be confronting and upsetting. The following will help you in having these conversations.



1. If a child shares an experience of abuse with you, you should adopt the following techniques to ensure you respond appropriately.

- › Listen carefully to the child.
- › Let the child talk about their concerns in their own time and in their own words.
- › Give them your full attention, the time and a quiet space in which to do this.
- › Tell the child that you believe them.
- › Reassure the child that the abuse is not their fault.
- › Tell the child that they have done the right thing by telling you.
- › Let the child know that you will act on this information, that you will need to let other people know and explain why you need to let other people know.
- › Do not make promises that you cannot keep, such as promising that you will not tell anyone
- › Ask open ended questions, such as 'can you tell me more about that?'
- › Never push the child into giving additional details of the abuse
- › Do not ask leading questions or attempt to investigate what has been said.
- › Alert relevant people in Red Cross and externally (i.e.: police, statutory child protection) as per reporting process.
- › Take steps to ensure the child is safe.

2. If a child discloses to you it is important that you minimise the risk of contamination of evidence. Report suspected abuse promptly as per Red Cross reporting process. Good recording and reporting practice involves:

- › Recording the child's disclosure in the child's words.
 - › Noting what you observed, their appearance and demeanor.
 - › Documenting any other evidence, reported concerns, or observations.
 - › If the matter is likely to involve a police or statutory child protection investigation, seek immediate support from your manager, Legal and the Practice and Safeguarding Team to ensure next steps taken do not compromise the investigation
 - › If an allegation relates to a Red Cross person, it is essential that the relevant Director(s), National Manager Child Protection, Safeguarding and Practice, and Legal Counsel are immediately advised (within 24 hours), so as to ensure the legislated reporting and investigation processes for that jurisdiction are correctly followed.
 - › Report the disclosure as per reporting process, including to Red Cross people and external agencies such as child protection and police.
 - › If the abuse is not related to the parents/family, contact them, as soon as it is deemed appropriate, and let them know what Red Cross is doing such as reporting or participation in an investigation process.
 - › If appropriate assist the child and their family to access support.
- 





Reasonable grounds

In order to make a report of child abuse, neglect or exploitation to statutory child protection authorities, you are only required to have suspicions or concerns that a child has been harmed or is at risk of harm based on reasonable grounds.

Reasonable grounds may mean that that:

- › a child disclosed harm, or risk of harm (a child tells a Red Cross person of the abuse)
- › a child displays behaviour or injuries that lead to the suspicion that child abuse, neglect or exploitation is occurring/has occurred or is at risk of occurring
- › a child informs a Red Cross person that they know someone who has been harmed, or is likely to be harmed
- › a third party informs a Red Cross person of the alleged/suspected abuse or neglect, or risk of harm.

Red Cross people do not require proof or evidence in addition to reasonable grounds. It is up to the governmental authorities to investigate reports.

6. Reporting

Numerous inquiries and Royal Commissions into child protection have highlighted that, most often, children were let down and left unsafe when organisations failed to implement effective reporting and response procedures. One of the greatest tragedies in the history of child safety in Australia has been a failure of organisations to appropriately record and respond to child abuse.

In Australia, once you have reasonable grounds to suspect that abuse, neglect or exploitation has occurred, or that there is a risk of it occurring, you need to make a report. You may be bound to make an external report to statutory child protection authorities under mandatory reporting legislation, or you may make a voluntary external report.

Red Cross has a zero tolerance policy when it comes to child abuse, neglect and exploitation. If you have child safety or wellbeing concerns, you MUST report it internally, even if not reporting externally. Child safety is paramount. It is essential that we appropriately respond, report and record any instances or concerns of child abuse or neglect, as well as near misses, policy breaches or safeguarding process failures. This is every Red Cross person's responsibility.

There are compulsory internal reporting requirements and different external reporting requirements, depending on what you are reporting and where it occurred. This section sets out the different requirements for reporting.

ABUSE BY ONE CHILD AGAINST ANOTHER

If a child discloses abuse by another child, this must also be reported. Abuse of one child by another is to be assessed against relevant state and territory legislation and requirements of mandatory reporting, and all necessary steps taken to ensure the best interests of the children involved.

6.1 Internal reporting

All child safety and wellbeing concerns MUST be reported internally through [Report It](#), Red Cross' whole of organisation incident management system (except when reporting anonymously under the [Whistleblower Policy](#)).

This includes, any child safeguarding concern or incident, any breach of the Child Safe Code of Conduct or Child Safety and Wellbeing Policy, and any report made to a statutory Child Protection agency. The threshold for internal reporting is lower than the threshold for external reporting.

Report It captures relevant information and documents in relation to the incident, allows follow up actions to be tracked, and facilitates management and oversight of the incident by Line Managers and key Child Safety roles.

The Report It Incident Number should be referenced in the client's case file (CCM).

For more guidance see the [Guide to Reporting Child Safety and Wellbeing Concerns in Report It](#) and the [Child Protection Lounge Incident Reporting Page](#).

If you wish to make an internal report anonymously, do not use Report It. You should instead contact [STOPline](#) on 1300 30 45 50 to make a report as per the [Whistleblower Policy](#).

6.2 External reporting

Depending on the nature of the concern, different types of external reporting will be required. This section outlines when you are required to undertake:

- I. Mandatory reporting
- II. Voluntary reporting
- III. Contractual reporting
- IV. Reportable Conduct and other legislated reporting

I) MANDATORY REPORTING

Mandatory reporting of child abuse, neglect and exploitation refers to legal regimes that require people and/or organisations to report to statutory child protection and other relevant agencies when a certain set of circumstances arises. Mandatory reporting laws are a strategy to address the often-hidden nature of child abuse, neglect and exploitation to enable early detection of cases that otherwise may not come to the attention of authorities. These laws help to create a culture that is more child-focused.

Depending on what you know, or (on reasonable grounds) suspect has happened, you may be required to report the matter to the relevant statutory child protection agency. Statutory child protection agencies are the government departments in Australia (or overseas) responsible for investigating child abuse, neglect and exploitation, and ensuring that children are safe.

Mandatory reporting legislation varies across different states, territories and overseas jurisdictions. Mandatory reporting sometimes only applies to certain professions, and certain types of harm to a child. Some jurisdictions make it a criminal offence not to report to the relevant agency, while in others non-reporting may incur a fine.

It is essential that Line Managers, Child Safety Leads, Child Safe Contact Officers and P&C are familiar with applicable laws in their jurisdiction to ensure that Red Cross People are aware of their obligations. For information about whether you are a mandated reporter in your jurisdiction, speak to your Line Manager, your Child Safety Lead, and visit the local statutory child protection authority’s webpage.

Regardless of jurisdictional differences, it is Red Cross Policy to report to the relevant agency whenever it is in the best interests of the child to do so, as well as when it is required under legislation or contractual obligations. All reports help agencies piece together the likelihood and severity of harm to a child and help ensure appropriate support can be provided.

In Australia, all State and Territory statutory child protection agencies have reporting facilities, which operate 24 hours a day, every day of the year. For details of contacts in each jurisdiction go to the [AIFS website](#). Other countries may have similar facilities.

Some statutory child protection agencies provide reporting guides (often called a Mandatory Reporter Guide or Decision Tree) which may guide you as to whether you should report. Even if the guidelines do not advise to report, still report if you feel it is the best interests of the child to do so.

Legislation regarding mandatory reporting

The table below sets out some of the key pieces of legislation governing the approaches in all Australian States and Territories in relation to mandatory reporting:

Jurisdiction	Legislation
ACT	Children and Young People Act 2008 (ACT) Ombudsman Act 1989 (ACT)
NSW	Children and Young Persons (Care and Protection) Act 1998 (NSW) Crimes Act 1900 (NSW) (refer to section 316) Children’s Guardian Act 2019 (NSW)
NT	Care and Protection of Children Act 2007 (NT) Domestic and Family Violence Act 2007 (NT)
QLD	Child Protection Act 1999 (QLD) Education (General Provisions) Act 2006 (QLD)

SA	Children’s Protection Act 1993 (SA)
TAS	Children, Young Persons and Their Families Act 1997 (TAS)
VIC	Crimes Act 1958 (VIC) Children, Youth and Families Act 2005 (VIC) Child Wellbeing and Safety Act 2005 (VIC)
WA	Children and Community Services Act 2004 (WA)
Commonwealth	Family Law Act 1975 (Cth) (refer to sections 4 and 67ZA)

II) VOLUNTARY REPORTING

Mandatory reporting only applies to certain professions, and certain types of harm to a child. Often Red Cross people will come across information that does not fall within the mandatory reporting regime but should nonetheless be reported to the statutory authority (not as a legal but as an ethical requirement). Red Cross has therefore adopted an approach where we do not only report child abuse, neglect and exploitation when it falls within the mandated categories, instead we consider child safety and wellbeing in a broader context and report where we decide that it is in the best interest of the child to do so. Red Cross people are strongly advised to report to the local statutory child protection agency to support the safety and wellbeing of the child and to support access to services. Voluntary reporting may be critical to identifying a pattern of cumulative or escalating harm even if the harm incident itself does not reach the threshold for reporting.

Legislation allows anyone who is concerned about a child’s wellbeing or safety to voluntarily make a report to statutory child protection in order to keep children safe and well. When reports to statutory child protection or other authorities are made on reasonable grounds and in good faith, the person reporting is legally protected and will not be in breach of professional etiquette, ethics, confidentiality or privacy.

III) CONTRACTUAL REPORTING

In some cases, Red Cross has additional reporting requirements under the terms of contracts for services (e.g. with the Department of Immigration and Border Protection; Department of Foreign Affairs and Trade; Department of Social Services). Please speak to your Line Manager to determine if you are required to report incidents to the program funder and how this reporting should occur.

IV) REPORTABLE CONDUCT AND OTHER LEGISLATED REPORTING

Some States and Territories and overseas jurisdictions may have additional legislated reporting requirements such as

Failure to Report/Protect Legislation and Reportable Conduct Schemes. For example, in NSW there is a reporting requirement to notify the NSW Children's Guardian within 30 days of becoming aware of an allegation regarding a Red Cross person, and to any reportable allegations related to Residential Care Workers into the Residential Care Worker Register. Knowledge and implementation of the applicable reporting obligations is the responsibility of the manager of the specific service. Ask your Line Manager if you are unsure whether you have additional reporting requirements.

If an allegation relates to a Red Cross person, it is essential that the relevant State/Territory/National Director(s), People and Culture Manager, National Manager Child Protection, Safeguarding and Practice, and Legal Counsel are immediately advised (within 24 hours) so as to ensure the legislated reporting and investigation processes for that jurisdiction are correctly followed.

6.3 Line Manager responsibilities - incident reporting

Line Managers have a range of responsibilities throughout the reporting process. They are responsible for:

- Consulting with the person making the report, seeking specialist advice if required from the S/T Child Safety Lead, the National Practice and Safeguarding Team and other relevant teams including Hubs, People and Culture
- Determining the external reporting requirements including contractual obligations to report to funders and any additional legislative requirements that may apply (e.g. Reportable Conduct, Residential Register)
- Supporting the person making the report with undertaking external and internal reporting processes to ensure quality and consistency of reporting
- Upon receipt of an incident report through Report It, review the information contained in the report for appropriateness and quality management of the incident (i.e.: have they made the appropriate external reports, is the harm type correct, have we appropriately considered and supported the child's immediate safety).
- Escalating the incident as required (to National Manager Child Protection, Safeguarding and Practice, S/T Director, P&C, Hub, Risk, IT, Legal, relevant others)
- Recording any advice, comments or feedback on the incident through the use of the 'Workflow Comments' function in Report It
- Determine any further actions to be completed for the incident and allocate through the 'Actions' function in [Report It](#)
- Ensuring all further actions are undertaken in a timely manner, seeking additional support and advice as required
- Closing the incident once satisfied the incident has been properly managed.

- Ensuring appropriate supports and debriefing is in place for the person making the report.

For further information in relation to incident management and Line Manager Responsibilities in Report It please refer to the [Report It section of the WHS Work Health & Safety Lounge Page](#) and [Child Protection Lounge Page](#).

If you require support with your obligations as per this Handbook, speak to your Manager, Child Safety Lead, or contact the Practice and Safeguarding Team by emailing safeguarding@redcross.org.au

Some situations may be highly complex or involve ethical dilemmas (e.g. keeping client information confidential versus child safety). It is important that if you need additional support you speak to the Practice and Safeguarding Team to navigate this complex 'grey' area which is child safeguarding.



Remember. If an allegation relates to a Red Cross person, it is essential that the relevant Director(s), People and Culture Manager, National Manager Child Protection, Safeguarding and Practice, and Legal Counsel are immediately advised (within 24 hours) so as to ensure the legislated reporting and investigation processes for that jurisdiction are correctly followed.

6.4 Supplier reporting processes and support

Where a supplier (contractor, sole trader, sub-contractor, or personnel of a contractor) is required to apply the Red Cross Child Safety and Wellbeing Policy under their contract with Red Cross, the reporting requirements are the same as if they were a Red Cross person. They are also required to follow any reporting procedures they may have within their own organisation.

They should notify and seek advice from their Red Cross contact person for support through the reporting process.

If they have lodged a report to an external statutory child protection authority, they should notify their Red Cross contact person. If the matter relates to their Red Cross contact person, they can contact Stopline or the National Manager Child Protection, Safeguarding and Practice.

If a supplier (contractor, sole trader, sub-contractor or personnel of a contractor) is not required to apply the Red Cross Child Safety and Wellbeing Policy as detailed in their contract with Red Cross, they should follow any reporting

procedures they may have within their own organisation. They may consult and seek advice from their Red Cross contact person at any stage during the reporting process, and should ensure key Red Cross people are aware if their concern relates to a Red Cross person such that appropriate action can be taken. In addition, any person who has a reasonable concern that a Red Cross person may not be acting ethically or in accordance with laws or other obligations may raise a concern by contacting [STOPline](#) on 1300 30 45 50.

Remember. If you have concerns a child is being or is at risk of being abused, neglected or exploited, even if your role is not mandated by law to make a report to a child protection authority, it may be considered by Red Cross in the child's best interests to report the concerns to support the safety and wellbeing of the child.

Identifying and reporting child abuse, neglect and exploitation is often complex, challenging and confronting. If you are unsure about what you have seen or heard, or whether to report internally or externally, promptly talk to your Line Manager, Child Safety Lead or the Practice and Safeguarding Team.

6.5 Reporting outside Australia

All reporting obligations under the Child Safety and Wellbeing Policy and Code of Conduct apply to any person, program, or activity associated with International Programs, onshore and offshore. All child safety and wellbeing concerns MUST be reported internally to the Line Manager and through Report It in accordance with the International Programs Reporting Flowchart available in the [International Programs Child Protection Risks and Tools Folder in PIMS](#). In some circumstances, additional reporting requirements may be required. Please ensure you speak to your Line Manager and/or the IP Safeguarding and PSEAH Adviser to see if additional reporting requirements apply to you.

As a Department of Foreign Affairs and Trade (DFAT) Funded Partner, Australian Red Cross has an obligation to act in accordance with the DFAT Child Protection Policy. The IP Safeguarding and PSEAH Adviser will immediately report any suspected, actual, or disclosed instances of child abuse, neglect, or exploitation, or Child Safety and Wellbeing Policy and Code of Conduct non-compliance to DFAT.

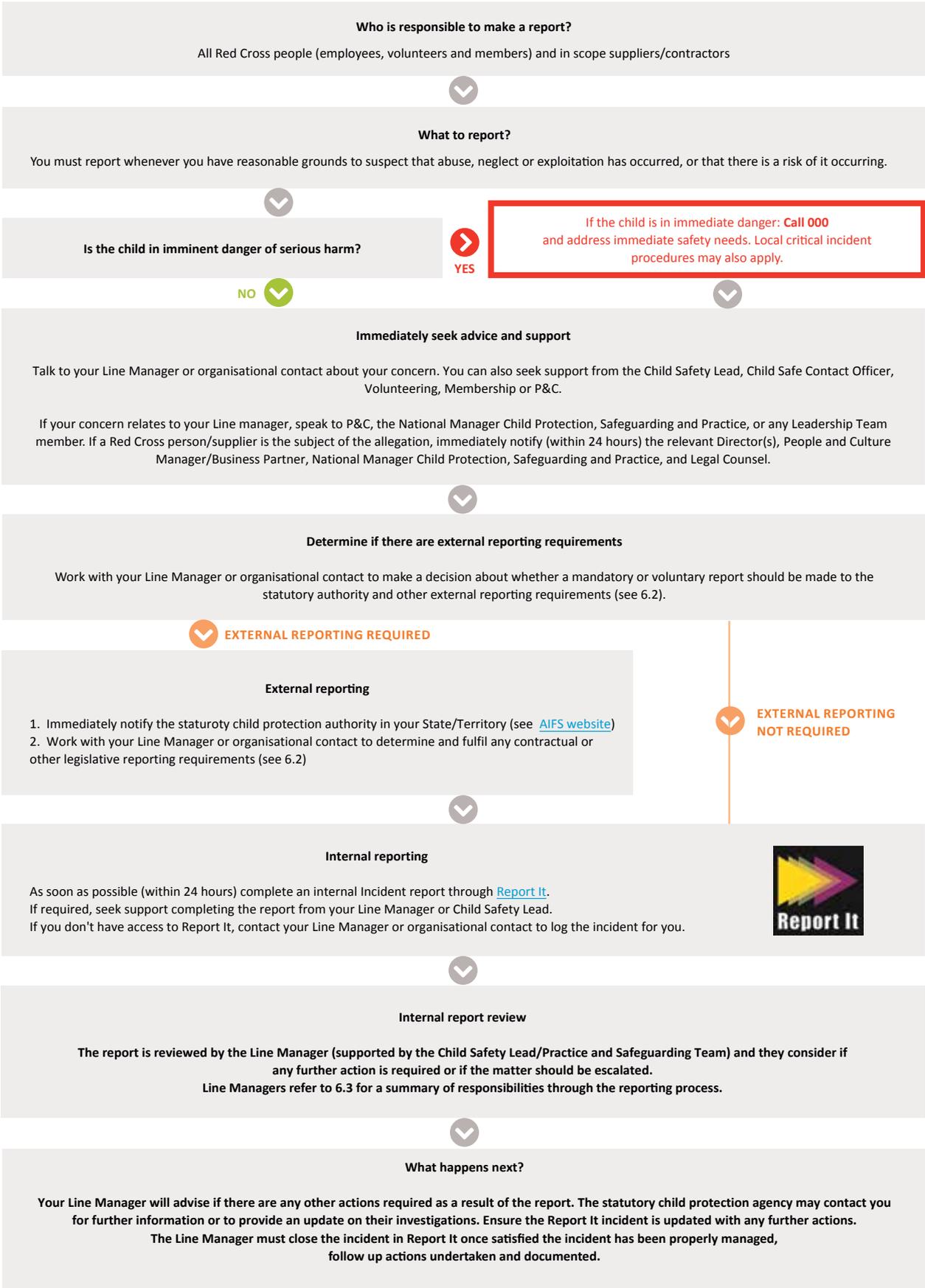
Points to remember when reporting child safety and wellbeing concerns:

- › If you have formed a suspicion on reasonable grounds, you should take action and report that concern. Trust your judgement and don't ignore concerns
- › If acting in good faith you cannot incur civil or criminal liability. You are not breaching professional etiquette, ethics, confidentiality or privacy by making a report when obliged to by law or Red Cross policy
- › It is not the role of Red Cross people to investigate and decide whether harm has occurred. That is the role of the relevant authority and legal system. (Note: an internal investigation may be required for allegations regarding a Red Cross person or supplier as detailed in Chapter 7).
- › Before making a report prepare a clear and accurate summary of the concerns regarding child safety. This should include things such as a statement of your observations, exact quotes and/or details of any disclosure or allegation
- › You aren't expected to make decisions alone. Your Line Manager, Child Safety Lead and the Practice and Safeguarding Team are there to support you
- › You cannot be directed not to make a report when you believe it is in the best interests of a child to make a report
- › If you require additional support during this time, you can contact the Employee Assistance Program

6.6 How to make a report in Australia

The following flow chart will guide you through how you must report an incident or suspicion of abuse that occurs in Australia. All Red Cross people and suppliers/contractors/sole traders have a responsibility to follow the reporting requirements set out below.

Australian domestic child safety and wellbeing concern reporting process



Who is responsible to make a report?

All Red Cross people (employees, volunteers and members) and in scope suppliers/contractors



What to report?

You must report whenever you have reasonable grounds to suspect that abuse, neglect or exploitation has occurred, or that there is a risk of it occurring.



Is the child in imminent danger of serious harm?



If the child is in immediate danger: Call 000 and address immediate safety needs. Local critical incident procedures may also apply.



Immediately seek advice and support

Talk to your Line Manager or organisational contact about your concern. You can also seek support from the Child Safety Lead, Child Safe Contact Officer, Volunteering, Membership or P&C.

If your concern relates to your Line manager, speak to P&C, the National Manager Child Protection, Safeguarding and Practice, or any Leadership Team member. If a Red Cross person/supplier is the subject of the allegation, immediately notify (within 24 hours) the relevant Director(s), People and Culture Manager/Business Partner, National Manager Child Protection, Safeguarding and Practice, and Legal Counsel.



Determine if there are external reporting requirements

Work with your Line Manager or organisational contact to make a decision about whether a mandatory or voluntary report should be made to the statutory authority and other external reporting requirements (see 6.2).



External reporting

1. Immediately notify the statutory child protection authority in your State/Territory (see [AIFS website](#))
2. Work with your Line Manager or organisational contact to determine and fulfil any contractual or other legislative reporting requirements (see 6.2)



EXTERNAL REPORTING NOT REQUIRED

Internal reporting

As soon as possible (within 24 hours) complete an internal Incident report through [Report It](#). If required, seek support completing the report from your Line Manager or Child Safety Lead. If you don't have access to Report It, contact your Line Manager or organisational contact to log the incident for you.



Internal report review

The report is reviewed by the Line Manager (supported by the Child Safety Lead/Practice and Safeguarding Team) and they consider if any further action is required or if the matter should be escalated. Line Managers refer to 6.3 for a summary of responsibilities through the reporting process.



What happens next?

Your Line Manager will advise if there are any other actions required as a result of the report. The statutory child protection agency may contact you for further information or to provide an update on their investigations. Ensure the Report It incident is updated with any further actions. The Line Manager must close the incident in Report It once satisfied the incident has been properly managed, follow up actions undertaken and documented.



7. Investigation and disciplinary action

The majority of child safeguarding concerns will relate to a family engaged with Red Cross services, where the subject of the allegation is external to Red Cross. In these instances, it is important to remember your role is not to investigate the allegations, as that is the responsibility of the relevant agencies (police, statutory child protection).

Your response should be informed by good practice, involving your Line Manager, and if needed your Child Safety Lead and the Practice and Safeguarding Team, under the guidance of the relevant agencies to support the best outcome for the child. When another child is believed responsible for causing harm, it is again important to follow the appropriate response and reporting processes for your jurisdiction under the guidance of the relevant agencies.

Where there has been a breach of the Child Safe Code of Conduct, Child Safety and Wellbeing Policy or Handbook by a Red Cross person/supplier, or a Red Cross person/supplier is the subject of an allegation of harm to a child, an investigation must be conducted. This process must at all times prioritise the safety and wellbeing of children. This process must not interfere with the investigations of police and statutory child protection, and should be done under the guidance of P&C, the National Manager Child Protection, Safeguarding and Practice, Legal Counsel, and the relevant external agencies if involved (child protection, police, DFAT, NSW OCG etc.).

It is important that parents/guardians are informed and engaged as the person responsible for the child. Where the involvement of parents/guardians poses a potential risk to the child or investigation process, an alternative legal guardian/carer must be identified and appropriately involved. It is important Red Cross not take on an inappropriate role as decision maker on behalf of the child, as there are legislative frameworks to ensure this responsibility is undertaken appropriately where the parent or legal guardian is unable to do so.

7.1 Obligation to act fairly

The child who has been allegedly harmed, or is at risk of harm, and the person believed responsible must be dealt with respectfully and fairly. They must be treated in

accordance with all relevant Red Cross policies (to the extent applicable in the circumstances) and their right to procedural fairness must be respected.

7.2 Immediate Actions and Risk Management

Immediately upon becoming aware of a potential allegation, an urgent meeting must be called by the relevant Line Manager (or Red Cross contact) with the relevant Director(s), National Manager Child Protection, Safeguarding and Practice, P&C and appropriate others (e.g. Legal Counsel, Risk, DAB Chair/President of the Board, Volunteer Hub) to determine the required next steps.

Prior to commencing any investigation a risk management plan must be developed. The risk management plan is the responsibility of the Line Manager/Contract Manager or other delegated party, and must be stored in Report It and only communicated to the relevant parties.

The risk assessment must identify and minimise/prevent risks to:

- > the child(ren) who are the subject of the allegation
- > other children who may have contact with the person against whom the allegation has been made
- > the person against whom the allegation has been made
- > Red Cross, and;
- > the proper investigation of the allegation

7.3 How an internal investigation will be conducted

The following section outlines how an internal Red Cross investigation will be conducted if a Red Cross person (employee member, volunteer, member) or supplier (inc contractors, sole traders, sub-contractors, or personnel of contractor) is the subject of an allegation or has allegedly breached the Child Safe Code of Conduct, Child Safety and Wellbeing Policy, or the Handbook. The outcome of an internal investigation is not dependent upon or tied to external investigation conducted by other organisations or government authorities. Red Cross may independently determine an appropriate course of action including termination of employment, contract, membership or service.

Internal investigation process

An investigation will be conducted as per the process set out in the Red Cross Grievance Policy and Procedure (in accordance with the contract between Red Cross and the supplier if relevant).

An immediate meeting will be called by the relevant Line Manager (or Red Cross contact) with the relevant Director(s), National Manager Child Protection, Practice and Safeguarding, People and Culture Manager and appropriate other people involved/required.

The outcome of this meeting is to identify next steps, roles and responsibilities, external reporting requirements (see 6.2), whether an external investigator should be appointed with expertise in child interviews and child investigations, and to consult on the risk management plan to manage risks during the investigation (including for membership matters if the appointment of a 3 person panel is appropriate, as per the **Divisional Regulations**).

The risk assessment is the responsibility of the Line Manager/Contract Manager or other delegated party, must be stored in Report It and communicated to the relevant parties.

Once deemed appropriate (after liaising with relevant statutory agencies, if required), the relevant Director(s), P&C Manager or their delegate will inform the person against whom the allegation has been made that allegations have been reported and are being investigated and, if applicable, that the appropriate government agencies (e.g. statutory child protection, police, Children's Guardians, Commissioners and Advocates, funders) have been informed.

Support for the person against whom the allegation has been made must be provided as per the Red Cross Grievance Policy and Procedure and (for members only) the Divisional Regulations of Red Cross.



Applicable policies and procedures

- > **Child Safety and Wellbeing Policy**
- > **Child Safe Code of Conduct**
- > **Feedback, Complaints and Concerns Policy**
- > **Grievance Policy and Procedure**
- > Process for Investigation of a Complaint or Grievance
- > **Disciplinary Policy**
- > **Whistleblower policy**
- > **Divisional Regulations** (members only)

Suppliers only:

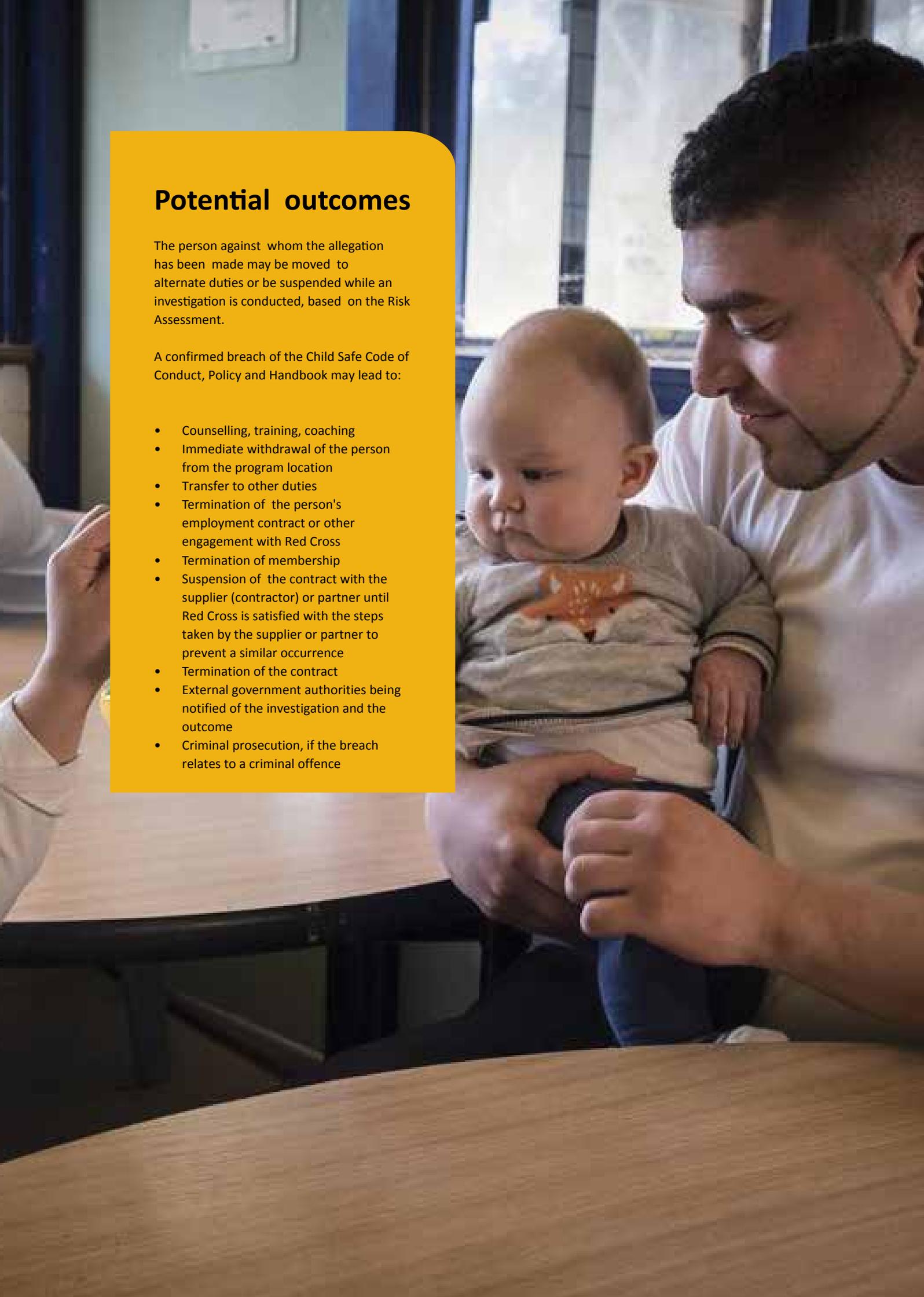
- > Contract with Red Cross
- > **See also Managing Contractors page on the Lounge**

Potential outcomes

The person against whom the allegation has been made may be moved to alternate duties or be suspended while an investigation is conducted, based on the Risk Assessment.

A confirmed breach of the Child Safe Code of Conduct, Policy and Handbook may lead to:

- Counselling, training, coaching
- Immediate withdrawal of the person from the program location
- Transfer to other duties
- Termination of the person's employment contract or other engagement with Red Cross
- Termination of membership
- Suspension of the contract with the supplier (contractor) or partner until Red Cross is satisfied with the steps taken by the supplier or partner to prevent a similar occurrence
- Termination of the contract
- External government authorities being notified of the investigation and the outcome
- Criminal prosecution, if the breach relates to a criminal offence





8. Information sharing, privacy and record keeping

8.1 What is information sharing?

As a general rule, personal information that is held by Red Cross is protected by privacy law and may only be used or disclosed in compliance with privacy law. However, governmental agencies, non-government agencies, contractors and service providers (such as Red Cross) should, and are often required under legislation to, share relevant information where there is a risk to the safety or wellbeing of a child. A common finding in coronial and child death reviews is that poor information sharing between different service providers is a barrier to keeping children safe.

Agencies that deliver services to families are often collecting partial information primarily relating to their area of expertise or focus. Not sharing information between agencies can therefore lead to gaps in the flow of information, and particularly in child protection cases it is likely to lead to gaps in safety and wellbeing assessments for children.

Red Cross will share (use or disclose) personal information if requested, or when Red Cross holds the belief that it is important to do so to increase the safety of a child, under the following circumstances:

- › where using or disclosing personal information as required is authorised by law, e.g. the Children Legislation Amendment (Information Sharing) Act 2018 (Vic)
- › where Red Cross receives a subpoena or a search warrant
- › where a request is received by a statutory child protection agency in writing citing a section of their act (e.g. section 16A in Children and Young Persons (Care and Protection) Act 1998 (NSW)) – if in doubt contact the National Manager Child Protection, Safeguarding and Practice, and Legal Counsel
- › where consent to share personal information in the best interest of the child was given at the time of collection of the information (refer to collection notice of the program, see if it allows Red Cross to pass on the collected information, and if so to whom)
- › where the assessment is such that disclosure falls within an exception of privacy law
- › where a permitted general situation exists: For example, lessening or preventing a serious threat to life, health or safety. Red Cross may share information where:
 - o it is unreasonable or impracticable to obtain the individual's consent to the use or disclosure, and;
 - o Red Cross has reasonable grounds that the use or

disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety

- › Other situations: In some cases Red Cross may be asked to share information in circumstances that do not fit into one of the above categories – if in doubt contact the National Manager Child Protection, Safeguarding and Practice and Legal.

If as a Red Cross person you are of the view that it is in the best interest of the child to disclose information, or share requested information, you must contact your Line Manager, the National Manager Child Protection, Safeguarding and Practice, and Legal so that the facts can be assessed on a case-by-case basis. The outcome will depend on the circumstances, purpose for the sharing of information, whether consent can be sought and other factors.

Sharing information without consent or without falling within one of the above exemptions to privacy law may in rare cases be ethically right but carry a risk to the organisation. In this situation, you must not share information unless doing so has been approved by your Line Manager, the National Manager Child Protection, Safeguarding and Practice and relevant Director(s) under the advice of Legal Counsel.

8.2 Record keeping and file sharing

All client information should be recorded in the appropriate Red Cross system, such as CCM. Client information should not be stored on individual systems or devices as these are more vulnerable to data breaches. Additional care must be taken to secure any records if extracted from Red Cross systems and must be stored temporarily within Red Cross environment only. When sharing confidential client information a secure encrypted system such as [ShareSafe](#), available in MyApps, must be used. Do not email client files, as unencrypted email is vulnerable to data breaches.

Any database with children's information must have appropriate access restrictions to ensure only approved personnel are accessing records.

For more information around best practice in keeping our information secure go to the [Trust Initiative Page on the Lounge](#).

8.3 What to do if there is a privacy breach?

If you are concerned you may have shared information inappropriately, or become aware of a potential privacy breach, report the incident immediately to your line manager and in [Report It](#), and [raise a security concern by logging a job with IT](#). IT security will be in touch to help you manage the incident.

8.4 Requirement to retain records indefinitely

Organisations like Red Cross are required under a freeze order to not dispose of documents relating to children, so that evidence needed by claimants for legal actions is not lost or destroyed. It is essential that all records relating to children are appropriately stored and retained indefinitely:

- › Hard copy records should be secured separately from other records, clearly marked with the name of the funder, the general services provided, the geographic area in which they are provided, and any other information sufficient to enable someone to identify them if individual clients ask for them, and archived securely with vendors such as Iron Mountain.
- › Records held in CCM are retained indefinitely. All client information should be migrated to CCM as soon as practical.
- › Report It information will be retained indefinitely by Intalex and must not be deleted.
- › No client information should be stored on office provided and/or personal laptops/ desktops or other devices. All client records must remain on designated Red Cross systems.
- › Client records should not be stored on File Share and/or SharePoint.
- › Emails are not searchable and it is very difficult to manage indefinite retention of data. Therefore, client records should not be shared or stored on Email. Emails containing client information should be deleted within an agreed period.
- › No client information should be stored or collected on OneDrive and/ or other On-line Storage services/ platforms such as Google Docs, DropBox etc.

If you have questions or concerns about when best to destroy records, contact Legal Counsel.





Definitions

Adult	A person aged 18 years or more.	Child exploitation	Using a child for profit, unlawful labour, sexual gratification, or some other personal or financial advantage, including: possessing, controlling, producing, obtaining, transmitting and distributing child abuse material; face to face and online grooming including for the purposes of sexual exploitation, criminal activity or to radicalise to violent extremism; coercing another person to commit an act or acts of exploitation against a child.
Carer or caregiver	A person who has responsibility for a child including: <ul style="list-style-type: none"> > a foster or kinship out of home carer > a Red Cross person in that capacity > a sole trader or contractor in that capacity 	Child pornography	See child abuse material
Child	A person under the age of 18 years.	Child protection	An action or intervention designed to protect an individual child from harm, particularly arising from child abuse. It includes procedures which detail how to respond to concerns about a child.
Child abuse	One or more of the following in relation to a child: <ul style="list-style-type: none"> > physical harm > sexual abuse > emotional harm (includes exposure to domestic and family violence) > neglect <p>Note: the Policy uses the phrase 'child abuse, neglect and exploitation' to refer to the suite of concerns, as some readers may not understand that neglect is a form of child abuse.</p> <p>Note: DFAT also use the term 'ill-treatment'. Behaviour included in this term is sufficiently addressed by 'emotional' and/or 'physical' abuse, noted above.</p>	Child safeguarding	All the actions an organisation, or individuals within the organisation, take to ensure the safety and wellbeing of children engaging with or impacted by the organisation, including strategies to protect children from harm.
Child abuse material	Also known as child exploitation material or child pornography, is material that expressly or implicitly depicts a child or someone who appears to be a child: as victim of torture, cruelty or physical abuse; engaged in a sexual pose or a sexual activity; with their private sexual parts exposed; in the presence of another person that is engaged in a sexual pose or sexual activity. Includes videos, photos, drawings and animations.	Clearance to work with children	See "Working with children clearance" (WWCC)

(Child Safe) Code of Conduct	Australian Red Cross Child Safe Code of Conduct, previously known as the Child Protection Code of Conduct	Grooming	Actions deliberately taken to befriend and influence a child (and/or parents and caregivers) with the objective of exploitation. It may occur in person, over phone or online, over a brief or extended time period.
Contact with children	see "direct contact with children"	Handbook	Australian Red Cross Child Safety and Wellbeing Handbook.
Contractor	See "supplier"	Informed consent	Consent given by a child, parent or guardian with an informed understanding of the implications, purpose and potential uses of photographs or videos.
Direct contact (with a child)	Includes face to face contact and all direct communication including telephone or online (text, voice calls, voice messages, video messages, gaming, social media, video chat etc.). It applies to roles where the contact is reasonably expected to occur as a normal part of the activity or work environment and is more than incidental.	Online grooming	The act of sending an electronic message with indecent content to a recipient who the sender believes to be under 16 years of age, with the intention of procuring the recipient to engage in or submit to sexual activity with another person including but not necessarily the sender; or of sending an electronic message with indecent content to a recipient who the sender believes to be under 16 years of age.
DFAT	Department of Foreign Affairs and Trade (or any subsequent Department of the Australian Government, with responsibility for foreign or external affairs).	Neglect	The continued failure by a parent or caregiver (including those within the scope of this Policy) to provide a child with the basic things needed for his or her proper growth and development, including sufficient attention and responsiveness, items such as food, clothing, shelter, medical and dental care and adequate supervision appropriate to the age and needs of the child.
DFAT Child Protection Policy	DFAT Child Protection Policy 2017, as varied or replaced by DFAT.	Partner organisation	A partner organisation engaged by Red Cross to work with Red Cross or to provide services to or in connection with projects (whether within or outside Australia), including projects that are undertaken with funding provided in whole or in part by DFAT.
Emotional harm	<p>The serious psychological harm that can occur where the behaviour of their parent or caregiver damages the confidence and self-esteem of the child or young person, resulting in serious emotional disturbance or psychological trauma.</p> <p>Although it is possible for 'one-off' incidents to cause serious harm, in general it is the frequency, persistence and duration of the parental or carer behaviour that is instrumental in defining the consequences for the child or young person.</p> <p>This can include a range of behaviours such as excessive criticism, withholding affection, exposure to domestic violence, intimidation or threatening behaviour.</p>	Personnel	An employee or other person providing services.

Physical harm	<p>A non-accidental injury or pattern of injuries to a child or young person caused by a parent, caregiver or any other person. It includes but is not limited to injuries which are caused by excessive discipline, severe beatings or shakings, cigarette burns, attempted strangulation and female genital mutilation. Injuries include bruising, lacerations or welts, burns, fractures or dislocation of joints.</p> <p>Note: In relation to 'excessive discipline', hitting a child or young person around the head or neck and/or using a stick, belt or other object to discipline or punish a child or young person (in a non-trivial way) is a crime in some states.</p>	Supplier	Sometimes referred to as contractor, includes any organisation or person (other than a Red Cross Person) who provides Red Cross with goods or services, including subcontractors, sole traders, agents, related entities and consultants.
PSEAH	Prevention of Sexual Exploitation, Abuse and Harassment, of anyone, but particularly individuals and communities accessing Red Cross services and support, as outlined in the PSEAH Policy, Client Reportable Incident Policy and Child Safety and Wellbeing Policy.	Unacceptable risk	An identified risk that cannot be tolerated and is not appropriate for use of control mechanisms.
Red Cross	Australian Red Cross Society (ABN 50 169 561 394).	Volunteer	<p>A person who:</p> <ul style="list-style-type: none"> > is a volunteer in accordance with Rule 4 of the Rules of Red Cross or > provides voluntary service with the agreement of Red Cross as defined and required by the Red Cross Volunteer Framework or > provides voluntary service as a member of: <ul style="list-style-type: none"> > the Board of Red Cross > a Committee of the Board > a Divisional Advisory Board > a Committee of a Divisional Advisory Board. <p>A 'volunteer' does not include any person who is a blood donor, organ donor, 'umbilical cord' donor, milk donor or tissue donor with the Australian Red Cross Blood Service.</p>
Red Contact person	The person nominated as the main point of contact for contractors (including sole traders), partners, volunteers and Red Cross members.	Wellbeing (well)	The ability for a child to realise their own potential, or self-agency, to better cope with the normal stresses of life, to live and learn productively and to be an active part of a community.
Red Cross member	A person who is a member of Red Cross in accordance with the Rules of Red Cross.	Work experience student	<p>A student who is engaged in activities of Red Cross as a consequence of participating in a course of formal study, including:</p> <ul style="list-style-type: none"> > a school-based work experience program > a TAFE/University or other accredited educational provider of work experience > a compulsory work placement program > a government labour market work experience program > internships
Red Cross people	Employees and volunteers engaged by Red Cross or a Red Cross member.		
Red Cross person	An employee or volunteer engaged by Red Cross or a Red Cross member.		
Sexual abuse	When someone involves a child in a sexual activity by using their power over them or taking advantage of their trust. Often children or young people are bribed or threatened physically and psychologically to make them participate in the activity.		

<p>Working with children clearance (WWCC)</p> <p>or</p> <p>Clearance to work with children</p>	<p>A pre-employment screening check for people seeking to engage in child related work conducted by the relevant state or territory regulator. It screens applicants' criminal and professional conduct (depending on jurisdiction) and is designed to prevent people who pose an 'unjustifiable risk' to children from working directly with children. Screening checks are applied differently across the country as they are regulated at the State/Territory level.</p> <p>Red Cross requires a WWCC for any person undertaking any role that has direct contact with children. It is Red Cross policy that no Red Cross person in a role requiring a WWCC can commence in their role until the WWCC is completed and they have been cleared (approved to work with children) by the regulator.</p>
--	---

¹(NSW Family and Community Services 15-12-17) <http://www.community.nsw.gov.au/preventing-child-abuse-and-neglect/what-is-child-abuse>.

²(NSW Family and Community Services website 15-12-17) <http://www.community.nsw.gov.au/preventing-child-abuse-and-neglect/what-is-child-abuse>.

References

AHRC (2013). Response to the Royal Commission into Institutional Responses to Child Sexual Abuse: Issue Paper 3. Australian Human Rights Commission (AHRC). <https://www.humanrights.gov.au/submissions/child-safe-institutions#fn8>

AHRC (2019). About the National Principles. Australian Human Rights Commission (AHRC). <https://childsafesafe.humanrights.gov.au/national-principles/about-national-principles>

CFCA (2018). What is child abuse and neglect? CFCA Resource Sheet. Child Family Community Australia (CFCA). Australian Institute of Family Studies.

DET (2018). Protect - Identifying and Responding to All Forms of Abuse in Victorian Schools. Victorian Department of Education and Training (DET).

Moores (2018). Child Safety Tool Kit: How to create a child safe organisation. Moores Pty Ltd and Our Community. https://acfid.asn.au/sites/site.acfid/files/resource_document/child_safety_toolkit_2018.pdf

OCG (2017). Child Safe Risk Management - Child Safe Organisations Resource 3. NSW Office of the Children's Guardian (OCG).

Royal Commission (2015). Interim Report, Volume 1, Chapter 3. Royal Commission into Institutional Responses to Child Sexual Assault (Royal Commission).

UNICEF (2019). Simplified Version of the United Nations Convention on the Rights of the Child. <https://www.unicef.org.au/Upload/UNICEF/Media/Our%20work/childfriendlycrc.pdf>

VCCYP (2018). A Guide for Creating a Child Safe Organisation. Victorian Commission for Children and Young People. <https://ccyp.vic.gov.au/assets/resources/CSSGuideFinalV4-Web-New.pdf>

As part of a commitment to continuous improvement, the Child Safety and Wellbeing Handbook will be reviewed in conjunction with the Child Safety and Wellbeing Policy on a two-yearly basis. Additionally, these documents may be updated throughout the year as required.

Your thoughts, comments and suggestions are welcome via email safeguarding@redcross.org.au





the
power
of
humanity

Keeping children safe and strong in culture

Implementation of the Child Safety and Wellbeing Policy Aboriginal and Torres Strait Islander Workforce

Purpose

This guidance note is designed to support our Aboriginal and Torres Strait Islander staff and volunteers and their line managers in applying the Child Safety and Wellbeing Policy in a way that they feel safe in the community and at work.

In 2014 Aboriginal and Torres Strait Islander children were 7 times more likely than non-Indigenous children to be the subject of substantiated reports of harm/risk of harm (Child protection and Aboriginal and Torres Strait Islander children CFCA Resource Sheet—September 2015).

The Australian Institute of Health and Welfare's December 2015 report on Youth Detention states that across the country, 54 per cent of juvenile detainees between the ages of 10 and 17 are of Aboriginal or Torres Strait Islander descent. On an average night in Australia, 34 in every 10,000 Indigenous young people are in prison, compared to just 1.3 per 10,000 non-Indigenous young people.

Messages from Red Cross people

CHILD SAFETY AND WELLBEING IS HARD

We have heard from the Aboriginal and Torres Strait Islander staff and volunteers that they worry about the Child Safety and Wellbeing Policy as they sometimes find parts of it hard to implement. They worry about making a report when a child is at significant risk of harm from child abuse, especially neglect, as required by the Red Cross policy and child protection laws.

RED CROSS NEEDS TO HELP

They have also told us that they think it is very important that Red Cross actively supports keeping Aboriginal and Torres Strait Islander children safe and well (strong) in its everyday work and advocacy. The rates of child removal continue to increase and the levels of incarceration remain very high. They are worried for their children and feel Red Cross can help keep them safe.

TWO HATS

Where staff/volunteers work and live in the same community they say it is hard for both the community members and themselves to separate their work and family responsibilities and relationships.

THE LEGACY OF THE PAST – TODAY'S REALITY

The long history of discriminative colonisation policies and practice has had a profound impact on culture and daily life. Aboriginal and Torres Strait Islander peoples lack confidence and trust in the government child welfare system.

How Red Cross supports understanding and implementation of the Policy

TRAINING AND RESOURCES

At Red Cross our starting point to support our Aboriginal and Torres Strait Islander staff and volunteers and their team leaders to understand the Policy is through:

- › Information and training on the nature of child abuse and neglect
- › The legal requirements about making a report when children are at serious risk of harm
- › How to support children and families before children become unsafe
- › State/Territory Child Safety Leads and Child Safe Contact Officers roles in many locations to provide support and information
- › [Cultural Ladder Book](#)
- › [Cultural Ladder Training on the Learning Gateway](#)

WHAT ELSE IS HELPFUL?

We heard from the Aboriginal and Torres Strait Islander staff, volunteers and team leaders that the following is helpful:

- › Knowing and trusting a Child Safe Contact Officer or team leader who they can ask for help
- › Talking with their Team Leader about what support they can provide them
- › Having a senior support person who lives outside of the community who can support them make a notification
- › Planning how to differentiate when they are acting on behalf of Red Cross and when they are acting as a member of the community
- › Building respectful relationships with the local community leaders and service providers
- › Learning about how the local statutory child protection system works

WHAT CAN I DO?

It can be helpful to develop a plan about how you will keep yourself safe and strong in case you need to make a report. Talking about the following with a colleague, team leader, Child Safety Lead or Child Safe Contact Officer may help. You can then develop your own staying safe plan.

- › If I am worried about a child who will I feel safe to talk to
- › What support is available to me in my team
- › How will I keep myself safe emotionally and physically
- › How do I negotiate with and communicate to the community when I am acting on behalf of Red Cross
- › How can I actively promote keeping children strong
- › Have a look at and talk about information provided and resources available
- › Ask your team leader what relationships they have developed to support child safety conversations and actions
- › Share your knowledge of the community and their strengths in keeping children strong
- › Knowing who to contact in an emergency.

HOW CAN TEAM LEADERS AND OTHERS HELP?

- › Discuss the Fundamental Principles and Ways of Working and how they could help you with your two hats
- › Identify a 'go to person' in Aboriginal and Torres Strait Islander communities who may be able to assist and support any reporting that may have to be made
- › Include this information as part of the local introduction to the community and include in the community profile
- › Encourage Red Cross people to consult with the Team Leader and the 'go to person' before making a report
- › Include our partners in active conversations on child safety and design ways to work together
- › Sharing concerns for children's safety is an effective way for NGOs working together to assist and support families – understand what legal provisions in your area of work support effective information sharing
- › Facilitate on-the job mentoring and coaching

'Red Cross has gained enormous respect in Aboriginal and Torres Strait Islander communities because of things like our child protection policy and this will be strengthened even more if we consider input and knowledge from the communities we work in and the partners we work with.'

Jenny Dally Regional Manager Darwin NT

Resources

There are a number of resources that may be helpful for you in planning how to help keep children strong:

- › [Family Matters website](#)
- › [SNAICC website, includes resources and links to each State/ Territory peak body](#)
- › [Red Cross Child Protection Lounge Page](#)
- › [Aboriginal and Torres Strait Islander Strategy in Action Lounge page](#)



FOR ASSISTANCE, FEEDBACK AND INFORMATION PLEASE CONTACT:

Practice and Safeguarding Team
safeguarding@redcross.org.au

Jenny Brown, National Lead - Aboriginal and Torres Strait Islander Engagement
jebrown@redcross.org.au



the
power of
humanity

The use and storage of children's images guidelines

Purpose

These guidelines are an annexure to the Australian Red Cross [Photographic Images and Digital Resources Policy](#), [Child Safety and Wellbeing Policy](#), [Handbook](#) and [Child Safe Code of Conduct](#)

What are the risks to children when using their images?

The use of images on websites, social media and in other publications poses direct and indirect risks to children and young people. Even if the child's personal identity (full name, address) is kept confidential, other details accompanying the image such as an organisation or school name may make them identifiable and therefore vulnerable to individuals looking to 'groom' children for abuse.

There is also a risk the image itself may be used inappropriately by others. The internet is a vast, unregulated space and images may be taken and used in other contexts that are not in the best interests of children.

When photographing or filming a child or using children's images, Red Cross will:

- > Assess and endeavor to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child
- > Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child including explaining how the photograph or film will be used
- > Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in an inappropriate, degrading, or submissive manner
- > Ensure children are adequately clothed taking into consideration the climatic, religious and cultural dress norms of individuals/the community and not in poses that could be seen as in any way sexually suggestive
- > Ensure images are honest representations of the context and the fact
- > Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form
- > Not use personal or physical information that could be used to identify the location of a child/children in any form of communication about a child, such as locality maps of specific communities, a child's surname or school name
- > Only use a child's first name, area and/or country name or use an alias (with note detailing that names have been changed to protect privacy). Exceptions to this obligation require the approval of the National Manager Child Protection, Safeguarding and Practice or International Programs Safeguarding & PSEAH Adviser
- > Store images securely consistent with relevant Red Cross policies (see Child Safety and Wellbeing Handbook sections 3.6 and 8.2)

The publication of images of children must not include any other specific locational information that could be used to identify or increase access to children.

In some instances, there may be challenges about the application of this guideline to a particular situation or image and/or it may be acceptable for other identifying information to be used along with a child's image. Written permission for exceptions to the above requirements should be sought from the National Manager Child Protection, Safeguarding and Practice or International Programs Safeguarding and PSEAH Advisor.

Contracted photographers are not licensed to use images of children for any purpose. All files carrying images of children in the possession of the photographer must be destroyed as soon as requested by Red Cross.

Compulsory consent form

Photographers must obtain the consent of a parent or guardian before photographing a child.

Photographers must take utmost care when photographing children, whose dignity and privacy must be protected at all times.

All subjects must sign a [Photo and Video Release and Privacy Collection Notice](#) assigning unrestricted usage and fully explaining for the subject the channels in which it may appear (web, publications, posters etc.) and that it may appear over a period of years. If confidentiality is a concern for the subject, this should be clearly noted, and images are not to be used if concerns cannot be managed to the satisfaction of both the subject and Red Cross.

All images/resources should be accompanied by a signed consent form and submitted to the image library. Any images not accompanied by a signed consent form will not be added to the image library and must be destroyed if consent cannot subsequently be demonstrated. In some situations, getting written consent might not be feasible and approaches for attaining verbal consent should be discussed with the International Communications team and Safeguarding Adviser.

Protecting children

In keeping with the Red Cross [Child Safety and Wellbeing Policy](#), [Standing Photography Videography Brief and Contract](#) and the on-boarding requirements detailed on the [Managing Contractors page on the Lounge](#), all contract photographers must undergo the appropriate screening checks and be supervised when photographing children.

Child soldiers carrying guns, or those at risk of being abused if identified, must not be photographed. If there is any doubt as to whether a child should be photographed, the photographer should not take the photograph.

International assignments

On some international assignments, particularly in developing countries, written forms might not be the most appropriate way to collect consent. For a variety of reasons, people may be either reluctant to sign a consent form or unable to do so due to literacy barriers. In these situations, it may be more appropriate to attain verbal consent, ensuring full informed consent and any language barriers are addressed. It is a requirement that an explanation be provided to the person about any photograph that is being taken, how it will be used and that any concerns be noted, including about naming or identification (agreeing on an alias, publishing in Australia but not in-country, etc.). This discussion is to be recorded in a file note. Before undertaking an overseas assignment, consent requirements must be discussed with the International Communications Team, IP Safeguarding Adviser and relevant Program Manager within International Programs.

See also, [Engagement and Support Policies](#) including:

- [Checklist Using Images of Children](#)
- [Standing Photography Videography Brief and Contract](#)
- [Photographic images and digital resources Policy](#)
- Child Safety and Wellbeing Handbook sections 3.6 and 8.2



the
power of
humanity

Child Safeguarding Risk Assessment

Purpose

This info sheet aims to help you to complete the child safeguarding component of a risk assessment. For more information on the Red Cross risk management process in general go to the [Risk page on the Lounge](#).

Child safeguarding risks must be assessed as part of standard risk management processes at design, implementation, monitoring and evaluation – and managed throughout the lifecycle of an activity, program or service.

Risk assessments are used to document:

- Potential risks in undertaking an activity or delivering a program or service;
- The impact of each identified risk occurring; and
- Controls and mitigation strategies to manage the risks.

When must you have a risk assessment in place that addresses child safeguarding concerns?

If you are implementing or designing any program, service or activity with likely engagement/contact with children, or where contact or involvement may be incidental but the risk is heightened due to increased vulnerabilities (such as in an emergency evacuation where children could be separated from their carers) you must have a risk assessment that addresses child safeguarding concerns.

What is a child safeguarding risk assessment and why do we need them?

A robust risk management process is an important part of the broader range of strategies in place at Red Cross that ensures we are a Child Safe Organisation.

We have a duty to protect the children we work with. We have a responsibility to make sure our programs and activities do not have negative impacts on children's safety and wellbeing, or cause them any harm. For all Red Cross activities which may impact children, we need to specifically consider and document any risks to children using the Red Cross RiskSmart Template in [PIMS](#), outlining the controls and mitigation strategies to prevent and minimise those risks.

The completed risk assessment is then used to determine if the controls and mitigation strategies are sufficient, informing decision making as to whether it is appropriate for a program, service or activity to commence/continue based on the identified risks and the available risk management options. The purpose is not to avoid working with children. It is important children are engaged across the organisation in positive and meaningful ways. Rather, the purpose is to identify the potential direct and indirect risks to children, and proactively develop effective strategies to reduce the likelihood of those risks occurring, and where possible removing risks altogether.

Who should undertake risk assessments?

Managers are required to lead the process to assess and document risks for any program, service or activity and record in PIMS. Managers should engage their team in the development of the risk assessment. Managers should also involve key stakeholders, including parents and children, in the development of risk assessments. Children will bring a different perspective about what makes them feel safe.



QUESTIONS AND ADVICE

If you have any queries in relation to child safety and wellbeing when undertaking a risk assessment please speak to your State/Territory Child Safety Lead or contact the Practice and Safeguarding Team safeguarding@redcross.org.au

If you have queries about the broader Risk Management policy and framework, please contact:

**Rick Catalano, National Manager
Risk & Insurance**
rcatalano@redcross.org.au

When should risk assessments be completed?

Risk assessments should be completed before the commencement of a new service or activity. The risk assessment must be regularly reviewed and updated to ensure that risks to children are proactively managed at all times to prevent harm. Risk assessments should be updated annually at a minimum, and more often when there are changes to the level of risk, type of activities, client cohort, location/environment, legislation or as identified.

Recording Risk Assessments in PIMS:

Before drafting your risk assessment you should ensure you are familiar with the [Red Cross Risk Management Framework](#) and [Using the risk rating system](#). The Framework outlines the risk management principles, policy, process, rating system, treatment and controls. Once completed, risk assessments must be entered into [PIMS](#).

It is important to be specific when assessing and recording risks. For example:

x - Children may be harmed

(Inappropriate: statement is too broad for effective controls to be implemented)

✓ - The outdoor play space has a poorly visible section next to the amenities block

(Appropriate: statement is specific enough to ensure effective controls may be implemented)

x Mandatory working with children checks

(Inappropriate: general control which does not address the specific risk identified)

✓ Disallow entry into the poorly visible area next to the amenities block, consider installation of CCTV facilities

(Appropriate: specific strategy addressing the risk of poor visibility)

Identify Risks:

Carefully consider in detail all potential risks to children in the program/service/activity. Hold brainstorming sessions with key stakeholders to collectively identify and analyse all the potential risks. (see key considerations).

Analyse and Evaluate the Risks:

Analyse and evaluate the risks, determining risk levels by thinking about the likelihood of a risk taking place and its consequences.

Mitigation strategies/controls:

After identifying specific risks in relation to child safety and wellbeing, consider what controls already exist to manage the risk, and what specific actions can be taken to ensure that children are safe and protected.

It is important to review any existing controls:

- Are they practical and used every day?
- Are they effective?
- Do they need to be updated or altered?

Communicate the risk assessment:

Make sure everyone responsible for implementing existing controls/new mitigation strategies is aware of their responsibilities, identifying if strategies are practical and effective, and addressing any gaps or concerns to ensure risks continue to be proactively managed.

Review the risk assessment:

The measures put in place to reduce the identified risks should be monitored throughout the life of the program/service/activity. Be sure to review and update the risk assessment as you implement the program/service/activity. This will give you the opportunity to see if your mitigation measures are working and to check if there are any other potential risks to children.

Key considerations:

- How might children be engaged or impacted by the program/service/activity?
- Even if children are not the focus, what unintended contact/engagement might occur? Are families involved? Is it open to the general public?
- Who are the children engaging in or having contact with the program/service/activity? Do they have specific vulnerabilities? Not all children are the same. They have different strengths, vulnerabilities and needs. Consider things such as age, disabilities, gender and identity, care arrangements, unaccompanied minors, issues with substance misuse, experiences of trauma.
- What types of harm could a child be subjected to, including physical, psychological, sexual, neglect and exploitation, intentional and unintentional harm? Consider also harm of a child by another child or participant (e.g. bullying).
- Are all employees, volunteers, members and suppliers/contractors aware of their responsibilities, appropriately trained and inducted, and competent in identifying and responding to risks and instances of harm? Consider all people who may have intentional or unintentional contact with children including: case workers, managers, administration and support staff, people with access to personal records, facilities and security staff, third parties such as contractors and partner services, other children, families, visitors community members and the general public.
- Who will be responsible for the supervision/care of children? Will children be left unsupervised by carers, intentionally or unintentionally?
- Will there be less than two adults present during the delivery of the program/service/activity? Will adults be required or able to spend one on one time with a child?
- Are staff, contractors or volunteers required to assist with personal hygiene tasks?
- Are there program/service/activity locations that make supervision and visibility difficult? Ensure situational prevention by making changes to the environment to lessen opportunities for harm to occur. For example, increasing natural surveillance by removing frosted glass or posters covering glass.
- Is the program/service/activity inclusive of and culturally safe for Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with a disability, and lesbian, gay, bisexual, transgender and intersex children?
- Do any of the physical or online spaces present any risks?
- Is the physical location secure? Are children able to leave the location without an adult? Can the general public access the environment? What additional risks are located nearby?
- What are potential child safety risks in the online environment (such as grooming, trolling or cyberbullying) and through media including:
 - ◊ Email
 - ◊ Facebook, Instagram, Twitter, Snapchat and other social media
 - ◊ YouTube
 - ◊ mobile phone SMS messages and other mobile messaging media
 - ◊ online fundraising platforms
 - ◊ telephone, Skype and other media for making voice calls
 - ◊ photography and videography
 - ◊ any other electronic media
- Make sure children know not to have online profiles set as 'public'. Each individual application or device's privacy setting should be set to 'private'. Consider the use of non-identifying photos and/or pseudonyms. Avoid detailed personal information such as school, home suburb, last name etc.

Key considerations (continued):

- Does the program/service/activity make children more identifiable or contactable, and thus more vulnerable (including media and online environments)?
- Are children's personal information stored on any record or database? If so these records/databases must have the appropriate restrictions in place to limit access.
- Have potential risks been explored with all staff and other relevant stakeholders (including children and families)?
- Are parents, children and other stakeholders aware of who is responsible for risk management for this program/service/activity?
- Is there an age appropriate mechanism that enables children to raise concerns or make allegations? How will this be regularly discussed with children participating?
- Is the program/service/activity being delivered in a school setting? If so the following are recommended:
 - ◊ A formal agreement between Red Cross and the participating school/s
 - ◊ A minimum of one Red Cross adult and one school staff member present during the program/service/activity
 - ◊ Anyone working in a school setting is required to have a Working with Children/Vulnerable People Check
- Is the program, service or activity being delivered in a public setting? If so the following are recommended:
 - ◊ An individual appointed to act in a supervisory capacity, guiding and supporting Red Cross people in the delivery of the program service/activity
 - ◊ All Red Cross people must wear Red Cross identification in a clear and visible location
 - ◊ A minimum of two adults must be present at all times

If these conditions are not possible, risk management strategies to address these gaps must be put in place and recorded on the risk assessment, and approval sought from the relevant Director(s) and National Manager Child Protection, Safeguarding and Practice.

Guidance tools:

- The Red Cross [Risk Management Framework](#), [Using the risk rating system](#), [Risk Mind Map](#) and other guidance tools are available on the [Risk page on the Lounge](#).
- International Programs have developed a range of tools available on [PIMS](#) and the Lounge including:
 - › [Step By Step Guide To Assessing Risks To Children In Australian Red Cross International Programming](#)
 - › [Child Protection Guidance Note for International Programs](#).

If using these guides in the Australian context, be aware some risks and mitigation strategies may differ to the International context.

SEE ALSO:

- [Keep Me Safe Tool Kit](#) for tools to help identify risks with children and families
- [OCG Risk Management Written Resource](#)
- [Free Child Safe eLearning through the NSW OCG](#) (Risk Assessment Module) sse

Clearance to Work With Children (WWCC) Guidance Tools

Purpose

This info sheet aims to help you to ensure that all Red Cross people and applicable suppliers undergo the required clearance checks necessary for a role that has contact with children or access to children's records.

Appropriate pre-employment screening checks are one important part of child safe practice at Red Cross. Screening checks alone will not make Red Cross a safe place for children. They must be used alongside broader child safe strategies. It is your responsibility to assess if employees, volunteers and suppliers reporting to you are suitable to be around children, are appropriately trained, and to monitor their behaviour around children, in addition to ensuring a all required screening is conducted and renewed as required.

How to determine if a Clearance to Work With Children is Required for a Role

Sometimes it is hard to determine if a role (whether employee, volunteer or supplier) requires a Clearance to Work with Children (WWCC). [The Safeguarding Screening Tool](#) is designed to help you determine all safeguarding screening requirements required for a role, including if a WWCC is required.

In general, a WWCC is required for any role that involves direct contact with children, due to the requirements of the role or the nature of the work environment. Roles that involve access to children's records may also require a WWCC under certain circumstances.

Consult the Practice and Safeguarding Team if considering not requiring a WWCC for any new position that may have contact with children or access to children's records. The National Manager Child Protection, Safeguarding and Practice must approve any proposal to change a previous assessment that a WWCC is required for an existing position. Legal may also need to be consulted to ensure legislative and contractual compliance.

It is likely that a role will require a WWCC where:

- There is direct contact with children (a person under 18 years of age). This includes physical contact, face-to-face (alone or supervised), communications via email, telephone or internet (except in retail)
- The role includes working with or supervising student placements or volunteers who may be under 18 years (except in retail)
- There is a contractual requirement. Certain contracts may stipulate that certain child safe screening checks be undertaken in order to be compliant with the terms of the agreement
- If it is reasonable to anticipate some contact with children is likely, regardless of whether the child is the client. This includes family support work, parent outreach programs, work undertaken in community and family targeted events/activities
- If the location/nature of the work is community facing, including if there is a possibility the work environment may have children present, particularly where children may at times be unsupervised (intentionally or unintentionally) even if the role itself does not involve work with children



Note: If any of the above points apply and you are considering not requiring a WWCC you must seek approval from the National Manager Child Protection, Safeguarding and Practice (and Legal Counsel if required) after consulting with local P&C/Volunteer Hub and the Child Safety Lead.

It is unlikely that a role will require a WWCC where:

- Direct contact with children or access to their information is not reasonably anticipated to be part of normal duties, and
- Children are rarely in the work environment and never unsupervised

Retail settings do not usually require a WWCC but other safeguarding processes apply.



Note: although a WWCC may not be required in these circumstances it is essential all Red Cross people are screened at interview and through reference checks, sign the Child Safe Code of Conduct and are aware of their responsibilities, including engaging in behaviour that keeps children safe at all times, immediately reporting any concerns for the safety or wellbeing of a child, and that appropriate risk mitigation processes are in place to ensure children are safe at all times. In addition, screening checks may be required for some roles working with vulnerable adults.

What if Red Cross requests a WWCC and the relevant regulator does not deem it necessary for the role?

- Notify the National Manager Child Protection, Safeguarding and Practice to organise for Red Cross to write to the regulator and request the role to be included
- If the regulator still will not process a WWCC, notify P&C, Volunteer Hub, Legal and the National Manager Child Protection, Safeguarding and Practice; store the regulator’s decision not to process the application on file, and implement other risk mitigation measures

If you have any further questions about whether a WWCC is required please see the [Child Protection Lounge](#). If you still have questions you can contact the Practice and Safeguarding Team safeguarding@redcross.org.au.

Overview of Who Determines if a Role Requires a WWCC

	Employee	Volunteer
Who writes Position Description?	Line Manager	Volunteer Manager & Volunteer Hub
Who Reviews the Position Description	People & Culture Manager/Business partner (BP)	Volunteer Hub
Who decides if a role does or does not require a WWCC?	<ol style="list-style-type: none"> 1. Line Manager & P&C Manager/BP 2. Child Safety Lead 3. National Manager Child Protection, Safeguarding and Practice (if required*) 4. Legal Counsel (if required*) 5. National People & Culture (if required*) 	<ol style="list-style-type: none"> 1. Volunteer Manager & Volunteer Hub 2. Child Safety Lead 3. National Manager Child Protection, Safeguarding and Practice (if required*) 4. Legal Counsel (if required*) 5. National Volunteer Directorate (if required*)
Who approves a request to remove the requirement for a WWCC for an existing role?	<ol style="list-style-type: none"> 1. National Manager Child Protection 2. Legal Counsel 	<ol style="list-style-type: none"> 1. National Manager Child Protection 2. Legal Counsel
Who Pays (if they don't have one)	Red Cross (program area)	Most jurisdictions have no cost for volunteers – if there is a cost Red Cross (program area) pays

* If required – these roles are available to support decision making as needed. Approval must be sought from the National Manager Child Protection, Safeguarding and Practice to not include a WWCC as per the note above

Flowchart A - New Employee Child Safeguarding Compliance Process

JOB EVALUATION

- Role is reviewed to determine if WWCC and any other screening checks are required
- Hiring Manager and People & Culture/Recruitment ensure WWCC requirement is included in PD
- People and Performance Lead records WWCC requirement in Aurion against position number



ADVERTISING

- Hiring Manager and People & Culture/Recruitment ensure role requisition includes WWCC requirements
- Recruitment team ensure role is advertised correctly



RECRUITMENT AND SELECTION

- Hiring Manager undertakes recruitment with support of Recruitment Team
- All Interview and reference check processes include the standard Child Safe questions. For roles that have contact with children/vulnerable people, further questions are included to assess applicants suitability
- NSW Randwick only - applicants are advised of role requirement they consent to be added to Residential Care Worker's register



PRE-COMMENCEMENT CHECKS

- Recruitment team facilitates process for new employee to complete a WWCC, or their existing WWCC information is collected. Note, the cost of a new WWCC is reimbursed by Red Cross program area
- NSW Randwick only - preferred applicant is added to Residential Care Worker's register and any required additional checks are conducted
- Recruitment Team ensure WWCC information is recorded in PageUp
- If any checks return with a negative result, Recruitment Team contacts Line Manager and local P&C and the candidate cannot be engaged



OFFER

- New starters agree to the Child Safe Code of Conduct as part of Offer Acceptance via PageUp
- Recruitment team ensures information is recorded on Payroll forms
- Payroll ensures WWCC information (including expiry date) is recorded in Aurion



COMMENCEMENT

- Hiring Manager cannot arrange for employee to commence until WWCC has cleared and Child Safe Code of Conduct has been received (regardless of individual jurisdictional requirements)



TRAINING

- Employee undertakes Safeguarding e-learning and Virtual Induction within 3 months of commencement
- Line Manager ensures completion of any additional training required

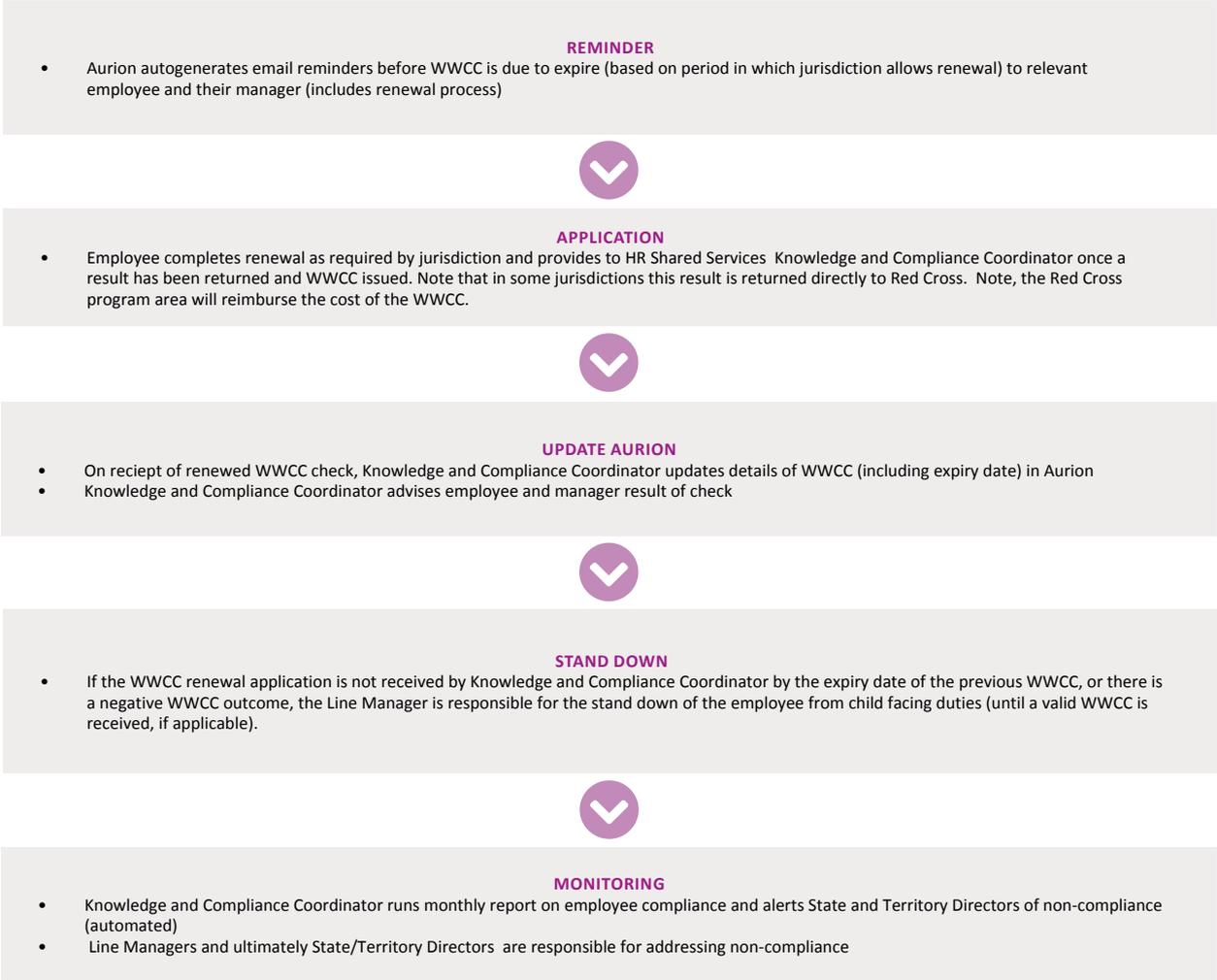


MONITORING

- HR Shared Services Knowledge and Compliance Coordinator runs monthly report on employee compliance and alerts State and Territory Directors of non-compliance (automated process)
- Head of People is responsible for addressing non-compliance for new starters

For details of people in roles outlined above go to [HR Organisational Chart on Lounge](#)

Flowchart B – Current Employee WWCC Renewal Process



Flowchart C - New Volunteer Child Safeguarding Compliance Process

Note: This is a summarised version of the child safeguarding compliance process for new volunteers. For a more detailed version of the process please contact Volunteering

- Local Volunteer Hub undertakes recruitment

RECRUITMENT



- Volunteer signs Child Safe Code of Conduct
- Application for a WWCC is undertaken in line with local jurisdiction requirements (note most have no cost for volunteer checks, but if not the Red Cross program will reimburse cost of check)

APPLICATION



- Local Volunteer Hub updates details of WWCC (including expiry date) and Child Safe Code of Conduct in MAVIS

UPDATE MAVIS



- Volunteer cannot commence work until all compliance requirements are completed, including reference checks and WWCC clearance.
- If a check is returned with a negative result, Hub contacts Line/Volunteer Manager and volunteer cannot be engaged

COMMENCEMENT



- Volunteer undertakes Volunteer Induction (including Child Safeguarding) e-learning within 3 months of commencement
- Volunteer Manager ensures completion of any additional training required

TRAINING



- Volunteering Operations Team distributes monthly reports on volunteer compliance
- Hubs, Line/Volunteer Managers and ultimately State and Territory Directors are responsible for addressing non-compliance

MONITORING

Flowchart D – Current Volunteer WWCC Renewal Process

Note: This is a summarised version of the volunteer WWCC renewal process. For a more detailed version of the process please contact Volunteering.

REMINDER

- Line/Volunteer Managers and volunteers are advised of renewal requirements for WWCC 60 days prior to expiry.



APPLICATION

- Application for a WWCC renewal is undertaken in line with local requirements (note most jurisdictions have no cost for volunteer checks, but if not the Red Cross program will reimburse cost of check)



UPDATE MAVIS

- Local Volunteer Hubs update details of WWCC (including expiry date) in MAVIS



STAND DOWN

- Line/Volunteer manager is responsible for the stand down of any volunteers without valid WWCC from child facing duties



MONITORING

- Volunteering Operation Team distributes monthly reports on volunteer compliance
- Hubs, Line/Volunteer Managers, and ultimately State/Territory Directors are responsible for addressing non-compliance

the
power of
humanity

Professional Boundaries and Child Safeguarding

Purpose

This info sheet aims to help you understand and maintain professional boundaries and thus help to keep children safe. It is very important Red Cross people, contactors and partner organisations maintain appropriate professional boundaries at all times with Red Cross beneficiaries.

What are professional boundaries?

Professional boundaries are behaviours expected by legal, ethical, and professional standards that maintain safety in the relationship between service providers and the communities they seek to benefit. These boundaries ensure that the focus of the relationship remains on the client or community's needs. This applies to interactions with beneficiaries both at work and outside of work. Any action or behaviour that personally benefits a Red Cross person at the expense of a client or community is a boundary violation.

Why are professional boundaries important to keeping children safe?

Professional boundaries are critical behaviours that help to keep children safe from harm, help maintain and build on children's resilience, and protect Red Cross people from allegations of improper conduct.

Crossing or breaching professional boundaries with a child places both the child and the Red Cross person at risk, and may even constitute grooming.

It may be innocent

You may be trying to help a client out of a tricky situation, trying to make a connection, trying to please people or make them happy, or being funny and light-hearted. Keeping things fun and age appropriate is fine, but blurring the line between friend and professional can put children at risk. Clients may come to depend on you inappropriately in ways you can't maintain. It can model to kids that it's okay to have blurred relationships with professionals. By sending a mixed message, you put yourself at risk of an allegation, and you teach kids that it is okay for professionals to act this way, making them more at risk if other professionals blur boundaries for more sinister reasons.

What is appropriate will depend on the nature of your role and the community context. What is really important is that you always ensure your actions are in the best interests of the child, and that you avoid actions that may intentionally or unintentionally put the child at risk now or in the future. If in doubt talk to your manager and your colleagues and agree together on an approach that works best for your context.

What is grooming?

Crossing professional boundaries can be a way to intentionally gain access to a child and get them to lessen their defenses so they can be harmed.

Examples of potential breaches of professional boundaries that may constitute grooming include:

- Gift giving - Giving children gifts while excluding other children, encouraging a child to give gifts. This can isolate a child from their peers and make them feel indebted. It can create the illusion of a 'special relationship' between the victim and perpetrator. The perpetrator could use the threat of removing the gift to gain compliance
- Physical interaction - Spending time alone with a child unnecessarily, having contact outside of the workplace, sitting a child on your lap, repeatedly brushing against a child, going beyond normal touching while performing a task, or seemingly accidental or deliberate touching of intimate areas. This can normalise inappropriate behaviour and tests the boundaries of what the child finds acceptable
- Special treatment - Allowing a child to break rules, showing favouritism, consistently selecting one child or a group for special treatment, repeatedly telling a child they are beautiful. This can create relationships based on power and can isolate the child from their peers. Sometimes the special treatment leads some children to feel privileged and 'closer' to their abuser.

In order to develop the trust necessary for ongoing abuse to occur, an abuser may target and groom parents, guardians and responsible adults so they can gain access to a child. Such as:

- Undermining colleagues to deflect and disguise the groomer's behaviour
- Encouraging others to breach professional boundaries
- Arranging activities that require the supervision of the groomer which leave them alone with a child
- Telling others that a child has a 'crush' on the groomer and blaming the child for any inappropriate behaviour
- Making themselves invaluable to the child's successes
- Seeking invitations to a child's home
- Undermining parental guidance and authority, or telling a child their parents don't understand them
- Ignoring requests to limit contact with a child
- Telling a child they won't be believed if they speak up

People who are grooming may seek to desensitise others to their inappropriate actions and relationship with a child. This might include:

- Repeatedly flattering a child or their parent/carer
- Claiming to have a 'special relationship'
- Talking to a child about their sexuality
- Entering private areas such as changing rooms unnecessarily or unannounced
- Nudity or partially undressing in front of a child, or encouraging the child to undress

- Having a child pose in an adult or sexualised way for photographs
- Commenting on the sexual characteristics of a child such as changes due to puberty, growth of breasts or body hair

Sexual misconduct or crossing professional boundaries?

Grooming a child is sexual misconduct, so caution should be exercised before identifying every crossing of professional boundaries as grooming. A Red Cross person who on a single isolated occasion told a mildly sexual joke, for example, displayed poor judgement but has not necessarily engaged in sexual misconduct. However, they should be clearly informed that their behaviour is inappropriate. Persistent minor breaches of professional standards or even a single serious crossing of boundaries may constitute sexual misconduct, particularly if the person knows, or ought to know, their behaviour is unacceptable.

Examples of unacceptable conduct

Line managers must ensure people understand the behaviour expected of them, and some people may need more detailed descriptions of what constitutes appropriate behaviour. Examples of unacceptable conduct include:

- Giving and receiving gifts (excludes universal gift giving from the organisation as part of a program, that is appropriate to traditional practices and preexisting relationships, such as in community settings, noting that a clear plan must be in place to manage perceived and actual conflicts of interest)
- Provision of drugs or alcohol to children (excludes medications under an approved administration of medication plan)
- Coercive behaviour such as threats of violence or denial of privileges/services
- Requesting a child's contact details or accessing children's records without having a professional reason
- Contacting the child directly rather than the child's parents or guardians (excepting youth work where direct contact with the young person may be standard procedure)
- Introducing clients to your family or friends
- Giving clients your personal contact details such as phone number, address or accepting social media friend requests (except as an approved means of contact under the program guidelines e.g. volunteer mentoring)
- Arranging to see children outside of work or accepting invitations to events not related to the professional relationship (excepting where a personal relationship pre-exists, such as in community)

If in doubt talk to your manager and your colleagues and agree together on an approach that works best in your context. Additional support and guidance is also available through your Child Safety Lead, the Practice and Safeguarding Team, and People & Culture.