

# ROYAL LIFE SAVING CHILD SAFE POLICY

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NSW, ACT & TAS ONLY  
April 2021



**ROYAL LIFE SAVING**  
NEW SOUTH WALES



**ROYAL LIFE SAVING**  
AUSTRALIAN CAPITAL TERRITORY



**ROYAL LIFE SAVING**  
TASMANIA

## 1. INTRODUCTION

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Royal Life Saving (RLS) is committed to the safety and wellbeing of children and young people.

Following the Royal Commission, ten Child Safe Standards have been developed to be the guiding principles of a Child Safe Organisation.

These Standards have been endorsed at a federal and state level and inform child-related organisations about the practices to be adopted and outcomes to be achieved by a child-related organisation.

This Child Safe Policy is based on the 10 Child Safe Standards<sup>1</sup>.

## 2. PURPOSE

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The purpose of the Child Safe Policy is to define RLS's principles, requirements and approach in the area of child safety and wellbeing.

The objectives of this child safe policy are:

- To protect children and young people from abuse.
- To provide an environment where all children, young people and their families are safe.
- To create a culture in which the individual requirements of each child to be and feel safe are understood and met.
- To outline the principles of empowerment of children and young people to understand their rights and to have an effective voice in matters concerning their safety.
- To ensure all stakeholders understand their responsibilities and the standards of behaviour expected of them.
- To clearly outline the complaint and support process for children, young people, and their families.
- To outline the key principles by which environments will be designed to minimise opportunities for harm and abuse to occur.
- To ensure that recruitment policies and practices make the protection of children the first and most important priority.
- To establish the nature and frequency of monitoring and review of child safe policies and practices.

RLS implements a range of policies to ensure the safety of our people. This Child Safe Policy sits alongside other organisational and governance policies and provides a framework to better all our people (children, young people, our staff, volunteers and community).

<sup>1</sup> Volume 6, 'Making Institutions Child Safe', Royal Commission into Institutional Responses to Child Sexual Abuse 2017

### 3. SCOPE

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RLS is committed to child safety across all operating environments services and activities; and has a zero-tolerance approach to child abuse.

This policy applies to all RLS services, operating in:

- Australian Capital Territory (ACT)
- New South Wales (NSW)
- Tasmania (Tas)

### 4. RESPONSIBILITY

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This policy applies to the following groups of people at RLS NSW, regardless of whether they are in a paid, unpaid or trainee position:

- Board members
- Executives and facility managers
- Program coordinators
- Swim school supervisors
- Course trainers
- Swim school instructors, coaches, and lifeguards
- Contractors
- Trainees
- Parents and guardians, or other accompanying family members
- Spectators

RLS Senior Management will support the implementation and of the Child Safe Policy.

All RLS management will enable this Child Safe Policy (and associated policies, procedures and processes) to operate effectively through communication, practice and support.

All staff, contractors, volunteers and any other member of the RLS community involved in child related work are required to comply with the Child Safe Policy by complying with the standards, responsibilities and requirements provided in this document.

## 5. CHILD SAFE STANDARDS

This Child Safe Policy is underpinned by the 10 Child Safe Standards. The 10 Child Safe Standards are essential elements in creating a Child Safe Organisation.

Figure 1. Child Safe Standards



1. Child safety is embedded in organisational leadership, governance and culture.
2. Children participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved.
4. Equity is upheld, and diverse needs are taken into account.
5. People working with children are suitable and supported.
6. Processes to respond to complaints of child abuse are child focused.
7. Staff are equipped with the knowledge, skills and awareness to keep children safe through ongoing education and training.
8. Physical and online environments minimise the opportunity for abuse to occur.
9. Implementation of the Child Safe Standards is continuously reviewed and improved.
10. Policies and procedures document how the organisation is child safe<sup>2</sup>.

2 [https://www.childabuseroyalcommission.gov.au/sites/default/files/final\\_report\\_-\\_volume\\_6\\_making\\_institutions\\_child\\_safe.pdf](https://www.childabuseroyalcommission.gov.au/sites/default/files/final_report_-_volume_6_making_institutions_child_safe.pdf)

## 6. OUR COMMITMENTS

### 6.1 To Children and Young People

Children and young people have a right to feel safe and to be respected. Children & young people require extra safeguards due to their vulnerability.

We commit to:

<ul style="list-style-type: none"> <li>○ Providing an environment which fosters the safety and wellbeing of children &amp; young people.</li> </ul>	<ul style="list-style-type: none"> <li>○ Valuing diversity and giving all children &amp; young people, regardless of background or ability, equal opportunities to participate.</li> </ul>
<ul style="list-style-type: none"> <li>○ Empowering children &amp; young people to voice their concerns when they do not feel safe.</li> </ul>	<ul style="list-style-type: none"> <li>○ Ensuring that, where appropriate, all children &amp; young people have access to child safety information, support and complaints processes.</li> </ul>
<ul style="list-style-type: none"> <li>○ Listening and responding to the concerns of children, young people and their parents and/or guardians.</li> </ul>	<ul style="list-style-type: none"> <li>○ Promoting the cultural safety of Aboriginal and Torres Strait Islander children &amp; young people.</li> </ul>
<ul style="list-style-type: none"> <li>○ Ensuring children &amp; young people understand their rights and the boundaries between appropriate and inappropriate behaviour.</li> </ul>	<ul style="list-style-type: none"> <li>○ Emphasising the safety of children &amp; young people with a disability and providing additional support where necessary.</li> </ul>
<ul style="list-style-type: none"> <li>○ Supporting children &amp; young people to feel comfortable with their identity and to be in control of their behaviour.</li> </ul>	<ul style="list-style-type: none"> <li>○ Promoting the cultural safety of Culturally and Linguistically Diverse (CALD) children &amp; young people.</li> </ul>

## 6.2 To Parents and Guardians

RLS acknowledges that parents and guardians have the primary responsibility for the upbringing and development of their child. RLS partners with parents and guardians to foster a child safe environment.

We commit to:

<ul style="list-style-type: none"> <li>○ Providing a supportive environment for parents and guardians to maximise the safety of children &amp; young people.</li> </ul>	<ul style="list-style-type: none"> <li>○ Maintaining regular contact with parents and guardians about changes or updates to child safe practices.</li> </ul>
<ul style="list-style-type: none"> <li>○ Providing transparent communication with parents and guardians relating to the safety of their children.</li> </ul>	<ul style="list-style-type: none"> <li>○ Listening and responding promptly to any views or concerns raised by parents and guardians relating to child safety.</li> </ul>
<ul style="list-style-type: none"> <li>○ Ensuring that parents and guardians have access to the Child Safe Policy (on site and online) as well as other relevant child safe resources.</li> </ul>	<ul style="list-style-type: none"> <li>○ Providing parents and guardians with critical contact information, including details of the relevant Child Safety Officer.</li> </ul>

## 6.3 To Being a Child Safe Organisation

RLS is committed to being a Child Safe Organisation in accordance with the Child Safe Standards. RLS aims to create a culture of child safety by adopting strategies and taking action to prevent harm to children within the organisation.

We commit to:

<ul style="list-style-type: none"> <li>○ Creating an environment where all children, young people and their families feel safe and supported.</li> </ul>	<ul style="list-style-type: none"> <li>○ Monitoring child safe policies to ensure they are effective and up to date.</li> </ul>
<ul style="list-style-type: none"> <li>○ Providing a safe physical environment designed to protect children from harm.</li> </ul>	<ul style="list-style-type: none"> <li>○ Ensuring all staff are equipped with adequate knowledge and resources to foster positive relationships with children.</li> </ul>
<ul style="list-style-type: none"> <li>○ Conducting regular monitoring of our online environment to ensure safe use and access to our resources.</li> </ul>	<ul style="list-style-type: none"> <li>○ Ensuring that all staff and families comply with our Child Safe Policy and Code of Conduct.</li> </ul>

## 7. INCLUSION

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### 7.1 Children and Young People

RLS encourages the active participation of all children and young people in our programs and activities. RLS listens to children and young people to ensure they feel supported.

Organisations that foster a culture of communication and participation create a safe environment for children and young people to voice concerns when they do not feel safe.

RLS encourages children and young people to participate by:

- Empowering them to voice their feedback and concerns
- Listening and responding to their concerns
- Ensuring they understand their rights and boundaries relating to appropriate and inappropriate conduct
- Seeking their feedback
- Prohibiting discrimination in any form
- Providing child-friendly information and complaint avenue access.

### 7.2 Equity and Diversity

RLS actively recognises the diverse circumstances of children and young people and respond to those with additional vulnerabilities. We ensure that children and young people from all backgrounds have an equal opportunity to participate in our programs and activities.

We pay particular attention to the needs of Aboriginal and Torres Strait Islander children, children with a disability, children from Culturally and Linguistically Diverse (CALD) backgrounds, and those who form part of the LGBTIQ+ community.

We ensure the needs of those from diverse backgrounds are met by:

- Recognising, respecting and supporting those who come from diverse backgrounds
- Providing a safe environment for those with a disability and ensure that they have access to strategies and support to reach their full capacity
- Providing regular training to our staff to ensure they are well equipped to cater for those with additional needs
- Incorporating culturally diverse perspectives into all RLS policies and procedures.

## 8. APPROACH TO CHILD SAFETY

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This section provides an overview of the policies, procedures and processes in place to support child safety across the organisation.

## 9. CHILD SAFE CODE OF CONDUCT

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All RLS staff (paid, unpaid or trainee positions) must ensure that at all times they display appropriate standards of behaviour towards children and young people; ensuring that their rights are respected, they feel safe and protected and their concerns are taken seriously.

The **Royal Lifesaving Child Safe Code of Conduct Policy** outlines the expectations and appropriate standards of behaviour towards children and young people.

The purpose of the policy is to protect children and young people through reducing the opportunities for abuse or harm to occur.

The policy also provides support for staff through guidance on how to:

- a. Avoid situations of potential harm or abuse;
- b. Better manage such situations when they cannot be avoided; and
- c. Better support children and young people.

The Code of Conduct Officer can be contacted by email at [cso@royalnsw.com.au](mailto:cso@royalnsw.com.au) or by phone on **(02) 9634 3700**.



## 10. STAFF AND EMPLOYMENT

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### 10.1 Recruitment and Induction

RLS takes all reasonable steps to ensure that all staff are suitable for their role. RLS conducts rigorous recruitment and screening procedures in accordance with best practices, to ensure that all staff are suitable to work with children and young people.

RLS ensures that child safety is embedded throughout the following stages of the employment process:

1. Job Description
2. Screening
3. Interview
4. Induction
5. Probation Period.

### 10.2 Process and Practice

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#### 1. Job Description

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- Identifies how the applicant will work with children & young people and what their child safe responsibilities are (including reporting obligations).
- Includes a statement of commitment to child safety.
- Refers to the Child Safe Policy and Child Safe Code of Conduct.
- Selection criteria includes attitude towards child safety.
- In ACT, includes a Working with Vulnerable People (WWVP) clearance as a prerequisite to receiving an offer of employment.
- In NSW, includes a Working with Children Check (WWCC) clearance as a prerequisite to receiving an offer of employment.
- In Tasmania, includes a Registration to Work with Vulnerable People (RWVP) clearance as a prerequisite to receiving an offer of employment.
- Outlines key child safe expectations.

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#### 2. Screening

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RLS conducts the following screening procedures for the role:

- We verify applicant's identity, qualifications and professional registration
- We conduct thorough reference checks with at least two identified referees
- We verify WWCCs, WWVPs and RWVPs and/or National Police Checks
- We ensure applicants have suitable experience with working with children & young people.

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#### 3. Interview

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- Provides clear information to applicants about the organisational commitment to child safety.
  - Includes behavioural questions relating to child safe practices.
  - Includes questions to assess the values, motives and attitudes of applicants who will be working directly with children.
  - Assesses the applicant's professional experience, qualifications and competence to work with children.
  - Ascertain whether the applicant has prior involvement in a complaints process in previous employment.
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## 4. Induction

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Child Safe Induction covers the following child safety topics:

- Understanding the child safe policy
- Staff code of conduct
- Risk management
- Responding to disclosures
- Reporting obligations
- Forms and indicators of abuse
- Complaints-handling process
- Reporting obligations.

RLS staff and contractors are required to sign a declaration that they:

- Have read and understood the Child Safe Policy and are fully aware of consequences of breaching the Policy
- Have received Child Safe training
- Are aware of any mandatory reporting obligations.

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## 5. Probation

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RLS staff are subject to an initial probationary period as set out in the employment contract.

- During this period, work performance and general suitability to work with children and young people will be assessed.
  - RLS may take remedial action or terminate the employment of staff, if the staff member is assessed as not being suitable to work with children and young people or not up to the required standard.
  - Refer to Employee Handbook for guidance relating to breach of probation.
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## 11. EDUCATION AND TRAINING

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All RLS staff are provided with regular child safe training and are supported to work with children & young people.

RLS ensures staff are able to foster a child safe environment and are equipped to respond to child safety concerns. RLS provides staff with:

- Child safe refresher training on the Child Safe Policy, and other relevant policies and procedures
- Guidance on supervision and people management with a child safety focus
- Opportunities to attend information sessions on child safety
- Support to develop practical skills in protecting children and responding to disclosures
- Opportunities to voice child safe concerns.

### 11.1 Child Handling and Physical Contact

Children and young people are considered to be vulnerable because of their age. It is therefore essential that extra safeguards are in place to ensure they are protected.

RLS provides a comprehensive child handling guide for all staff who interact with children and young people whilst carrying out their duties and responsibilities in the workplace, including:

- Managing consent
- Use of toilets
- Appropriate / Inappropriate Handling and Physical Contact
- Change room guidelines
- Guidelines on photography and video
- Online environment.

Refer to the Royal Lifesaving Child Contact and Physical Handling Guidelines for further information on the policy, standards and obligations for working with children and young people.

## 12. COMPLAINTS MANAGEMENT AND REPORTING

RLS is committed to ensuring children & young people feel safe and respected. To achieve this, RLS ensures that all child safety complaints are taken seriously and responded to promptly.

RLS strives to be as transparent as possible whilst respecting the privacy of parties and supports a safe disclosure of risks of harm to children, through the complaint process. RLS will treat all personal information obtained throughout the complaints process in accordance with the law.

RLS will not penalise or inflict adverse consequences on any person for making a complaint.

Refer to the Royal Lifesaving Child Safe Complaints Management and Reporting Policy for further information on the process for reporting and responding to complaints or allegations of conduct.

### 12.1. Additional Information

RLS takes reports of child abuse and neglect very seriously. If you believe or suspect a child is at risk of significant harm or is suffering abuse, immediately report to the RLS Child Safety Officer. Senior Management will be responsible for the direct reporting of allegations to the police, and the relevant government agency, if the incident was not immediately reported at the time it occurred.

#### NSW

If you need more information visit the preventing child abuse and neglect web page on the NSW Department of Communities and Justice website <https://www.dcj.nsw.gov.au>

#### ACT

If your concerns do not warrant a report to Child and Youth Protection Services, but you are worried about a child, consider contacting OneLink who can connect you to a wide range of support services 1800 176 468 or <https://www.onelink.org.au>

#### TASMANIA

Visit the Legal Aid Commission of Tasmania website for more information.

### 12.2 Emergency Contacts

Police	Triple Zero - 000
Child Protection Hotline NSW	132 111
ACT Child and Youth Protection Service	General Public: 1300 556 729 Mandated Reporters: 1300 556 728
Tasmania Child Safety Service	1800 000 123

### 12.3 Child Safe Officer

The Child Safety Officers (CSO) are the nominated people who oversee child safe practices and address child safety concerns. The CSO's details are below.

Name	Contact Number	Email
Ms. Cherry Bailey (ACT)	02 6260 5800	cherrybailey@royalact.com.au
Ms. Karina Siggins (TAS)	03 62437558	karinasiggins@royaltas.com.au
Ms. Lisa Critoph (NSW)	02 9634 3700	lisacritoph@royalnsw.com.au
Mr. Ben Cottee (NSW / ACT / TAS)	02 9634 3700	bencottee@royalnsw.com.au
Ms. Bernadette Neal (NSW)	02 8814 8637	bernadetteneal@royalnsw.com.au
Ms. Louise Smalley (NSW)	02 9634 3700	louisemalley@royalnsw.com.au

## 13. RISK MANAGEMENT

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Certain physical environments can pose a risk to children & young people. Child Safe Organisations improve safety by analysing and addressing risks, reducing opportunities for harm and increasing the likelihood of perpetrators being caught.

RLS staff are to conduct risk assessments of events and activities where children & young people may be at risk of harm.

RLS adopts a situational prevention approach to risk management, underpinned by the following principles:

- Creating and protecting value in the organisation and its decision making
- Addressing uncertainty through being systematic, structured and timely
- Taking into account human and cultural factors
- Being transparent, inclusive and responsive to change.

RLS ensures that information about risks and its management are reported and used as a basis for decision making.

Refer to the Royal Lifesaving Risk Management Guidelines for further information on the process for risk management process and procedures.

## 14. CONTINUOUS IMPROVEMENT

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RLS is committed to ensuring the Child Safe Policy and child safe practices are continuously reviewed and improved.

The intention of the review process is to ensure that the RLS Child Safe framework is compliant with relevant legislative requirements, reflective of community expectation and are implemented throughout the organisation.

We achieve this by:

- Reviewing the Child Safe Policy and related policies on an annual basis
- Welcoming feedback from staff, parents/guardians, and children & young people
- Holding consultations with staff, families and children & young people
- Responding to feedback and complaints in a timely manner
- Ensuring complaints and concerns are analysed to identify causes and systemic failures to inform continuous improvement
- Providing staff with ongoing child safe education and training.
- Regular reporting on RLS Child Safe activities and reviews to the relevant governance or management committees.

To provide feedback on any of the RLS policies, processes or practices, email [cso@royalnsw.com.au](mailto:cso@royalnsw.com.au)

## 15. RECORD KEEPING

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RLS keeps complete and accurate records of all incidents, responses and decision-making relevant to child safety and child wellbeing for a period of 40 years.

RLS ensures that all records are:

- maintained appropriately in a clear, logical and secure manner
- dealt with in accordance with the relevant law or policy
- available for individuals who have a right to access institutional records which contain their personal information.

RLS does not disclose sensitive personal information to third parties without permission or instruction from the individual, unless required by law to do so.

RLS ensures that all staff are aware of and understand their rights regarding the collection of data, information sharing and recording keeping.

## 16. RELEVANT LEGISLATION, POLICIES AND DOCUMENTS

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### 16.1 Policies and documents

- Royal Life Saving Child Safe Code of Conduct (NSW, ACT & TAS Only)
- Royal Life Saving Child Safe Handling and Physical Contact Guidelines (NSW, ACT & TAS Only)
- Royal Lifesaving Charter of Commitment to Children and Young People
- Royal Life Saving Working With Children Guidelines (NSW, ACT & TAS Only)
- Royal Life Saving Employee Handbook (NSW, ACT & TAS Only) - Internal
- Royal Life Saving Risk Management Guidelines (NSW, ACT & TAS Only) - Internal
- Royal Life Saving Forms and Signs of Child Abuse Staff Information Sheet (NSW, ACT & NSW Only) - Internal

### 16.2 Relevant Legislation

- Child Protection (Working with Children) Act 2012 (NSW)
- Children and Young Persons (Care and Protection) Act 1998 (NSW)
- Children and Young People Act 2008 (ACT)
- Children, Young Persons and Their Families Act 1997 (Tas.)
- Registration to Work with Vulnerable People Act 2013 (Tas)
- Working with Vulnerable People (Background Checking) Act 2012 (ACT)

## 17. REPORTING BODIES

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### NSW

- Office of Children's Guardian
- Department of Communities and Justice

### ACT

- ACT Ombudsman
- Child and Youth Protection Services

### Tasmania

- Department of Health and Human Service

## 18. TERMS AND DEFINITIONS

### 18.1 Terms Used in this Policy

CALD	Culturally and Linguistically Diverse.
Child	A child is a person under the age of 18 years.
Child Abuse	Acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child or young person.
Children and young people	Throughout this policy, the term 'children and young people' is used. Although a 'young person' under 18 is legally considered to be a child, we recognise the difference in maturity levels between a teenager and an infant. We also acknowledge that older children often prefer to be called a young person, and not a child.
Child Safe Organisation	An organisation that creates cultures, adopts strategies, and takes action to prevent harm to children. It consciously and systematically creates conditions that reduce the likelihood of harm to children, creates conditions that increase the likelihood of identifying and reporting harm, and responds appropriately to disclosures, allegations, or suspicions of harm. A Child Safe Organisation meets the Child Safe Standards.
LGBTIQA+	Aromantic/aro, Asexual/ace, Bisexual, Gay, Heterosexual, Lesbian, Pansexual, Queer/Questioning
Mandatory Reporters	Designated people who are obliged by law to report suspected cases of child abuse and neglect to government authorities.
Participant	Any person participating in training delivered by RLS NSW.
Patron	Any adult (not staff) or child who uses the aquatic facilities.
Royal Commission	Royal Commission into Institutional Responses to Child Sexual Abuse.
RLS	Royal Life Saving.
RLS staff (staff)	Anyone who performs work, in any capacity, for RLS is considered a worker. This includes paid workers and unpaid workers such as volunteers, trainees or work experience students.
RWVP	Registration to Work with Vulnerable Persons.
WWCC	Working with Children Check.
WWVP	Working with Vulnerable Persons.

## 19. POLICY STATUS AND REVIEW

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The contents of the document represent the current Child Safe Policy of RLS.

**Endorsed by:** Michael Ilinsky  
**Role:** Chief Executive Officer

### 19.1. Modifications and review

This policy is due to be reviewed annually (or earlier, where indicated as part of the Work Health and Safety review process). The Chief Executive Officer is responsible for the review of this policy.

### 19.2. Document information

Document Ref	CSPOLO1
Document Title	Royal Life Saving Child Safe Policy (NSW, ACT & TAS Only)
Document Type	Policy
Document Owner	Royal Life Saving
Version	2.0

## 20. POLICY CONTACT

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The Child Safety Officer (CSO) is the nominated person who oversees child safe practices and addresses child safety concerns.

Any policy enquiries should be directed to [cso@royalnsw.com.au](mailto:cso@royalnsw.com.au).



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## FOR MORE INFORMATION IN NSW

**Sydney** T: 02 9634 3700  
E: [nsw@royalnsw.com.au](mailto:nsw@royalnsw.com.au)

**Hunter** T: 02 4929 5600  
E: [hunter@royalnsw.com.au](mailto:hunter@royalnsw.com.au)

**Illawarra** T: 02 4225 0108  
E: [illawarra@royalnsw.com.au](mailto:illawarra@royalnsw.com.au)

**Northern** T: 02 6651 6266  
E: [northern@royalnsw.com.au](mailto:northern@royalnsw.com.au)

**Riverina** T: 02 6921 7422  
E: [riverina@royalnsw.com.au](mailto:riverina@royalnsw.com.au)

**Western** T: 02 6369 0679  
E: [western@royalnsw.com.au](mailto:western@royalnsw.com.au)

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## FOR MORE INFORMATION IN ACT

Call **02 6260 5800**  
Email [act@rlssa.org.au](mailto:act@rlssa.org.au)

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## FOR MORE INFORMATION IN TASMANIA

Call **03 6243 7558**  
Email [tas@rlssa.org.au](mailto:tas@rlssa.org.au)

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 [royallifesaving.com.au](https://royallifesaving.com.au)