



Child Protection Policy and Procedures

Camp Cooby / Cooby Reflections

Updated January 2026

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1. INTRODUCTION

1.1 Policy Statement

Cooby Reflections Pty Ltd t/a Camp Cooby (uses the brands of Camp Cooby and Cooby Reflections) is committed to providing a safe and secure environment for all staff and Camp Participants; particularly children. The Camp Cooby Child Protection Policy & Procedures aims to reduce the risk of abuse occurring, and to ensure that a caring and appropriate response is taken should abuse occur.

1.2 Scope

The Camp Cooby Policy & Procedures apply to:

- All activities authorised by or under the control of Camp Cooby, including those activities undertaken at Camp Cooby's premises or away from Camp Cooby's premises.
- All Camp Cooby staff or other persons engaged by Camp Cooby.
- All community groups and family who access our site

1.3 Authority

These are the Child Protection Policy & Procedures of Camp Cooby. This latest version was adopted for use by the Camp Cooby Management Team on the 20th of January 2026. The Management Team include the Directors, HR/Finance Manager, and General Manager. The Management Team is committed to:

- implementing the Child Protection Policy & Procedures, and
- training Camp Cooby staff and others engaged by Camp Cooby in its content and application.

1.4 Definitions

Camp Cooby: Cooby Reflections Pty Ltd trading as Camp Cooby and Cooby Reflections

Child: Any person under the age of 18.

Staff: includes all paid employees, volunteers, contractors, and any person engaged to work with children on behalf of Camp Cooby

Camp Participant: Any person attending Camp Cooby activities.

Abuse can consist of one or more of, but is not restricted to, the following:

Physical Abuse – Physical abuse happens when a child has been hurt or injured, and it is not an accident. Physical abuse does not always leave visible marks or injuries.

Sexual Abuse – Child sexual abuse happens when an adult, teenager or child uses their power or authority to involve another child in sexual activity. It does not necessarily involve genital contact but is any act which erodes the sexual boundary between two persons. It may appear consensual but the validity of consent is negated by the power differential.

Emotional Abuse – Emotional abuse happens when a child is treated in a way that negatively impacts their social, emotional or intellectual development.

Neglect - Neglect happens when a child's basic needs are not met, affecting their health and development.

Below is not a comprehensive list, but guidance about the types of abuse by a perpetrator and the types of harm and impact of harm on a child.

TYPES OF ABUSE <i>Actions/behaviours by perpetrator</i>	RESULTING HARM <i>Impact experienced by the child</i>
Physical abuse • Hitting • Shaking • Burning/scalding • Biting • Causing bruise or fractures by excessive discipline • Poisoning • Giving children alcohol, illegal drugs or inappropriate medication • Domestic and family violence	Physical <i>Refers to the body</i> • Bruising • Fractures • Internal injuries • Burns
Psychological or Emotional abuse • Scapegoating • Persistent rejection or hostility • Constant yelling, insults or criticism • Cultural affronts • Teasing/bullying/cyberbullying • Domestic and family violence	Psychological <i>Refers to the mind and cognitive processes</i> • Learning and developmental delays • Impaired self-image
Neglect • Not giving a child sufficient food, housing, clothing, enough sleep, hygienic living conditions, health care and adequate supervision • Leaving children unattended • Children missing school	Emotional <i>Refers to the ability to express emotions</i> • Depression • Hypervigilance • Poor self esteem • Self harm • Fear/anxiety
Sexual abuse or exploitation • Kissing or holding a child in a sexual manner • Exposing a sexual body part to a child • Exposing children to sexual acts or pornography • Making obscene phone calls or remarks to a child • Having sexual relations with a child or young person under 16 years of age	

2. ORGANISATION

Cooby Reflections / Camp Cooby is located at 239 Loveday Road, Geham Q 4352.

2.1 Staff Definition: Any person (paid or unpaid) who is responsible for the care and/or control and safety of Camp Participants placed in their care whilst holding a formal position in Camp Cooby.

Staff include but are not limited to:

- Permanent Employees (both Part-time & Fulltime)
- Casual employees
- Interns
- Volunteers / Students on placement
- Contract Outdoor Facilitators from other organisations eg. Coefficient.

Group Staff - Any person who is part of the Camp Participant group but is also responsible for the care and/or control and safety of the participants.

Group Staff include but are not limited to:

- Youth Leaders
- Teachers
- Volunteers
- Parents
- Sports Coaches and Organisers/Helpers
- Any person under the age of 18 who is invited by a Camp Cooby staff member or a Group Staff member to assist them in their duties.

Camper - Any person, including children, who attends or participates in Camp Cooby's activities.

3. CODE OF CONDUCT

Linking with this policy is the Camp Cooby staff Code of Conduct. All staff are to adhere to and follow our staff Code of Conduct.

4. POLICY REVIEW

The Policy & Procedures will be formally reviewed annually by the Camp Cooby Management Team who will inform all staff of any changes. Staff can submit suggestions for changes at any time. The Policy is reviewed annually at the beginning of each year. The next review will be January 2027.

5. OBLIGATIONS

Camp Cooby require all staff to treat all people with respect, fairness, dignity and to care for those who are less powerful and in need of nurture and protection. We support open communication between staff, participants, groups and parents in regards to this policy.

5.1 Legal

Camp Cooby and its staff are subject to Federal and State Child Protection legislation and principles established through common law. Including:

- Child Safe Organisations Act 2024 (effective 1 October 2025)
<https://www.legislation.qld.gov.au/view/pdf/asmade/act-2024-049>

The Act establishes an integrated child safe organisation system in Queensland including:

- mandatory [child safe standards](#) for businesses or organisations working with or providing spaces and facilities for youths
- a nationally consistent [reportable conduct scheme](#).
- Queensland Child Protection Act 1999
<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010>
- National Child Protection Principles

<https://www.childsafety.gov.au/resources/national-principles-child-safe-organisations>

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

5.2 Ethical

Some actions may not be legally regarded as abuse but are considered unacceptable behaviour for Camp F staff.

These unacceptable behaviours include:

- Inappropriate conversation of a sexual nature.
- Coarse language, especially that of a sexual nature.
- Suggestive gestures or remarks.
- Jokes of a sexual nature.
- Inappropriate, but accidental touching (occurs when you have carried out an action that is against best practice, even if permission is granted [e.g. adjusting a harness where it passes between the legs, leading to you accidentally touching their genitalia], OR where you have engaged in an accepted practice but have not asked permission beforehand and then accidentally touch the person [eg, you adjust the harness at the hips without asking permission first, and then accidentally touch them on the hip]).
- Inappropriate literature (e.g. PG, M, MA, R or X rated material used with young Children).
- Acts of violence committed by a leader in the course of an activity.

The age of individuals is recognised as one of the determinants in deciding what behaviour is acceptable or unacceptable. Regardless of ages, all Camp Cooby staff are to ensure that high standards of conduct are always maintained.

6. SELECTION & SCREENING

6.1 Staff

Staff involved in children's activities must be carefully selected and screened. Staff are also required to undergo ongoing and mandatory child protection training. Prior to staff commencing, organising, running and/or supporting child-related activities, the following precautions will be taken:

Potential permanent employees, interns, casual employees and volunteers:

- Will complete an application form/submit a CV, which requests details of referees and permission to contact them.
- Referees will be checked and spoken to, using an agreed set of questions. The questions will seek to establish the applicant's suitability for the role or position with the responses documented and retained on file.
- Will be interviewed by the Camp Cooby Leadership Team prior to being accepted.
- If found acceptable, all casual and permanent staff will be offered the position on probation (usually six months). Volunteers will offer their services as agreed.
- All staff must hold a current Queensland Blue Card before commencing work with children. Applicants who do not already hold a valid Blue Card must apply immediately upon receiving an offer of employment and cannot commence child-related duties until the Blue Card is issued.
- Permanent employment will only be offered subject to a satisfactory Working with Children Check and provision of a current Blue Card. Where Camp Cooby has identified that an applicant has previously committed a violent or sexually related offence, they cannot, under any circumstances, be considered for child related activities.
- Contract Staff from other organisations are to hold a current QLD Blue Card and be familiar with, and comply with, the Camp Cooby Child Protection Policy and Procedures.

6.2 Helpers

Helpers are to be familiar with, and comply with, the Camp Cooby Child Protection Policy & Procedures. Any Helper who provides assistance with an activity or duty that involves children must be supervised by Camp Cooby Staff or Group Staff at all times and will be accountable to that Leader. Staff who ask for or accept the assistance of a Helper must be satisfied with the Helper's maturity and their suitability to work with Children.

7. TRAINING

All Camp Cooby Staff will be issued with a copy of this policy and receive training in:

- The content and application of Camp Cooby's Child Protection Policy & Procedures
- Reporting procedures and the associated legal requirements.

The Camp Cooby Leadership Team is responsible for employing new staff and will monitor developments on Child Protection issues and undertake further education as required. There is also a requirement for staff to attend regular annual mandatory training.

8. A SAFE ENVIRONMENT

Incidents of Abuse are unlikely to take place in front of another person and the presence of a witness can assist in clarifying questionable allegations. For these reasons, two responsible adults will always be present when working with or supervising Children. These can be either Camp Cooby staff or Group Staff or a combination of both.

When transporting Children, Camp Cooby staff must never be alone with a child in a vehicle. There must always be at minimum two responsible adults present in the vehicle with the dependent child. Ideally there would be a second child also to avoid any perception of imbalance of power.

Staff will respect a Camp Participant's feelings and privacy when engaging in physical contact of any kind. Adults and children are expected to respect each other's privacy during activities that require undressing, dressing or changing clothes. Staff are to set an example by protecting their own privacy in similar situations. No Camp Cooby staff member is to be alone in a room with a single child at any time, including while either is changing.

All personal instruction is to be carried out within sight of another Camp Cooby or Group staff member. Initiations and secret ceremonies are prohibited. All aspects of every child-related program will be open to observation by parents/guardians.

Staff have the right to ask people, who do not have a valid reason to be present at Child-related activities, to leave. Police may be contacted if such persons refuse to comply with any reasonable request to leave.

Just as we report any site concerns regarding safety please also report any child protection site concerns to the Management Team or via uploads.

9. DISCIPLINING CHILDREN

Camp Cooby staff do not 'discipline' or 'punish' children. Children are encouraged to abide by the rules and modify their actions to achieve group goals as identified by Camp Participants, Group Staff and Camp Cooby staff. Consequences are used to encourage improved behaviour. These consequences will not offend, belittle, tease, abuse, insult, humiliate, threaten, alienate or intimidate children. The approach Camp Cooby will use with a group of children depends on numerous factors and is discussed with Group staff before activities commence.

Camp Cooby Staff may choose to exclude a child from an activity if they may harm themselves or other children or are an obstruction to Camp Cooby's duty of care responsibilities to other children. If the behaviour continues, Camp Cooby may ask Group Staff to remove any child from the site for the remainder of the program or for an agreed duration.

We recommend a *Positive Discipline Approach*

At Camp Cooby, we recognise the importance of creating a positive and nurturing environment for all camp participants. Our approach to discipline is rooted in the principles of positive reinforcement, encouragement, and respect for each child's individuality. We believe that positive discipline not only fosters a supportive atmosphere but also encourages personal growth and development.

1. Positive Reinforcement:

Staff members are encouraged to use positive reinforcement as a primary means of acknowledging and reinforcing desirable behaviours. This may include verbal praise, recognition, and small rewards to motivate children towards positive actions.

2. Encouragement:

We place a strong emphasis on encouragement to boost the confidence and self-esteem of camp participants. Encouragement involves recognising efforts, acknowledging achievements, and providing constructive feedback to help children learn and grow.

3. Setting Clear Expectations:

Clear expectations for behavior are communicated to all camp participants at the beginning of each activity or program. By outlining expectations, children understand the standards and values upheld at Camp Cooby.

4. Consequences Focused on Growth:

In situations where redirection or correction is necessary, staff members will utilise consequences that are focused on fostering growth and learning rather than punishment. This approach helps children understand the impact of their actions and encourages them to make positive choices.

5. Communication with Parents/Guardians:

In cases where behavioural concerns arise, open and transparent communication will be maintained with parents/guardians. This collaboration ensures that parents are informed about their child's experiences and can provide valuable insights into effective strategies for positive behaviour reinforcement.

By adopting a positive discipline approach, Camp Cooby aims to create a supportive atmosphere where children feel valued, respected, and motivated to actively participate in camp activities. Our commitment to positive reinforcement contributes to the overall success of our programs and the well-being of every participant.

10. REPORTING PROCEDURES

If you have concerns about the immediate safety of a Child / children please contact 000. It's important that you report all concerns about a child's safety to the Camp Cooby Leadership Team.

If necessary, an independent person will be tasked with the specific duty of dealing with any allegations that arise.

Although you may not be a mandatory reporter according to the Child Protection Act, **all concerns about a child's safety are to be treated as a mandatory report to the Camp Cooby Leadership Team.** Child protection is everybody's business and responsibility. If there are reasonable grounds to suspect a Child has been or is suffering from abuse at Camp Cooby, Camp Staff are to immediately identify the potential issue with the General Manager / Senior Outdoor Education Facilitator (or Leadership Team onsite), and should immediately contact the Camp Cooby Directors and General Manager.

Immediate Response Protocol

1. If a child is in immediate danger, call **000**
2. Ensure the child's immediate safety without contaminating evidence
3. Notify the General Manager verbally as soon as practicable
4. Complete a written incident report within 24 hours
5. Do not contact the alleged perpetrator
6. Do not investigate: this is the role of authorities

The General Manager will then:

- Notify Camp Cooby Directors within 2 hours
- Contact Police (07) 4631 6333 if criminal conduct is suspected
- Contact Child Safety Services (1800 177 135) if the child may be at risk at home. Child Safety Services on 1800 177 135 or (07) 3235 9999. This is a 24/7 service. Email: enquiries-info@childsafty.qld.gov.au
- Notify QFCC within 3 business days if reportable conduct is involved
- Contact Camp Cooby's insurer

Reasonable grounds can be assumed when:

- A Child discloses that he or she has been abused, and/or
- Someone close to a Child (e.g. close friend) discloses on behalf of that Child.

Where an abuse allegation is made against a Camp Cooby staff member, he/she will be removed from all Children related activities pending the outcome of investigations.

A child may disclose an incident of abuse to a Camp Cooby Staff member. If the alleged incident is to have occurred somewhere other than at a Camp Cooby activity (e.g. home or school), that incident is to be reported to the General Manager verbally and in writing. The General Manager will refer the information to the Group staff who should refer it to the Police or relevant authorities as per their internal procedures.

If a disclosure of abuse is made, the person who receives the disclosure is to maintain appropriate care to the one making the disclosure. This will include:

- Treating each allegation seriously and not attempting to deny the allegation or minimise its impact on the alleged victim. The matter should not be swept under the carpet.
- Not pushing the Child to disclose details of the alleged assault or attempting to investigate the allegation.
- Assuring the Child that they are understood: that their disclosure is being taken seriously; that what has happened is not their fault, and that they are correct in disclosing the incident.
- Reporting the abuse immediately to your supervisor who will report the abuse to the police and Camp Cooby's insurer.
- Not contacting the alleged perpetrator. If he/she is a member of Camp Cooby staff, at some stage the General Manager may refer them to an appropriate organisation for counselling and/or advice.
- If the alleged assault has taken place recently, clothing worn by the Child is to be retained and handed to the police for forensic examination.
- Maintaining confidentiality. Any disclosures by a Child and all details of the subsequent investigation are to be documented promptly and the documents held in a secure location where a breach of privacy cannot occur. It is crucial to strike a balance between maintaining confidentiality during investigations and ensuring transparency in our commitment to child protection. All individuals involved in the reporting and investigation process are expected to adhere to the following guidelines:

1. Confidentiality:

Information related to child protection concerns, investigations, and outcomes must be treated with the utmost confidentiality.

Only individuals directly involved in the investigation, including the Camp Cooby Leadership Team, the designated independent person (if appointed), and relevant authorities, will have access to the details of the case.

2. Transparency:

While maintaining confidentiality, Camp Cooby is committed to being transparent with stakeholders to the extent permitted by law and the best interests of the child.

Regular updates on the progress of the investigation, without compromising confidentiality, will be provided to the Camp Cooby Leadership Team.

3. Restricted Access:

Access to any documentation related to child protection concerns and investigations is restricted to authorised personnel only.

- The release of information to external parties, including parents and guardians, will be done in accordance with legal requirements and the protection of all involved parties.

4. Staff Responsibilities:

- All staff members involved in the reporting process are required to maintain confidentiality and refrain from discussing details of the case with anyone not directly involved in the investigation.

- Any breach of confidentiality may result in disciplinary action.

5. Transparency in Outcomes:

- Once an investigation is concluded, the Camp Cooby Leadership Team will provide a summary of the outcomes to the extent allowed by law and without compromising the privacy and safety of the individuals involved.

6. Anonymous Reporting:

- Individuals who wish to report concerns anonymously can do so to the Director or do so via Child Safety directly if it involves one of the Directors.

By adhering to these principles, we aim to foster an environment of trust, ensuring that child protection is prioritised while respecting the rights and privacy of all parties involved.

11. MANDATORY REPORTING

The Child Protection Act 1999 requires certain professionals, referred to as 'mandatory reporters', to make a report to Child Safety, if they form a reasonable suspicion that a child has suffered, is suffering or is at an unacceptable risk of suffering significant harm caused by physical or sexual abuse, and may not have a parent able and willing to protect them.

Mandatory reporters should also report to Child Safety a reasonable suspicion that a child needs protection caused by any other form of abuse or neglect.

Under the Child Protection Act 1999, mandatory reporters are:

- teachers
- doctors
- registered nurses
- police officers with child protection responsibilities
- a person performing a child advocate function under the Public Guardian Act 2014
- early childhood education and care professionals.

In addition to the mandatory reporting requirements for certain professionals under the *Child Protection Act 1999*, it is an offence under the [Criminal Code Act 1899](#) section 229BC (1)(a) for any adult not to report sexual offending against a child by another adult to police. This means all adults have the responsibility to report sexual offences against children to police—unless they have a “reasonable excuse” not to.

For this law, a child means a person under 16 or a person under 18 with an “[impairment of the mind](#)”. A child sexual offence is broadly defined and may include conduct such as fondling a child in a sexual manner, having the child touch a sexual body part, taking a sexual photograph of a child, or grooming a child or their parent or carer. “Reasonable excuse” includes if you have already reported your concerns to Child Safety, or you know another adult has or will report it.

For more detail about this offence see [Failing to report sexual offences against children | Your rights, crime and the law | Queensland Government \(www.qld.gov.au\)](#)

Queensland's Reportable Conduct Scheme (commencing 1 July 2026)

Queensland's Child Safe Organisations Act 2024 introduced a system to protect children from harm in organisational settings. The system comprises Child Safe Standards (effective 1 January 2026) which aim to create environments that prioritise the safety and wellbeing of children, and a Reportable Conduct Scheme (effective 1 July 2026) which enables an appropriate response if harm or misconduct occurs. These two parts work together to effectively safeguard children's safety.

The Reportable Conduct Scheme requires organisations to report and investigate allegations or convictions of child abuse or child-related misconduct (reportable conduct) made about their workers and volunteers. The Royal Commission into Institutional Responses to Child Sexual Abuse recommended every state and territory introduce a Reportable Conduct Scheme. This was intended to improve the way organisations across Australia manage risks and allegations of harm and to ensure consistent and transparent responses across sectors.

What is reportable conduct?

Reportable conduct includes:

- a child sexual offence
- sexual misconduct committed in relation to, or in the presence of, a child
- ill-treatment of a child
- significant neglect of a child
- physical violence committed in relation to, or in the presence of, a child
- behaviour that causes significant emotional or psychological harm to a child.

Reportable conduct may be one act or a series of acts or incidents. It does not need to have occurred in the course of the worker's employment, for example, it may occur while the worker is off duty or out of hours. The Reportable Conduct Scheme applies even when the conduct does not result in criminal charges.

What are organisations required to do?

Camp Cooby has systems in place:

- to prevent reportable conduct by workers in the workplace, enacted through the Child Safe Standards
- that enable anyone to report concerns of reportable conduct to the head of the organisation and to Queensland Family & Child Commission
- to investigate reportable conduct.

If Camp Cooby receives a report about reportable conduct, the Director is required to:

- notify Queensland Family & Child Commission (QFCC) of the report within three business days
- provide QFCC with an interim report within 30 business days
- provide QFCC with a final report including the investigation findings as soon as practicable.

The Reportable Conduct Scheme does not change the existing reporting requirement of Camp Cooby to report to other regulators, police or another body.

To be very clear, Camp Cooby is legally responsible to report conduct upon receiving a report of reportable conduct:

1. **Within 3 business days:** Notify Queensland Family & Child Commission (QFCC)
2. **Within 30 business days:** Submit interim report to QFCC
3. **As soon as practicable:** Submit final investigation report to QFCC

12. REGISTRATION

Under the *Working with Children (Risk Management and Screening) Act 2000*, Camp Cooby is required to be registered with Blue Card Services to enable screening checks to be undertaken on its behalf. Camp Cooby currently holds such a registration. Camp Cooby maintains a register of all paid and volunteer staff. This register includes their Blue Card details – number and expiry date. The HR/Finance Manager will review registrations annually (or upon expiry dates). Please also contact the HR/Finance Manager if there has been any change to your Blue Card, Working with Children, status. You should report this immediately to the HR/Finance Manager and discontinue working with children on our site.

13. ALCOHOL & DRUGS

The consumption of alcohol or illegal drugs by children under the age of 18 on Camp Cooby grounds or during an activity is not permitted. Any Child found to be under the influence of alcohol or illegal drugs is to be safely removed from activities and the parents/guardians contacted so the Child can be returned home immediately.

Children required to take prescription medication will do so under the supervision of Group Staff (or Camp Cooby staff). Camp Cooby staff should not normally be involved except during a Holiday Camp where Camp Cooby staff are also considered Group Staff.

Staff Conduct Regarding Alcohol and Drugs

Camp Cooby places the safety and well-being of all participants as its highest priority. Staff members are expected to adhere to the following guidelines concerning alcohol and drugs during camp activities, when working with children:

1. Alcohol and Illegal Drugs Prohibition:

The consumption of alcohol or illegal drugs by staff members while on Camp Cooby grounds or during camp activities is strictly prohibited.

2. Consequences for Staff found Under the Influence:

Any staff member found to be under the influence of alcohol or illegal drugs during camp activities will face immediate consequences, including but not limited to:

- Removal from the ongoing activity or responsibility.
- A formal review of the incident by the Camp Cooby Leadership Team.
- Disciplinary actions, which may include reprimand, suspension, or termination of employment, depending on the severity of the violation.

3. Safety Measures:

Staff members involved in transporting children must never be alone with a child in a vehicle. There must always be a minimum of three people in the vehicle with the dependent child, ideally with a second child present to avoid any perception of an imbalance of power.

4. Reporting Procedures:

Any staff member who becomes aware of another staff member being under the influence during camp activities is obligated to report the incident immediately to the Camp Cooby Leadership Team.

5. Education and Awareness:

Staff members are encouraged to stay informed about the potential risks associated with alcohol and drug use, especially in the context of their responsibilities towards the safety and well-being of camp participants.

Camp Cooby is committed to maintaining a safe and secure environment for all participants. By adhering to these guidelines, staff contribute to creating an atmosphere that prioritises the welfare of children and ensures the success of our camp programs.