



Lions Eye Health Program
Australia

Child Safe Policy

INDEX

1	Definitions	page 2
2	Objectives	page 4
3	Scope	page 4
4	Commitment	page 5
5	Code of Conduct	page 5
6	Working With Children's Check	page 6
7	Approach to Safety	page 7
8	Child Safe Officer	page 8
9	Reporting	page 8
10	Who Reports Abuse	page 9
11	What Needs to be Reported	page 10
12	Investigating	page 11
13	Record Keeping	page 11
14	Response to a Complaint	page 11
15	Privacy	page 13
16	Risk Management	page 13
17	Review Dates	page 14
18	Adoption of Policy	page 14

1 DEFINITIONS

Child means a child or young person who is under the age of 18 years.

Child Protection means any responsibility, measure or activity undertaken to safeguard children from harm.

Child Abuse means

- a sexual offence committed against, with or in the presence of a child, whether or not a criminal proceeding in relation to the offence has been commenced or concluded, or
- sexual misconduct committed against, with or in the presence of a child, or
- physical violence committed against, with or in the presence of a child, or
- any behaviour that causes significant emotional or psychological harm to a child or significant neglect of a child.

Child Sexual Assault is any act which exposes a child to, or involves a child in, sexual processes beyond his or her understanding or contrary to accepted community standards. Sexually abusive behaviours can include the fondling of genitals, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling of breasts, voyeurism, exhibitionism, and exposing the child to or involving the child in pornography. It includes child grooming, which refers to actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a child to lower the child's inhibitions in preparation for sexual activity with the child.

Reasonable Grounds for Belief is a belief based on reasonable grounds (see below) that child abuse has occurred when all known considerations or facts relevant to the formation of a belief are taken into account and these are objectively assessed. Circumstances or considerations may include the source of the allegation and how it was communicated, the nature of and details of the allegation, and whether there are any other related matters known regarding the alleged perpetrator.

A reasonable belief is formed if a reasonable person believes that:

- the child is in need of protection, or
- the child has suffered or is likely to suffer significant harm as a result of physical injury, or
- the parents are unable or unwilling to protect the child.

A “reasonable belief” or a “belief on reasonable grounds” is not the same as having proof, but it is more than mere rumour or speculation.

A “reasonable belief” is formed if a reasonable person in the same position would form the belief on the same grounds. For example, a “reasonable belief” might be formed if:

- a) a child states that they have been physically or sexually abused
- b) a child states that they know someone who has been physically or sexually abused (the child may be talking about themselves)
- c) someone who knows a child states that the child has been physically or sexually abused
- d) professional observations of the child’s behaviour or development leads a professional to form a belief that the child has been physically or sexually abused or is likely to be abused
- e) signs of abuse lead to a belief that the child has been physically or sexually abused.

2 OBJECTIVES

The aim of this policy is to protect children and young people whilst they participate in the Lions Eye Health Program. This will be done by providing an explicit structure for when working with children and young people. It will explain:

- a) Procedures for working with children and young people.
- b) Education in child safe conduct for both children, young people, and Lions members.
- c) How allegations of abuse will be managed.
- d) How incidents are managed and reported

3 SCOPE

Although this policy has allowed for the most stringent of State or Territory child-protection related acts it is unable to account for any future legislative changes and it will therefore be reviewed annually to ensure that the Lions Eye Health Program maintains a very high standard of compliance.

For the purpose of this policy any individual regardless of their age, participating in the Lions Eye Health Program will be covered by this policy but may have different statutory responses. In particular, the rules around obtaining a Working with Children clearance varies from

State to State.

Although this policy relates to activities conducted directly under the auspices of the Lions Eye Health Program, Clubs and Districts operating any other Youth Project may adopt this policy and establish their own procedures consistent with this approach and the legislative arrangements in their State jurisdiction.

4 COMMITMENT

The Lions Eye Health Program (LEHP) is committed to promoting and protecting the interests and safety of children. All children, regardless of their gender, race, religious beliefs, age, disability, sexual orientation, or family or social background, have equal rights to protection from abuse. The program has zero tolerance for child abuse. LEHP is thereby committed to complying with the compulsory minimum standards for organizations that provide services for children and young people (or are used by children and young people), to help protect them from harm.

Everyone involved with LEHP is responsible for the care and protection of children and reporting information about child abuse.

Child protection is a shared responsibility between LEHP staff, volunteers, associates, and members of the LEHP community.

LEHP will consider the opinions of children and use their opinions to develop child protection policies.

LEHP supports and respects all children, staff and volunteers.

5 CODE OF CONDUCT

Lions Clubs International is a highly respected organisation through its excellent work in the community and overseas projects. Its logo is highly recognisable, and members are often seen in the wider community performing much needed beneficial tasks and as such members are proud of their achievements. Given this, it is important for both members and the community to maintain confidence in Lions activities.

A significant part of maintaining this confidence is for all members to adhere to a Code of Conduct. Therefore, the following matters are reasonable expectations placed upon Lions when working with children.

Lion members and volunteers shall: -

- a At all times whilst at a Lions Eye Health event wear a Lions Identification badge, pass or lanyard.
- b At all times take all reasonable steps to protect children and young people in their care.
- c Not develop a relationship with a child or young person that could be misconstrued as grooming behaviour by others.
- d Not develop a relationship with a child or young person that could threaten the child or young person's safety or wellbeing.
- e Not disclose a child's or any other persons private information other than within the obligations of the Child Safe Policy.
- f Be accepting of all children and young people in their care regardless of ethnicity, religious beliefs, or gender identification.
- g Always treat children and young people in their care with respect.
- h Always act in accordance with the Lions Australia Child Safe Policy.
- i Never offer alcohol or illicit drugs of any kind to a child or young person.
- j Never be under the influence of alcohol or illicit drugs whilst in the position of care or responsibility of a child or young person.
- k Never expose children or young people to pornographic material from any medium.
- l Always know where the child or young person is when in their charge.
- m Never intimidate a child or young person through tone of voice or verbally abusive language.
- n Report any breach of the code of conduct through the Lions Feedback and Enquiries form located on the website here. <https://lionsclubs.org.au/keep-in-touch/feedback>
- o Uphold, respect, and protect those members and volunteers who in good faith report a breach of this code.
- p Any breach of the Child Safe Policy may result in action by the members Lions club to restrict the member's activities or to suspend or cancel their membership.

6 WORKING WITH CHILDREN CHECKS

The 'Working with Children Check' refers to the government-regulated system in each State and Territory where individuals working with children can apply to be screened for voluntary or paid employment to enable them to work with children. It involves a national criminal history check and a review of findings of workplace misconduct.

It only identifies individuals who have come to the attention of authorities and must therefore be used in conjunction with sound, risk management processes and local checks.

All Lions and other adults, including Lions' partners/family members and volunteers, having **DIRECT** contact with young people under the age of 18 years involved in the Lions Eye Health Program in their State or Territory must comply with Section 8 of the MD 201 Child Safe Policy (*see below*).

Clubs should maintain a Working with Children Check Register, which contains the name, date of birth, registration number and expiration date of all members who have a WWCC. Any members who refuse to undergo a Working with Children Check, or their State or Territory's equivalent, will not be permitted to be directly involved in the Lions Eye Health Program.

The appointed Child Safety Officer within the club is the person responsible at Club level for ensuring a WWCC register is maintained.

Section 8 MD201 Child Safe Policy.

A Working with Children Check is a criminal screening check. It aims to prevent people who may pose a risk to children or youth from coming into contact with them through their employment or in a voluntary capacity.

- a even though, in most States a Working with Children Check_or its equivalent is only required for longer term work with young people, it is Lions Policy that any member of any Club operating Youth Programs who has direct involvement with young people, obtain a Working with Children Check or equivalent in their State
- b Lions operating any youth program must appraise themselves of the legislation in their State.
- c the Working with Children Check_register must contain the name, date of birth, registration number and expiration date. If third party verification is required, as in NSW, the date and outcome of that verification should be indicated.
- d The Child Safe Officer must maintain the Working with Children Check Register noting that this position may be held concurrently with other roles. The Club President or District Governor should not hold the role of Child Safe Officer as they may be engaged in future investigations.
- e where a number of youth programs are conducted, it is reasonable to maintain a single WWCC Register to cover all programs.
- f it is highly desirable to eliminate risks to young people participating in a Lions Youth program through following the Child Safe policy rather than rely on a Working with

Children Check and operators of Youth Projects should prepare a documented risk management plan for each activity.

Some jurisdictions restrict the obtaining of a Working with Children clearance to very specific circumstances. If the State authority refuses to process a Working with Children check, the Lions Club will maintain a written record of such refusal.

7 LEHP's APPROACH TO CHILD SAFETY

In continuing to implement and promote a child-safe system of work, LEHP will:

- a develop an environment in which children feel listened to and valued, and in which their concerns are acted upon, including encouraging and allowing children to participate in decisions important to them
- b consult with staff and other appropriate parties, including families and children
- c assess and manage the risk of abuse to children who interact with LEHP including through recruitment practices and online
- d take a proactive approach to child safety, including fostering a culture of openness that encourages all staff to report any concerns of child safety and supports them in this process
- e report suspected abuse, neglect or mistreatment promptly to the appropriate authority, whether or not the law requires reporting
- f ensure children know the options available to them if they are concerned or feeling unsafe, and foster an environment where children are safe to raise such concerns
- g recruit staff who are suitable to work with children and provide high quality training, supervision and professional development to staff
- h have policies, procedures and supports in place to reflect these commitments, and review these regularly.

8 CHILD SAFE OFFICER (CSO)

Each Lions Club and District needs to have a designated position of Child Safe Officer (CSO) and that a Lions member be appointed to that position. Refer to **Section 15 & 16 of the MD201 Child Safe Policy**

9 REPORTING

Any form of sexual, physical, emotional abuse or negligence as described in the definitions. If you are the person to whom the allegations have been disclosed or you have been made aware of the allegations, it is critical you do not excessively question the child or young person.

Interviewing is for the purpose of understanding the nature of the allegations and ensuring safety. Excessive interviewing can be traumatic for a victim and may inadvertently compromise the evidence and any further evidence may be deemed inadmissible in a court due to perceived coaching or rehearsing.

All pertinent conversations with the child or young person and relevant other parties need to be documented in an impartial manner and with reference to as many direct quotes as possible. Good documentation helps prevent the child from having to repeat the story.

Report any allegations of child abuse or neglect to the Child Safe Officer responsible for the program who will action the Lions Child Safe Procedure (Appendix 1) and complete the Child Safe Incident Report Form directly (Appendix 3), or with the assistance of the Child Safe Officer.

Once a child or young person has made a disclosure keep them safe and reassure them they have done the right thing in disclosing and that any allegations of abuse are not their fault.

Professional independent counselling should be offered to any child or young person and their families where an allegation of abuse has been made noting that the records from these sessions are subject to subpoena.

All staff and volunteers are responsible for reporting child safety concerns to their supervisor or LEHP's child safety officer as soon as possible after receiving such information or forming a belief that a child is at risk.

In situations where the supervisor or Child Safety Officer is suspected of involvement in the activity, or if the person having the suspicion does not believe that the matter is being appropriately addressed or dealt with, the matter should be reported to the next highest level of supervision.

10 WHO REPORTS ABUSE

A member may become aware of an allegation or incident of abuse by numerous means such as observation, face-to-face, telephone, social media, text etc.

All immediate safety concerns are to be reported to the Police by any Lion member as a matter of priority. When the allegation is received by the relevant Child Safe Officer and where immediate safety has been assured the

MD Child Safety Officer activates the Lions Child Safe Procedure (Appendix 5) and completes the Child Safe Incident Report Form. (Appendix 3).

The report should be completed at the program level. This means a report for a club activity is completed by the Club Child Safe Officer or program leader, and a District activity by the District CSO or District Program chair.

Note the general reporting structure in the charts. (Appendix 4)

Please Note:

So long as a report has been made in good faith, legislation in all States and Territories protects reporters, therefore no criminal, civil or administrative proceedings can be brought against them

11 WHAT NEEDS TO BE REPORTED

Participants must report complaints of suspected abusive behaviour or misconduct to the program manager and also to any external regulatory body such as the police.

If any staff member or volunteer has a reasonable belief that reportable conduct may have occurred, then they must report the incident to the Child Safe Officer directly and immediately. If the incident potentially involves a criminal offence, the incident must also be reported to the police or by calling 000 after consulting with the Child Safe Officer if reasonably practicable.

Reportable conduct includes the following incidents:

- a a sexual offence committed against, with or in the presence of, a child, whether or not a criminal proceeding in relation to the offence has been commenced or concluded
- b sexual misconduct committed against, with or in the presence of a child
- c physical violence committed against, with or in the presence of a child
- d any behaviour that causes significant emotional or psychological harm to a child
- e significant neglect of a child.

Where a law enforcement agency is seeking to investigate child safety concerns, staff members must co-operate to the best of their ability.

LEHP's Child Safe Officer shall be the current Chair of the National Management Committee whose contact details can be obtained from the National program manager or as published by Lions Australia.

LEHP also works to ensure all children, young people, families and staff understand their obligations and know who to tell if they observe abuse, are a victim, or notice inappropriate behaviour.

It is the responsibility of all Lions Australia Club members to report abuse if they:

- a witnessed the alleged abuse.
- b were informed of the alleged abuse by another member and it had not been reported.
- c were informed of the alleged abuse by the child or young person who was the victim.
- d were informed of the alleged abuse by a child or young person who was not the victim.
- e were informed of the alleged abuse by a non-member of Lions Australia.

12 INVESTIGATING

If the appropriate child protection service or the police decide to investigate a report, all employees or volunteers must co-operate fully with the investigation.

Whether or not the authorities decide to conduct an investigation, the program manager will consult with the authorities to determine whether an internal investigation is appropriate. If it is decided that such an investigation will not conflict with any proceeding of the authorities, the program manager may decide to conduct such an investigation. All employees and volunteers must co-operate fully with the investigation.

Any such investigation will be conducted according to the rules of natural justice.

The program manager will make every effort to keep any such investigation confidential; however, from time to time other members may need to be consulted in relation to the investigation.

After an initial review and a determination that the suspected abuse warrants additional investigation, the program manager shall coordinate the investigation with the appropriate investigators and law enforcement officials. Internal or external legal representatives will be involved in the process as deemed appropriate.

13 RECORD KEEPING

The Royal Commission into Institutional Responses to Child Sexual Abuse recommends that all documentation relating to child abuse be held in archives for 45 years.

Each program has unique needs and requirements with respect to record-keeping. The National Chairperson of each program is responsible for meeting these record-keeping responsibilities.

Such information will be archived at the National Office annually.

14 RESPONSE TO COMPLAINT

If it is alleged that a staff member or volunteer may have committed an offence or breached the organization's policies or its Code of Conduct, the person concerned may be stood down (with pay, where applicable) while an investigation is conducted.

If the investigation concludes that on the balance of probabilities an offence (or a breach of the organization's policies or Code of Conduct) has occurred then disciplinary action may follow, up to and including dismissal or cessation of involvement with the organization. The findings of the investigation will be reported to any external body as required.

All reports regardless of where they are received are to be forwarded to the MD201 Child Safe Officer who will instigate the Allegations of Historical Child Abuse Procedure as illustrated in The Historic Child Abuse Complaints Flowchart (Lions Child Safe Policy Appendix 2).

The Child Safe Officer will ascertain if the allegations involve a current Lion member and if there are any current child safety issues.

If the alleged perpetrator has access to under 18-year-olds, the Child Safe Incident Report Form 1 must be completed and forwarded to the National Office Executive Officer.

As noted in Child Safe Incident Report Form 1, any immediate safety concerns are to be referred to the Police and relevant Statutory Authorities.

Where there are no identified current child protection concerns and the allegations are reported by the alleged victims the following procedures will take place:

- a The Executive Officer will write to the alleged victims.

Initially:

- 1 requesting confidential details of the complaint and requesting advice as to what remedy is being sought.
- 2 reassuring the victim or survivor they did the right thing in reporting the matter.
- 3 explaining the likely process, people involved, the anticipated time frame and what will be required of the

victim or survivor

Subsequently:

- 1 identifying the accountable organisation within Lions for the allegation.
 - 2 offering referral to any necessary medical treatment and psychological support and counselling.
 - 3 offering a trusted adult, independent support person and/or advocate to assist them.
 - 4 explaining the options that may arise from a complaint; for example, breach of code of conduct and/or criminal charges. Avoiding making the victim or survivor repeat their account of what happened.
-
- b. Subject to the nature of the allegation, it is likely that the complainant will need to be referred to the Lions Club of which the alleged perpetrator is a member.
 - c. In most circumstances, the complainant will be asked to report the matter to the police to ensure that an appropriate investigation can take place.
 - d. The Executive Officer will continue to communicate throughout on the investigation's progress and any resulting court proceedings or results of any other investigation (noting that if the police are also investigating the matter, this communication should only be carried out in consultation with the police).
 - e. MD201 strongly recommends all parties (alleged victim and alleged perpetrator) seek independent legal advice if appropriate. MD201 is not in a position to furnish any legal advice and cannot do so.
 - f. The Policy acknowledges that each Lions Club is autonomous and that the rights, privileges, and responsibilities of membership are matters for the sole determination of the Board of Directors of each Club. Neither the Council of Governors nor any District Governor has the authority to direct the Board of Directors of any Lions Club to act in relation to such matters. In accordance with section 19 of the Child Safe Policy, the alleged perpetrator may be requested by their club to stand aside from Lion duties for the duration of any investigation
 - g All documentation once completed is to be forwarded to the Executive Officer for possible actioning, registering and archiving

15 PRIVACY

LEHP will respect the privacy of the individuals involved unless there is a risk to someone's safety. LEHP will have safeguards and practices in place to ensure that any personal information considered or recorded remains confidential.

In accordance with privacy laws, everyone is entitled to know how the personal information will be recorded, what will or can be done with it, and who may be able to access it.

16 RISK MANAGEMENT

LEHP will ensure that child safety is a part of its overall risk management approach by complying with the Lions Eye Health Risk Management program.

The LEHP National Management Committee is committed to identifying and managing risks as part of a regular risk and compliance review. The committee members will receive regular training in relation to child safety

17 REVIEW DATES.

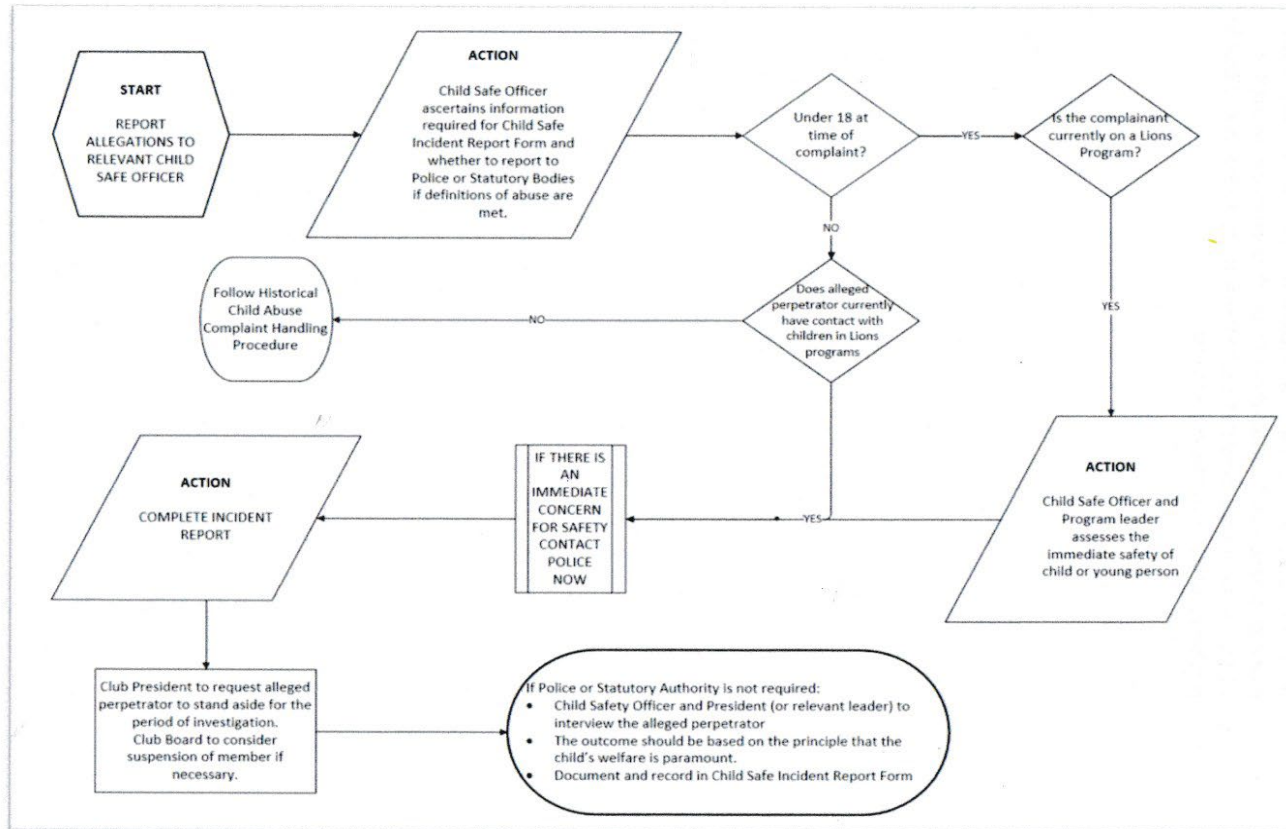
Lions Australia understands that at some time State and Territory legislation will be reviewed in light of the Royal Commission into institutional responses to child sexual abuse (RCIRCSA). This Policy will operate on the understanding that all of the standards stated in the RCIRCSA shall be implemented nationally. This policy shall be reviewed annually by the LEHP National Management Committee

18 ADOPTION OF THIS PROCEDURES

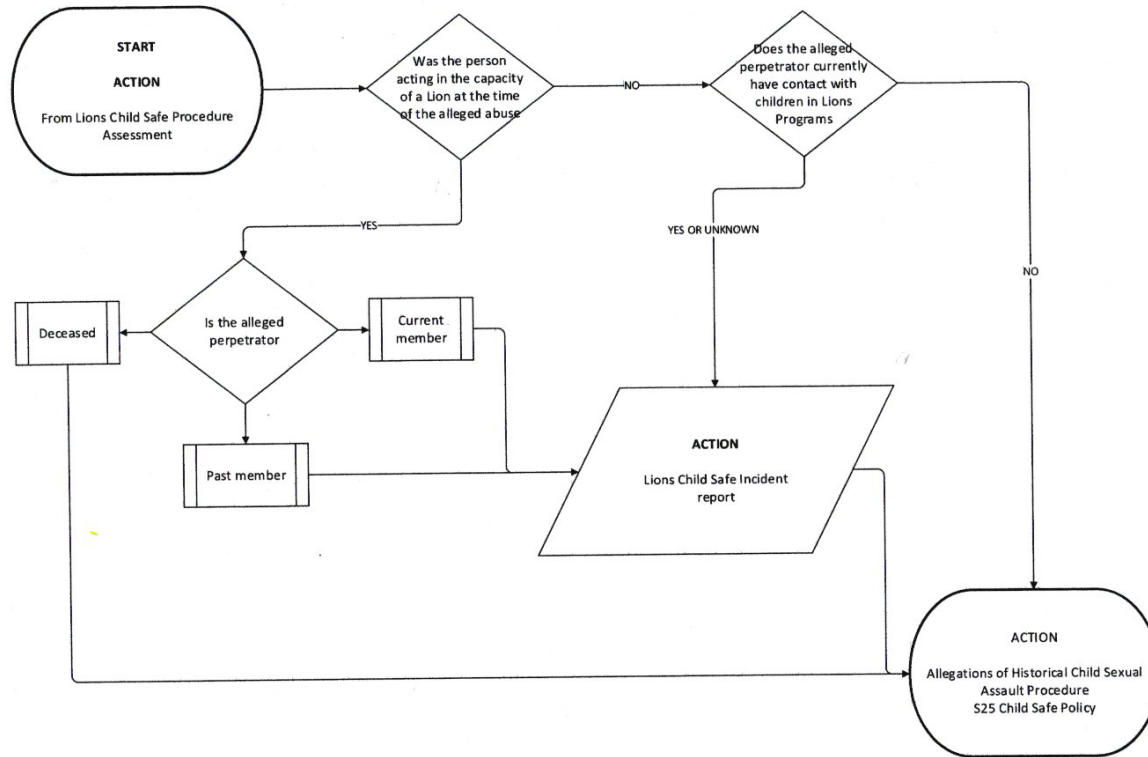
This policy was adopted by the Lions Eye Health Program National Management Committee on



APPENDIX 1 - CHILD SAFE PROCEDURE



APPENDIX 2 - ALLEGATIONS OF HISTORICAL CHILD ABUSE PROCEDURE



Revision No.	4.0	Relates to:	MD201 Youth Programs
Revision Date	25 March 2022	Applies to	Leos, YOTY, Youth Exchange
Author	Rob Oerlemans	Authorised by	Legal Officer

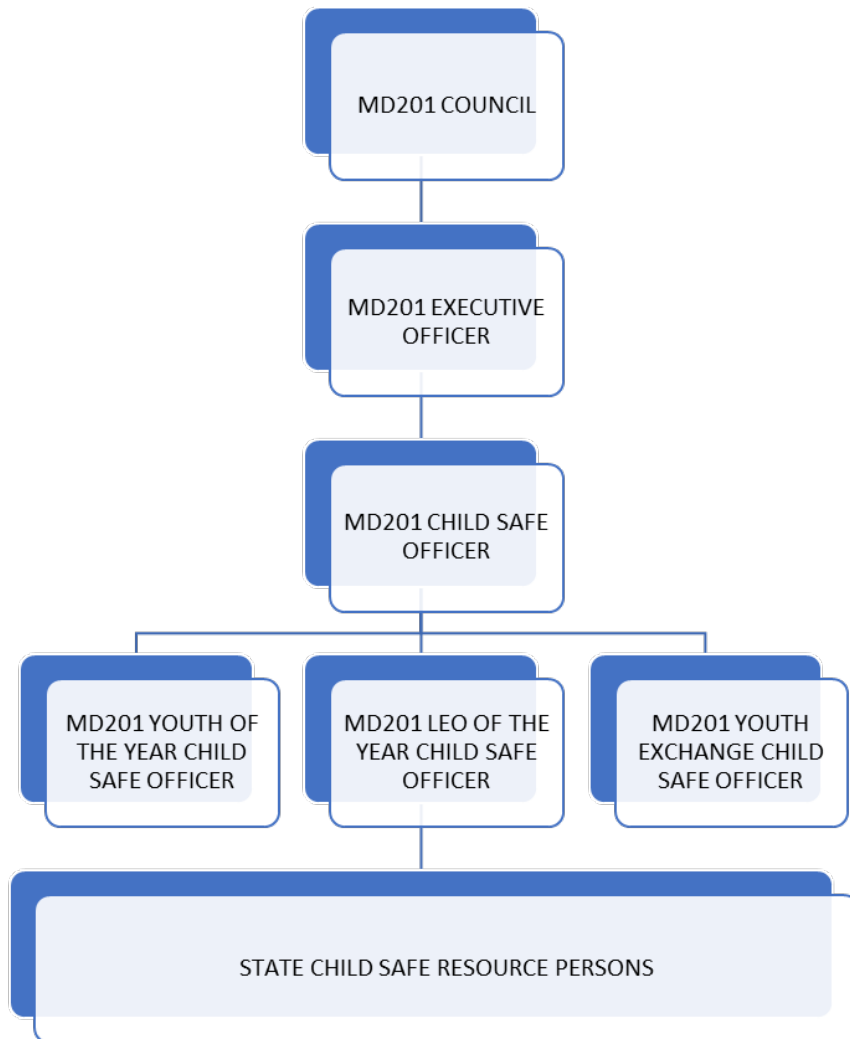


APPENDIX 3 - CHILD SAFE INCIDENT REPORT FORM

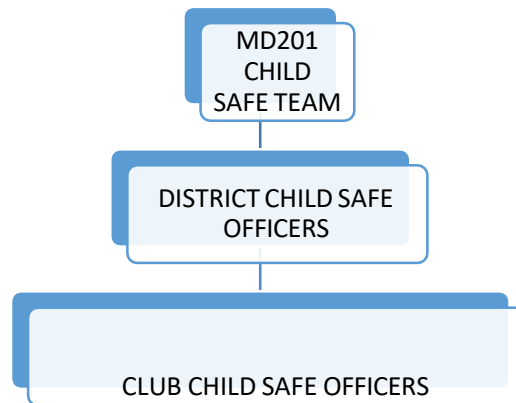
To be completed by the Club Child Safe Officer.	
<i>NOTE: - ALL IMMEDIATE SAFETY CONCERNS ARE TO BE REPORTED TO THE POLICE BY ANY MEMBER AS A MATTER OF PRIORITY.</i>	
Lions District & Club Name	
Details of Child or Young Person if known.	Name: _____ Age: _____
	DOB: _____
Program (circle)	Youth Exchange Leo YOTY Other (Name)
Reported by	Name: _____ Date & Time reported: _____
	Address and Contact Details: _____
Reported to (if different from above)	Name: _____
	Address and Contact Details: _____
Incident Location (if known)	Incident Date & Time: _____
Person/s involved in incident	Name/s: _____
Description of allegation.	
Immediate actions taken and by whom. State reason if no action taken.	
Witness/es (if any)	Name & Contact Details: _____
Outcome of allegation if known at this stage.	

APPENDIX 4 - CHILD SAFE STRUCTURE

25.5 MD201 CHILD SAFE TEAM



25.6 EXTENDED CHILD SAFE STRUCTURE





APPENDIX 5 - REPORTING A CHILD SAFETY INCIDENT OR CONCERN

Child Safe issues ideally must be reported by a Lions or Lion Volunteer who has, as an individual, witnessed the event, to a Child Safe Officer Depending on the program, this may be either a Club or District Child Safe Officer.

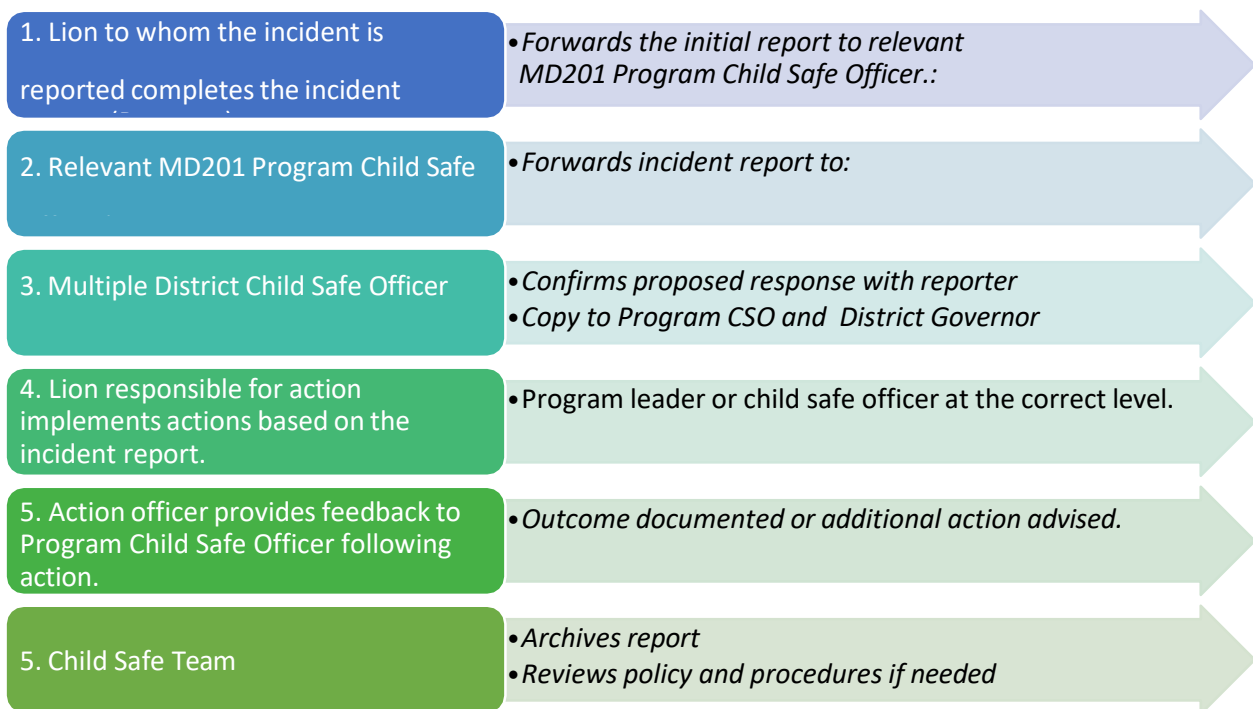
It is important that the investigation and report are conducted immediately when the allegation is made or the incident occurs. The only matter that takes precedence is ensuring the immediate safety of the young person.

The chart below describes the procedure.

In summary, once the report is completed, it is escalated through the Child Safe Officer structure where the recommended actions are endorsed.

Once actioned, the final report is provided to the Child Safe Officer for archiving in the official record system.

Note: If the relevant Child Safe Officer is not available, the report should be escalated immediately to the more senior officer so the matter can be dealt with, without delay.



*Youth Exchange, Youth of the Year or Leo Program Child Safe Officer.

It is important that the incident report is completed by a Lion with close proximity to the alleged incident. If the incident occurred at a club activity, that could be the club child safe officer, Constitution and By-Laws Chairperson or Program Leader. In appointing a person, one should be careful to exclude any club member that may be included in a future investigation

APPENDIX 6 – YOUNG PEOPLE IN LIONS HOW I CAN MAKE A COMPLAINT?

Please remember you have the right to be treated with respect!

The following telephone numbers, web addresses and emails are for you to use if at any time you feel either under threat of abuse, neglect or grooming by either a Lion or a Lion volunteer.

Lions Australia and its clubs are committed to providing a child safe environment for all young participants. If at any time you feel concerned you can reach out to a Lions Advisor for help, or consider these other avenues.

- **If you feel your life is in danger or you have concerns for your immediate safety,**
Call 000 now.

- **Lions Australia Executive Officer**
Telephone free to call: 1800 655 201
Email: CustomerService@lions.org.au

- **Kids Helpline for Teens**
<https://kidshelpline.com.au/teens>

- **Kids Helpline for Young Adults**
<https://kidshelpline.com.au/young-adults>

- **eSafety Commissioner**
<https://www.esafety.gov.au/report>