Bravehearts

bravehearts.org.au

CHILD SAFEGUARDING RISK MANAGEMENT STRATEGY

SEPTEMBER 2025

BRAVEHEARTS CHARTER OF COMMITMENT TO CHILDREN AND YOUNG PEOPLE

Bravehearts is unwavering in our commitment to the safety and wellbeing of all children and young people accessing our services. We act without hesitation to ensure the legal rights of all children and vulnerable persons are maintained.

Guided by the United Nations Convention on the Rights of the Child and the National Principles for Child Safe Organisations, Bravehearts is dedicated to fostering a culture where every child is valued, respected, and safe from harm, with this Statement of Commitment forming the foundation of our Child and Youth Risk Management Strategy.

WE PLEDGE TO

Prioritise the Child

The best interests of children are at the forefront of every decision and action we take.

Cultivate a Safe Culture

We are dedicated to creating and maintaining a child-safe environment characterised by transparency, accountability, and a shared responsibility for protecting children from sexual abuse and exploitation, and abuse and neglect more broadly.

Empower Voices

We actively listen to and amplify the voices of children and young people, ensuring their perspectives shape our policies, programs, and practices.

Act with Vigilance

All Bravehearts personnel (National Board, staff, students, and volunteers) are mandatory reporters, committed to promptly reporting any concerns about a child's safety to the appropriate authorities, irrespective of age, type of harm or location.

Collaborate for Impact

We operate in a spirit of cooperation and consultation with other relevant agencies in matters concerning child protection. We work in close partnership with families, communities, and other agencies to create a network of support that protects and promotes the wellbeing of children.

Strive for Excellence

We are committed to continuous improvement in our child safeguarding practices, regularly reviewing our policies, procedures, and training to ensure they reflect the highest standards.

At Bravehearts, we believe that every child deserves a safe and nurturing environment in which to thrive. This commitment is at the heart of everything we do. Total community effort towards the protection of children and vulnerable people is of the utmost importance.

Bravehearts
EDUCATE + EMPOWER + PROTECT

Document Title	**Bravehearts Child Safeguarding Risk Management Strategy**
Document Reference	Governance & Management (G) **G029**
Current Version	001
Previous Version	000
Responsible Person	Chief Executive Officer (CEO)
Approved by CEO and/or **Board**	September 2025
Reviewed by	Clinical & Quality Advisory Committee
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Contents

Purpose

The purpose of this strategy is to make sure Bravehearts provides a safe, supportive and empowering environment for children and young people across all its services and programs.

It outlines Bravehearts' commitment to:
- Embedding child safety and wellbeing into all aspects of governance, culture and practice
- Upholding the cultural safety and rights of Aboriginal and Torres Strait Islander children and young people
- Identifying, assessing and mitigating risks of harm in physical, digital and relational environments

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- Complying with the legislative requirements for each state and territory, including working with children checks and child safe standards
- Supporting staff, volunteers, children, families and communities to understand and uphold child safety responsibilities.

This strategy complements our existing risk-management framework and approach and supports consistent decision-making and continuous improvement in Bravehearts' child-related services.

Scope

This strategy applies to all Bravehearts Officers and stakeholders, including:

- Paid employees (permanent, temporary and casual)
- Volunteers
- Contractors and consultants
- Board and committee members
- Students on placement and people undertaking work experience
- Children and young people engaged in Bravehearts programs
- Parents, carers and community partners.

It covers all Bravehearts programs and service environments, including but not limited to:

- Ditto's Keep Safe Adventures
- Child protection training and education
- Counselling and advocacy services
- Community campaigns and outreach
- Digital platforms and online engagement.

The strategy applies across all locations and delivery models, including face-to-face, online and mobile services. It is reviewed annually and after any critical incident to ensure ongoing relevance and effectiveness.

Guiding Principles

Bravehearts' approach to child safeguarding is grounded in its mission to make Australia the safest place in the world to raise a child.

This strategy is guided by the following principles:

1. **Bravehearts' 3 Piers to Prevention**	- **Educate:** Every child and young person has the right to personal safety education that is age-appropriate, culturally safe and empowering - **Empower:** Adults are equipped with the knowledge, skills and motivation to protect children and young people and uphold their rights - **Protect:** Systems and environments are designed to respond effectively to risks and disclosures
2. **Child-Centred and Rights-Based**	- Children and young people are recognised as rights-holders with agency, voice and dignity - Bravehearts actively seeks and values the input of children and young people in shaping safe environments and services
3. **Cultural Safety and Inclusion**	- Bravehearts is committed to the cultural safety of Aboriginal and Torres Strait Islander children, young people and families - Programs and practices are inclusive of diverse backgrounds, abilities, identities and experiences

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4. **Self-Determination and Cultural Authority**	• Aboriginal and Torres Strait Islander peoples have the right to lead and shape decisions that affect their children, families and communities
5. **Prevention Through Proactive Risk Management**	• Risks are identified and addressed before harm occurs where possible • Bravehearts uses evidence-informed practices and continuous improvement to strengthen safeguards
6. **Accountability and Transparency**	• Bravehearts maintains clear governance, reporting and review mechanisms • All Bravehearts Officers are accountable for upholding child safety standards and responding to concerns
7. **Alignment with National and State Standards**	• This strategy reflects the National Principles for Child Safe Organisations and the relevant state and territory safeguarding schemes, Child Safe Standards and the Universal Principle • Bravehearts integrates these standards into all aspects of policy, practice and culture.

Governance and Roles

Bravehearts maintains a clear governance structure to ensure accountability, transparency and effectiveness in managing risks to children and young people.

All Bravehearts Officers have a shared responsibility to uphold child safety and wellbeing, with defined roles to support implementation, oversight and continuous improvement of the strategy.

Governance Framework

Bravehearts' safeguarding governance is embedded within its broader Risk Management Framework, which aligns with ISO 31000:2018 and the Child Safe Standards.

Risk management is integrated into strategic planning, operational delivery and organisational culture.

Key Roles and Responsibilities

Role	Responsibilities
National Board	• Provides strategic oversight of child safeguarding risks • Approves the Child and Youth Risk Management Strategy • Monitors high risk incidents and compliance.
Chief Executive Officer (CEO)	• Champions a child-safeguarding culture • Ensures organisational compliance • Reports to the Board on risk and safeguarding matters
Leadership Team/Risk Committee	• Reviews risks and incidents • Implements mitigation strategies • Monitors performance • Reports monthly to the CEO and Board
Risk Officer	• Maintains the Child Safety Risk Register • Conducts audits • Chairs risk meetings • Makes sure documentation and reporting obligations are met
Child Protection and Vulnerable Persons Officer	• Supports the maintenance of the Child Safety Risk Register • Makes sure documentation and reporting obligations are met

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Program Managers/Risk Owners	• Own specific child-related risks • Implement and monitor controls • Justify acceptance of escalation of risks
Employees and Volunteers	• Follow Bravehearts' Code of Conduct and Child Safe Code of Conduct • Report risks, concerns and disclosures • Participate in training and supervision
Children, young people and families	• Are encouraged to participate in feedback • Co-design and review processes to strengthen child safety practices.

Oversight and Reporting
- Monthly reporting to the CEO and Board on child safeguarding risks and incidents
- Quarterly review of the Child Safety Risk Register
- Annual review of the strategy and governance effectiveness
- Escalation protocols for high-risk or unresolved incidents.

Child Safeguarding Code of Conduct

Bravehearts expects all individuals involved in its programs and services to uphold the highest standards of behaviour when interacting with children and young people. This includes staff, volunteers, contractors, board members, students, parents and visitors.

The Child Safeguarding Code of Conduct promotes:
- Safeguarding culture
- Respectful, safe and inclusive interactions
- Clear boundaries and professional behaviour
- Protection of children's rights, dignity and wellbeing
- Equity, inclusion and cultural safety.

All Bravehearts Officers must:
- Champion child safeguarding culture
- Act in the best interests of children and young people
- Model respectful and protective behaviour – including using respectful language and avoiding any behaviour that could be perceived as harmful, inappropriate or exploitative
- Identify, report and respond to safeguarding concerns
- Maintain appropriate supervision and communication
- Participate in continuous learning and reflection
- Comply with Bravehearts' policies on physical contact, transport, privacy, technology use and confidentiality.

Breaches of the Code are managed through Bravehearts breach response procedures.
For detailed behavioural expectations, refer to the Bravehearts Child Safeguarding Code of Conduct. This document outlines specific guidance for different stakeholder groups and includes examples of acceptable and unacceptable behaviour.

Recruitment, Selection, Training and Management

Bravehearts is committed to making sure that all Bravehearts Officers working with children and young people are suitable, supported and adhere to our safeguarding approach.

Our recruitment and workforce practices are designed to minimise risk and promote a child-safeguarding culture.

Key practices include:

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- Child-safe recruitment and selection processes, including advertisements, position descriptions, screening/interview assessments and referee checks
- Mandatory working with children checks compliance
- Comprehensive onboarding programs including required training, including child protection, cultural safety and mandatory reporting
- Ongoing supervision and performance management and support to uphold child safety standards.

For detailed procedures, refer to Bravehearts' Recruitment and Selection Policy, Onboarding Framework and Training Register. These documents outline specific steps, responsibilities and compliance requirements for each stage of the employment lifecycle.

Risk Management Framework

Bravehearts applies a robust and proactive approach to risk management, embedded across all levels of the organisation.

Child safeguarding risks are managed through Bravehearts' overarching Risk Management Framework, which includes:

- A formal Risk Policy and Standard Operating Procedures (SOPs)
- A comprehensive Risk Register covering child safety, service delivery, governance and operational risks
- A structured 7-step risk management process:
    1. Establish context
    2. Identify risks
    3. Analyse risks
    4. Evaluate risks
    5. Treat risks
    6. Monitor and review
    7. Communicate and consult.

This framework supports consistent decision-making, accountability and continuous improvement.

For detailed processes, refer to the Bravehearts Risk Management Framework and associated SOPs.

Risk Identification and Mitigation

Bravehearts takes a proactive approach to identifying and mitigating risks to children and young people across all service environments.

Risks are considered in relation to:
- Physical environments (e.g. counselling rooms, event spaces)
- Digital environments (e.g. online education platforms, social media)
- Relational environments (e.g. staff-child interactions, peer dynamics)
- Program delivery (e.g. outreach, excursions, high-risk activities).

Risks are assessed using Bravehearts' standard matrix, which considers:
- Likelihood of risk occurring
- Impact on the child or young person
- Vulnerability of the child or group affected
- Effectiveness of existing controls.

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Mitigation strategies are aligned with the Child Safe Standards and include:

Standard	Bravehearts
Leadership and Culture	• Child safeguarding is a strategic priority • Board oversight and cultural safety is embedded across all organisational levels and decision-making processes
Voice of Children	• Children's feedback is actively sought and incorporated into program design, service delivery and organisational improvement through age-appropriate consultation mechanisms and feedback systems
Family and Community	• Families are engaged through education and support services
Equity and Diversity	• Programs and services are designed to be culturally responsive and tailored to diverse needs, including specific considerations for Aboriginal and Torres Strait Islander children, CALD communities, and children with disabilities
People	• Rigorous recruitment and selection practices, screening/interview assessments, onboarding and ongoing training of all staff and volunteers, including comprehensive background checks, reference verification, and continuous professional development in child safeguarding
Complaints	• Child-focused, culturally safe, and accessible complaints handling procedures that are trauma-informed and provide multiple reporting pathways with clear escalation processes and external oversight options
Knowledge and skills	• Mandatory child protection training for all Bravehearts Offices during the induction and onboarding process and annually thereafter for roles with direct child contact and regular updates on legislative changes and best practices
Environments	• Regular safety audits of physical and digital environments • Implementation of secure data practices • Appropriate supervision arrangements • Risk management protocols for all child-related activities
Continuous improvement	• Systematic annual reviews of child safeguarding policies • Incident analysis • Stakeholder feedback integration • Evidence-based practice updates with Board reporting and action planning
Policies and Procedures	• Comprehensive child safeguarding policies that reflect current legislative obligations, sector standards, and organisational values, with key safeguarding documents publicly accessible and regularly communicated to all stakeholders

For detailed risk categories, controls and assessment tools, refer to Bravehearts Risk Register and Risk Management SOPs.

Cultural Safety and the Universal Principle

Bravehearts recognises the importance of cultural safety in protecting and empowering all children and young people, particularly Aboriginal and Torres Strait Islander children and young people.

Cultural safety is not just about inclusion, it is about making sure that children and young people feel seen, respected, valued, safe and supported in their identity in every interaction.

Bravehearts embeds the Universal Principle by:

- Respecting the cultural identities and lived experiences of children and families
- Partnering with Aboriginal and Torres Strait Islander communities and organisations in program design and delivery
- Providing ongoing cultural capability training for staff and volunteers
- Making sure policies, environments and practices reflect cultural strength, self-determination and cultural identity, kinship and connection to Country as a protective factor that supports safety, wellbeing, healing.

Cultural safety is a core component of Bravehearts' Cultural Safety Framework and relevant program guidelines.

Handling Disclosures or Suspicions of Harm

All staff and volunteers receive comprehensive training to effectively respond when concerns arise. This training equips Bravehearts Officers to:

Recognition and Assessment

- Identify physical, emotional, sexual and behavioural indicators of harm or abuse
- Understand grooming behaviours and other warning signs
- Recognise the impact of trauma on children's presentation and behaviour
- Assess immediate safety concerns and risk factors

Trauma-Informed Response

- Respond in a calm, supportive and child-centred manner that prioritises the child's emotional safety
- Use appropriate communication techniques that are developmentally and culturally suitable
- Avoid re-traumatising children through inappropriate questioning or responses
- Provide immediate emotional support while maintaining professional boundaries

Reporting and Documentation

- Document observations and disclosures accurately and objectively using approved templates
- Report concerns through Bravehearts' internal reporting pathways within required timeframes
- Make mandatory reports to external authorities including Child Safety Services and Police as legally required
- Follow up on reports and coordinate with relevant agencies as appropriate

Mandatory reporting obligations, including specific timeframes and circumstances, are comprehensively outlined during staff induction and reinforced through annual refresher training.

All Bravehearts Officers understand their individual responsibilities and the organisation's commitment to child protection, regardless of the source or nature of the concern.

Staff are supported throughout the reporting process through supervision, debriefing opportunities, and access to Employee Assistance Programs to ensure their own wellbeing while maintaining professional effectiveness.

For detailed procedures, refer to Bravehearts Child Protection and Reporting Harm Policy, Greater Bravehearts Departments Child Protection and Reporting Harm Procedure and Therapeutic and Support Services Child Protection and Reporting Harm Procedure.

Managing Breaches of the Strategy (Non-Compliance)

Bravehearts defines non-compliance as any deviation from the policies, procedures, or behavioural standards outlined in this Child Safeguarding Strategy, whether intentional or unintentional.

Types of Non-Compliance

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- **Conduct Issues:** Inappropriate behaviour, boundary violations, or actions compromising child safety
- **Procedural Failures:** Late reporting, poor documentation, or inadequate supervision
- **System Gaps:** Non-compliance with screening, training, or risk management requirements

Non-compliance with this Strategy, the Child Safeguarding Code of Conduct, or related procedures is managed under Staff & Volunteer Grievance & Dispute Resolution Policy to ensure an impartial, timely, confidential and fair process grounded in natural justice.

Immediate safety first	• Where risk is identified, proportionate interim measures may be applied (e.g., changed duties/stand-down) while preserving procedural fairness.
Report & record	• Notify your Manager and People & Culture promptly • Document the matter in accordance with internal reporting requirements.
Pathway selection	• Following initial assessment, matters proceed via informal resolution (coaching, facilitation/mediation) or formal investigation led by People & Culture (or an external investigator where needed).
Fair process	• All parties are heard • Support persons are permitted • Victimisation is prohibited • Confidentiality is maintained to the extent possible
Escalation & conflicts	• Complaints about senior roles follow HR005 escalation (e.g., CEO matters to the Board Chair); investigators must be impartial and free of conflicts.
Outcomes & learning	• Outcomes range from training/coaching, mediation and performance management to disciplinary action up to and including termination; unsubstantiated matters may still lead to systemic improvements (e.g., refresher training).
External obligations	• Where conduct may be unlawful or triggers mandatory/reportable duties, Bravehearts notifies relevant authorities in line with child protection policies and legal requirements.

Risk Management for High-Risk Activities and Special Events

Bravehearts identifies and manages activities that present elevated safeguarding risks, including community events, training sessions in unfamiliar venues, activities involving external facilitators or contractors, and any circumstances that deviate from standard operational procedures.

Risk Assessment Process
Each high-risk activity undergoes comprehensive assessment using Bravehearts' risk management process, which systematically addresses:

Risk Identification	Systematic identification of potential safeguarding, operational, and environmental risks specific to the activity
Risk Analysis	Assessment of likelihood and impact, considering participant vulnerability and environmental factors
Control Measures	Implementation of appropriate safeguards, supervision arrangements, and protective protocols

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Approval and Authorisation	Clear approval pathways with designated authority levels for different risk categories
Emergency Preparedness	Development of incident response procedures and emergency contact protocols
Post-Activity Review	Evaluation of risk management effectiveness and identification of improvement opportunities

Enhanced Safeguarding Measures

High-risk activities require additional safeguarding protocols including enhanced supervision ratios, pre-activity briefings for all Bravehearts Officers, clear communication with families about safety measures, and documented risk management plans that are accessible to all relevant staff.

All external Bravehearts Officers involved in high-risk activities must meet Bravehearts' screening requirements and be briefed on child safeguarding expectations before participation.

Compliance with Working with Children Checks

Bravehearts maintains comprehensive compliance with all state and territory Working with Children Check requirements to ensure only suitable Bravehearts Officers have contact with children and young people.

Verification and Management

Valid Clearances	All Bravehearts Officers must hold current Working with Children Checks or approved exemption cards before commencing duties
System Integration	Bravehearts Officers are linked and delinked through relevant state Organisational Portals to enable automated monitoring and notifications
Central Register	A comprehensive register tracks all Bravehearts Officers clearances, including expiry dates, renewal requirements, and verification status
Regulatory Response	All notifications from state regulators are promptly assessed and responded to within required timeframes

Continuous Monitoring

Bravehearts implements ongoing verification processes to ensure sustained compliance, including regular audits of clearance status, proactive renewal management, and immediate response protocols when clearances are suspended, cancelled, or expire.

Bravehearts Officers without valid clearances are immediately restricted from child-related duties until compliance is restored or alternative arrangements are implemented in accordance with regulatory requirements.

Communication and Support Strategies

Bravehearts fosters a culture of safeguarding through clear communication pathways and comprehensive support systems for all stakeholders.

Communication Strategies:
- Induction, Onboarding, and refresher training programs for staff and volunteers
- Regular supervision sessions and ongoing professional development
- Child-friendly materials and accessible feedback mechanisms
- Consistent updates through multiple channels including website, newsletters, posters, and stakeholder meetings

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Support Framework:
- Employee Assistance Programs (EAP) for staff wellbeing
- Debriefing services following critical incidents
- Access to specialised counselling services when needed

Review and Continuous Improvement

This Child Safeguarding Strategy undergoes systematic review to ensure ongoing effectiveness and alignment with best practice standards.

Review Schedule and Triggers

Scheduled Reviews	• Comprehensive annual review incorporating stakeholder feedback and performance data • Bi-annual assessment of key performance indicators and emerging risks
Triggered Reviews	• Following any critical incident involving child safety concerns • In response to changes in legislation, regulations, or sector standards • When organisational restructures or service delivery changes impact safeguarding arrangements • Following external audit recommendations or regulatory requirements

Stakeholder Engagement

Reviews incorporate diverse perspectives through structured consultation with:

Children and Young People	Age-appropriate feedback mechanisms and participation in evaluation processes
Families and Caregivers	Input on service accessibility, cultural safety, and support effectiveness
Staff and Volunteers	Professional insights on implementation challenges and practice improvements
External Partners	Feedback from referral agencies, regulatory bodies, and sector colleagues
Cultural Advisors	Guidance on cultural safety and community responsiveness

Implementation and Communication

Strategy updates are systematically implemented through:
- Documentation of all changes with clear rationale and evidence base
- Targeted communication to relevant stakeholders using appropriate channels and formats
- Staff training and orientation on revised procedures and expectations
- Integration with related policies, procedures, and operational guidelines
- Monitoring of implementation effectiveness and compliance

The continuous improvement process is guided by Bravehearts' Child Safeguarding Organisation Continuous Improvement Plan, which establishes performance indicators, improvement targets, and accountability mechanisms for sustained enhancement of child safeguarding practices.

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Supporting Documents

- Bravehearts Risk Management Framework
- Child Safeguarding Code of Conduct
- Recruitment and Selection Policy
- Child Protection and Reporting Harm Policy/s
- Cultural Safety Framework
- Child Safeguarding Organisation Continuous Improvement Plan
- Staff & Volunteer Grievance & Dispute Resolution Policy

Definitions

Bravehearts Officers	All individuals associated with Bravehearts including paid employees (permanent, temporary and casual), volunteers, contractors and consultants, board and committee members, students on placement and people undertaking work experience.
Child	A person under the age of 18 years.
Child Safe Standards	National or state/territory frameworks that establish minimum standards for creating child-safe organisations and protecting children from harm.
Child Safeguarding	The responsibility and actions taken by organisations to protect children from harm, abuse, neglect and exploitation through prevention, early identification, response and support.
Cultural Safety	An environment that is spiritually, socially and emotionally safe, as well as physically safe for children and families; where there is no assault, challenge or denial of their cultural identity and experience
Culturally and Linguistically Diverse (CALD)	Communities with diverse cultural backgrounds and languages other than English.
Disclosure	When a child or young person reveals that they have experienced harm, abuse or neglect, either directly or indirectly.
Harm	Any detrimental effect of a significant nature on a child's physical, psychological or emotional wellbeing, whether caused by a single act, omission or circumstance, or a series or combination of acts, omissions or circumstances.
High-Risk Activities	Activities that present elevated safeguarding risks including community events, training sessions in unfamiliar venues, activities involving external facilitators or contractors, and circumstances that deviate from standard operational procedures.
Mandatory Reporting	The legal requirement for certain professionals to report suspected child abuse and neglect to relevant authorities within specified timeframes
Non-Compliance	Any deviation from the policies, procedures, or behavioural standards outlined in the Child Safeguarding Strategy, whether intentional or unintentional.
Risk	The potential for harm to occur to children and young people in physical, digital or relational environments.
Risk Management	The systematic process of identifying, analysing, evaluating, treating, monitoring and communicating risks to children and young people.
Trauma-Informed Practice	An approach that recognises and responds to the impact of trauma on children, emphasising physical, psychological and emotional safety while promoting healing and recovery.
Universal Principle	The principle that Aboriginal and Torres Strait Islander children and families achieve safety, wellbeing and connection to family, community, culture and Country.

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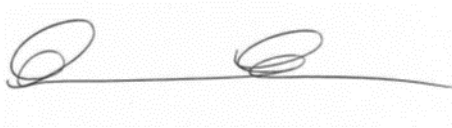
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Working with Children Check	Mandatory screening processes in each state and territory that assess a person's suitability to work with children, including criminal history and other relevant information.
Young Person	A person aged between 12-25 years, recognising the extended developmental period and transition to adulthood.

Acronyms	
CALD	Culturally and Linguistically Diverse
CEO	Chief Executive Officer
EAP	Employee Assistance Program
ISO	International Organisation for Standardisation
SOP	Standard Operating Procedure

Authorisation

Alison Geale
CEO
September 2025

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