



Child Safe & Vulnerable People Policy

Version 1.3

Approved 10 March 2026

1. Purpose

The purpose of the Child Safe and Vulnerable Persons Policy (the policy) is to demonstrate Mental Health First Aid International's (MHFAI) commitment to the safety and wellbeing of children, young people and vulnerable people.

2. Scope and Application

This Policy applies to all MHFAI employees, Board Directors, contractors, volunteers, trainers, instructors and visitors (referred to in this Policy as **workplace participants**) and their conduct in the **workplace**.

In this Policy, **workplace** means all activities in connection with the work of MHFAI, including but not limited to:

- Work at MHFAI's premises;
- Related dealings for MHFAI outside MHFAI premises;
- Functions, conferences and events;
- Work-related travel;
- Electronic communications and social media, including out-of-hours communications; and
- Dealings with stakeholders, customers, visitors, job applicants, service providers and the public.

This policy outlines the responsibilities of all workplace participants in ensuring the safety and wellbeing of children, young people and vulnerable people in the course of their duties. The policy establishes MHFAI's expectations of all workplace participants and provides practical guidance for embedding safe practices into the organisation in a comprehensive and systemic manner.

This policy applies to all workplace participants whose duties involve, result in, or relate to contact with children, young people or vulnerable people. Workplace participants are required to adhere to the *Commonwealth Child Safe Framework*, relevant state/territory child safety and vulnerable people legislation, and all relevant responsibilities outlined in this policy.

Service providers engaged by MHFAI to deliver services to children, young people and vulnerable people (e.g., contracted trainers, sub-contractors and instructors) must have terms

and conditions in their contracts and agreements pertaining to child and vulnerable people safety, must comply with these terms and conditions, and these are to be no less rigorous than this policy and must meet the requirements of the relevant legislation.

3. Policy or Protocol Statement

MHFAI is committed to providing a safe environment that protects all children, young people and vulnerable people from harm or risk of harm and that upholds the rights of children, young people and vulnerable people to feel and be safe. MHFAI does not permit or tolerate any risk of harm, or forms of child abuse, neglect or exploitation. MHFAI values and respects children, young people and vulnerable people and welcomes them regardless of their abilities, sex, gender, or social, economic or cultural background. Bullying and harassment is not tolerated.

MHFAI is committed to complying with the [Commonwealth Child Safe Framework](#) the [National Principles for Child Safe Organisations](#), and the relevant state/territory legislation. MHFAI is committed to adopting the 10 national principles of the *Commonwealth Child Safe Framework* through information, training and procedures that influence and contribute to an environment that supports the safety of children and young people.

3.1 This policy is guided by the following principles:

- Establishing clear processes to minimise the risk of harm to children, young people and vulnerable people at MHFAI (including online) and when participating in activities by providing child safe environments.
- Taking appropriate steps to identify all positions that involve, or are likely to involve, working with children, young people and vulnerable people.
- Ensuring any workplace participant in a prescribed position holds a current and valid Working with Vulnerable People (WWVP) and/or Working with Children Check (WWCC).
- Monitoring prescribed positions to ensure the occupants hold valid WWVP/WWCC.
- Not employing workplace participants in prescribed positions without a current and valid WWVP/WWCC.
- Complying with legislative responsibilities to notify relevant authorities of matters relating to child safety. Where allegations of reportable conduct or safety concerns occur, these will be taken seriously and acted upon in accordance with MHFAI policies, procedures and relevant legislation.
- Providing support and information to workplace participants to maintain MHFAI as a child safe environment and foster an understanding of individual and organisation obligations for child safety, protection and reporting obligations.

4. Definitions

Child, children or young person(s) - Means any human under the age of 18 years.

Child exploitation - One or more of the following:

- a) committing or coercing another person to commit an act or acts of abuse against a

child

- b) possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material
- c) committing or coercing another person to commit an act or acts of grooming or online grooming
- d) using a minor for profit, labour, sexual gratification or some other form of personal or financial advantage.

Child protection - An activity or initiative designed to protect children from any form of harm, particularly that arising from child exploitation and abuse.

Child-related work - Means being engaged in:

- a) work activities where contact (physical, face-to-face, oral, written or electronic contact) between a staff member or volunteer and a child would reasonably be expected as a normal part of the work and such contact is not occasional and incidental to the work, or
- b) work that requires a Working with Vulnerable People (WWVP) or Working with Children Check (WWCC) in the state or territory jurisdiction in which the work is being undertaken.

For the purposes of this definition, occasional means infrequently or irregularly, and incidental means occurring by chance.

Criminal Record Check or National Police Check - Involves comparing an individual's details against a central index of names using a name matching algorithm to determine if the name and date of birth combination of that individual matches any others who have police history information. The name is then vetted by police personnel to determine what information may be disclosed, subject to relevant legislation and/or information release policies.

Cultural safety - An environment where culturally diverse people feel safe and secure in their identity, culture and community.

Emotional abuse - A parent or caregiver's inappropriate verbal or symbolic acts towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability. Such acts of commission or omission are likely to damage a child's self-esteem or social competence.

Harm - A reference to harm will be taken to be a reference to physical harm or psychological harm (whether caused by an act or omission) and includes such harm caused by sexual, physical, mental or emotional abuse or neglect. Psychological harm does not include emotional reactions such as distress, grief, fear or anger that are a response to the ordinary

fluctuations of life.

Mandatory reporting - Mandatory reporting is the legislative requirement for selected classes of people to report suspected child abuse and neglect to government authorities. Each state and territory has [legislation](#) about mandatory reporting. Consideration of mandatory reporting is contingent upon which state the alleged incident was reported to occur and the state where the reporter is based.

National Police Certificate - A document that lists an individual's disclosable court outcomes and pending charges sourced from the databases of all Australian police services.

Neglect - 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 as being essential for the physical and emotional development and wellbeing of the child.

Physical abuse - The use of physical force against a child that results in harm for the child's health, survival, development or dignity. This includes hitting, beating, kicking, shaking, biting, strangling, scalding, burning, poisoning and suffocating.

Reasonable suspicion - A reasonable suspicion or belief may arise when:

- a) a child discloses that he or she has been abused
- b) someone close to a child (for example, sibling, relative, close friend) discloses abuse on behalf of that child abuse, or evidence of abuse, is witnessed.

Sexual abuse - The use of a child for sexual gratification by an older or significantly older child, adolescent or adult.

Vulnerable person - A child or an adult who is disadvantaged and accessing a regulated activity in relation to the disadvantage. Examples of a disadvantaged adult include an adult with a physical or mental disability, who suffers financial hardship and/or who cannot communicate or has difficulty communicating in English.

Working with children or vulnerable people - Being engaged in an activity with a child or vulnerable person where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. This includes volunteering or other unpaid work.

Working with Children Check or Working with Vulnerable Person Check - An assessment of whether a person poses an unacceptable risk to children. As part of this process, the applicant's criminal history, child protection information and other information is checked. A Working with Children Check may also be known under other names, such as a Working with Vulnerable People Check, a Blue Card, Working with Children Clearance or Ochre Card.

5. Responsibilities

All Workplace Participants	All staff and volunteers are expected to be active participants in maintaining a safe environment for children, young people, and vulnerable people consistent with the <i>MHFAI Code of Conduct</i>, and other relevant policies. • Treat all children and vulnerable people with respect. • Those who undertake child related work must complete induction and training on child safe behaviours and responsibilities and comply with all requirements of this policy. • Comply with the applicable state, territory and Commonwealth legislation. • Be aware of and comply with this policy and the <i>National Principles for Child Safe Organisations</i>. • Appropriately report potential breaches of this policy. • Must maintain, comply with and renew their WWVP/WWCC registration within the required timeframe of their relevant state/territory legislation. • Must inform MHFAI of any change to their circumstances that would impact their eligibility for registration under WWVP/WWCC. • Understand their personal obligations and responsibilities when capturing, managing and maintaining information, especially those relating to children.
People and Culture	• Work with Managers to Identify positions undertaking child or vulnerable people related work. • Ensure staff and volunteers that undertake child or vulnerable people related work: ○ maintain a suitable National Police Check and WWVP/ WWCC registrations, as appropriate to the states or territories the person will be working in. ○ complete relevant induction and training related to working with children and young people. • Maintain a local register of WWVP/WWCC registrations and the ongoing compliance of mandatory induction and training. • Work with business areas, as required, to implement appropriate child safe recruitment practices. • Manage procedures for receiving and responding to complaints. • Work with directorates, as required, to establish an induction and training regime on child safe requirements
Executive Team	• Demonstrate commitment and leadership in promoting a child safe workplace. • Ensure child and vulnerable people safety is considered and included in the development of risk assessments for any work involving children, young people or vulnerable people. • Ensure relevant policies and procurement or grant review papers reference compliance with the <i>National Child Safe Framework</i> and relevant legislation.

	- Consider child and vulnerable people safety when assessing grants and procurements which may involve children or vulnerable people in their delivery. - Ensure third party providers have appropriate child safe policies and comply with their child safety and vulnerable people obligations. - Take immediate action where breaches of this policy by staff, service providers or grant recipients are alleged.
Quality Subcommittee	- Undertake regular review of this policy. - Support areas who undertake work involving children to appropriately manage risks. - Promote compliance with recordkeeping obligations to support this policy.
Quality & Risk Committee (QRC)	- Review the policy biennially and recommend to the Board for approval. - Report to the Board on the effectiveness of the Policy.
Board	- Review the Policy biennially or as circumstances require, considering any recommendations from the QRC. - Receive advice from the QRC on the effectiveness of this Policy.
Implementation	- An eLearning module has been developed to support education of this policy. It will be uploaded to the LMS. Staff will be provided with a completion date. - The policy or protocol is to be implemented in accordance with the implementation plan developed for policy sign off. - The Quality Manager will send an email to staff to inform them of the new policy. - The Quality Manager will upload a final PDF copy of the procedure to the Reference library at the same time as the outgoing email to staff. - The People and Culture Manager is to assist with & monitor its implementation, provide support to employees and assistance to managers (see Responsibilities).

6. Related documents

- MHFAI Code of Conduct
- Employment Checks Protocol
- Safeguarding Policy

7. References and legislation

- National Child Safe Framework
- National Principles for Child Safe Organisations.
- Commonwealth Child Safe Framework policy document

8. Document control

This document is maintained in electronic form and is uncontrolled in printed form. It is the responsibility of the user to verify that this copy is the latest version.

Version

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Revision History

<i>Version</i>	<i>Date of Issue</i>	<i>Approved</i>	<i>Summary of changes</i>
1.0	February 2025		New Policy
1.1	March 2025		Updates to responsibilities and grammar correction.
1.2	February 2026		Formatting. Present to Board for formal approval.
1.3	10 March 2026	10 March 2026	Extension of scope to include all 'workplace participants'. Addition of QRC to Responsibilities. Approved via circular resolution.