
Blue Lake Sports Club Inc.

Child Safe Policy



JUNE 25, 2021

VERSION 1.3

Review Date: JANUARY 2022

Purpose

This policy reflects Blue Lake Sports Club Incorporated's recognition of the role it plays in providing a safe environment for the children, young people and their families who access the club, participate in its activities and receive its services. The club acknowledges that where there are children and young people, there is risk of them being harmed. The club has undertaken the task of appointing a Child Safety Officer and creating a Child Safe Policy. Both actions endeavour to keep children and young people safe within the club, to protect children and young people from harm, to promote a culture of respect for children and young people and to align the club with the South Australian child protection legislative requirements.

Commitment to the Safety of Children and Young People

The Blue Lake Sports Club Inc. acknowledges that children and young people have the right to be safe, to be protected from harm, reach their full potential, feel valued, respected and to be heard. The club is proudly committed to upholding these rights by being a child safe and child friendly environment where the safety of children and young people is priority. The club has stipulated, within its policies, procedures and codes of conduct, the expectations and obligations of those involved in the club (across administration, operation, governance and performance positions) in paid or voluntary capacities to ensure the safety and well-being of children and young people. The club will not tolerate harm and/or risk of harm against children. Any such incidents will be reported to the Child Abuse Report Line (CARL) on 13 14 78 and necessary action will be taken to protect the children and young people involved the club.

The club will review its Child Safe Policy regularly to ensure continuous improvement of child safe practices and adherence to legislative requirements. The policy is accessible to children, young people and their families in varying formats, including culturally appropriate formats for Aboriginal and Culturally and Linguistically Diverse (CALD) families. The club has also received STARCLUB certification with the South Australian Office of Recreation, Sport and Racing (ORSR).

Scope

This policy applies to all persons within the club, paid or voluntary, that work with (or will *likely* work with) children and young people and or have access to their records. The scope of this policy therefore includes the president, sports director, child safety officer, committee members, coaches, team managers and extends to players, parents/caregivers, trainers and any other individual/s identified from time to time by the club.

Legislative requirements and Child Safe Principles

This policy identifies and outlines the legislative obligations in accordance with the **Children and Young People (Safety) Act 2017** (Chapter 5 *Reporting of suspicion that a child or young person may be at risk* and Chapter 8 *Providing safe environments for children and young people*) and the **Child Safety (Prohibited Persons) Act 2016**. This policy describes the policies, procedures and practices undertaken by the club to meet and maintain the legislative requirements, which includes but is not limited to: background screenings for all relevant persons, reporting incidents of harm and or risk of harm against children and maintaining a physically, emotionally and culturally safe environment for children and young people. The club has ensured that the policy is in accordance with the **Department of Human Services (DHS) Child Safe Environments Principles of Good Practice** and the **Australian Human Rights Commission Child Safe Organisation National Principles for Child Safe Organisations**.

The club has legitimised its Child Safe Policy and authenticated being a child safe organisation by receiving a Child Safe Environment Compliance Statement from the Department of Human Services.

Children and Young People's Participation

The club encourages and respects the views of children and young people who access the club, participate in its activities and receive its services. The club will listen to and respond to any concerns that children, young people (and their families) have about their rights in regards to safety, protection and well-being. The club will provide children, young people and families with avenues to raise any concerns they have in a confidential and child-friendly/age-appropriate manner (*refer to 1.06 Complaints and Misconduct*). The club encourages children and young people to actively participate in matters regarding their safety, protection and well-being. The club promotes and encourages children and young people to understand and have knowledge about their safety and rights.

In order to authenticate children's participation in the development of this policy, the child safety officer met with the club's Mini-roos, under 12 and under 14 division teams (in the presence of their families and coaches) to explore what it meant for them to feel safe. The Mini-roos statements about safety included: "*not being scared, being cared for, feeling safe*". The Under 12 and 14 division's statements about safety included: "*to be supervised by adults, to play fair, to be careful of suspicious people*".

The under 17s division players were consulted by a representative coach about what safety meant for them and what the club can do to provide a safe environment. The collective response from the under 17s division was that safety means "*protecting children from abuse or bullying*" and "*being cautious about the surrounding in our club environment*".

The club's legitimacy in being child safe and fostering a culture of respect allows children and young people to have a voice and influence within the club and acts as a deterrent to those that would seek to harm them. The club will ensure that where possible and appropriate, the voice, influence and contribution of children and young people is included in decisions pertaining to their safety.

Child Safety Officer

The Blue Lake Sports Club Inc. has appointed a child safety officer. The purpose of the child safety officer is to provide education, information and training about child safety and support the implementation of the club's Child Safe Policy. The child safety officer is responsible for maintain the club's compliance to legislative requirements and monitoring the club's Child Safe Policy, procedures and practices.

For matters regarding the suspicion of harm and or risk of harm against a child or young person, a notification will be made by a notifier to the Child Abuse Report Line (CARL) on 13 14 78. Where required, the child safety officer will provide support and advice to the notifier. Notifiers must inform the child safety officer and the president (or their delegate) of any concerns they have and/or notifications they have reported to CARL to ensure that adequate support can be provided to the child, young person and their family and to monitor their circumstances. The child safety officer is not responsible for investigating and/or substantiating suspicion of harm and/or risk of harm against a child or young person. All concerns and notifications about children and young people will be managed in a confidential manner in accordance with the information sharing guidelines.

Risk Management Strategy

As part of the club's commitment to maintaining a child safe environment, the club undertakes a continuous risk management strategy whereby the identification, assessment, mitigation, monitoring and review of risks that could harm children and young people is conducted. The club's policies, procedures, codes of conduct and guidelines support the risk management strategy (*refer to Appendices A: Policies, procedures and practice, Appendices B: Supporting documents and Appendices C: Forms and Agreements*). Additionally, the Child Safe Policy is reviewed every 12 months (or as required) to support the management of new and/or emerging risks and child safety is featured as a standing item on the committee agenda. The club president, sports director, child safety officer and committee members are responsible for reviewing the Child Safe Policy.

Responsibilities

The club considers all people involved in the club to have varying degrees of responsibility for the safety of children and young people. Official positions, including the club president, sports director, child safety officer, committee members, coaches and team managers hold a primary role of implementing the Child Safe Policy and maintaining safety for children and young people, however the wider club community also maintains certain aspects of responsibility as stipulated in the codes of conduct and subsequent policies.

Codes of Conduct

The club refers to the *Play by the Rules Codes of Behaviour*, *Play by the Rules Guidelines for Interacting with Children*, *Football South Australia's Respect Program* and *Football South Australia Codes of Behaviour* as the codes of conduct for all club people to adhere to (refer to *Appendices B: Supporting Documents*). The codes, guidelines and Respect program stipulate behavioural expectations, professional boundaries, individual responsibilities, acceptable and unacceptable behaviour. By adhering to the codes of behavioural conduct, the club demonstrates its commitment to providing a physically, emotionally, socially and culturally safe environment for children and young people and promotes the club's culture of being a child-friendly and respectful sporting organisation where children, young people and families feel comfortable and positive sporting behaviour is promoted.

Child Safe Specific Policies and Procedures

There are aspects of the club's administration, operation, governance and performance that require specific policies and procedures which further supports the club's commitment to providing a safe environment for children and young people.

1. **1.01 Working with Children Checks:** Under South Australian law, certain organisations must ensure that people working and/or volunteering with children be subjected to a Department for Human Services (DHS) Working with Children Check (WWCC) or have a current Department of Communities and Social Inclusion (DCSI) Child Related Employment Screening (CRES) clearance. The club's child related clearance policy and procedure satisfies legislative requirements under the Child Safety (Prohibited Persons) Act 2016
2. **1.02 Recruitment and background screening:** The club recruits and appoints suitable and safe people to undertake official positions in the administration, operation, governance and performance of the club
3. **1.03 Supervision, support and training:** The club provides supervision, support and training to people in official roles (including coaches, team managers, trainers) to ensure appropriate and child safe sporting practices

4. **1.04 Reporting and responding to the suspicion that a child is or may be at risk of harm:** Club people in official positions are mandated notifiers and understand their legal obligation to notify the Child Abuse Report Line on 13 14 78 where there is suspicion that a child is or may be at risk of harm
5. **1.05 Bullying, harassment and discrimination:** The club does not tolerate bullying, harassment and discrimination. Information about appropriate behaviour is captured in the codes of conduct
6. **1.06 Complaints and misconduct:** Information provided or ascertained by the club is treated confidentially. Children and young people can raise complaints in a child-friendly manner and incidents of misconduct will not be tolerated
7. **1.07 Consent to social media/photography:** The club is aware of the dangers of online grooming and parents/caregivers are required to provide consent for their child to be featured on the club's social media platforms
8. **1.08 Drop-off and collection of children and young people:** The club requires parents and caregivers to drop off and collect their children and young people safely and appropriately
9. **1.09 Chaperone (travel and accommodation):** The club recognises the importance of keeping children and young people safe where travel and accommodation is involved and requires parent/caregiver consent. Those providing chaperone need to be aware of their obligations and duty of care whilst chaperoning and acting as a representative of the club
10. **1.10 Communication:** Timely, respectful, appropriate and accurate communication contributes to the safety of children and young people
11. **1.11 Change rooms:** The club recognises that change rooms are spaces where children and young people need to be aware of the need to protect their own physical safety and well-being. The club has placed age-appropriate information in change rooms so children know about their own personal safety
12. **1.12 Heat and inclement weather:** When inclement weather occurs, the safety of all is considered and the club refers to the Football South Australia extreme weather policy (August 2020)
13. **1.13 Team selection junior grades:** The club ensures that the selection of children and their participation is fair, based on equality and demonstrates respect for all players

Child Safe Policy Definitions

Mandated notifier	A person with legal obligation under South Australian legislation to respond to and report suspected harm or risk of harm against a child or young person
Harm	Psychological and physical harm caused by act or omission (includes neglect, physical, mental, emotional and sexual harm)
Risk	Where a child or young person has suffered harm or there is a likelihood that the child or young person will suffer harm.

Supporting legislation, documentation, references, resources

- Australian Human Rights Commission - Child Safe Organisation National Principles
- Child Safety (Prohibited Persons) Act 2016
- Children and Young People (Safety) Act 2017
- Department of Human Services South Australia - Child Safe Environments
- Department of Human Services - Child Safe Environments Principles of Good Practice
- Football South Australia
- Good Sports
- Limestone Coast Football Association
- Mandated Notification Reporting Guide
- Office of Recreation, Sport and Racing South Australia
- Play By The Rules
- Royal Commission into Institutionalised Child Sexual Abuse Vol. 14 Sport, recreation, arts, culture, community and hobby groups
- STARCLUB

Appendices A: Policies, procedures and practice

1. 1.01 Working with Children Checks
2. 1.02 Recruitment and background screening
3. 1.03 Supervision, support and training
4. 1.04 Reporting and responding to the suspicion that a child is or may be at risk of harm
5. 1.05 Bullying, harassment and discrimination
6. 1.06 Complaints and misconduct
7. 1.07 Consent to social media/photography
8. 1.08 Drop off and collection of children and young people
9. 1.09 Chaperone (travel and accommodation)
10. 1.10 Communication
11. 1.11 Change rooms
12. 1.12 Heat and inclement weather
13. 1.13 Team Selection – junior grades

Appendices B: Supporting documents

1. Play by the Rules Guidelines for Interacting with Children
2. Play by the Rules Codes of Behaviour
3. Football South Australia's Respect Program
4. Football South Australia Codes of Behaviour
5. Football South Australia Extreme Weather Policy 2020
6. Information Sharing Guidelines

Appendices C: Forms and Agreements

1. Blue Lake Sports Club Inc. Appointment/Recruitment of Position form
2. Blue Lake Sports Club Inc. Appointment of Chaperone Agreement
3. Blue Lake Sports Club Inc. Chaperone (travel and accommodation) Consent form
4. Blue Lake Sports Club Inc. Child Safe Policy Checklist for Parents/Caregivers
5. Blue Lake Sports Club Inc. Child Safe Policy Officials Agreement form
6. Blue Lake Sports Club Inc. Confidential Record of Suspected, Alleged, Disclosed Harm (or risk of harm) form
7. Blue Lake Sports Club Inc. Incident/Record of Complaint form

Authorisation

Name: Stuart Cooper
President

Date 28.02.2021.

Dani Atkinson
Name: Dani Atkinson
Child Safety Officer

Date 28.02.2021

Carlyn Moyes
Name: CAROLYN MOYES
Committee member

Date 28.02.2021.

Review date: _____

Appendices A: policies, procedures and practice

1. 1.01 Working with Children Checks

The club requires all persons over the age of 14 years in official positions, including the president, sports director, child safety officer, committee members, coaches, team managers and other positions deemed necessary (e.g. canteen volunteers, grounds keeper) to have either a DHS WWCC or a current DCSI CRES and have been assessed by the relevant screening unit as not prohibited/cleared to work and or volunteer with children. DHS WWCC's are valid for 5 years, DCSI CRES clearances are valid for 3 years as of clearance date and conducted prior to 1 July, 2019 (original DCSI CRES clearances must be provided to the child safety officer for sighting).

The DHS screening unit will assess the application of a WWCC against a person's criminal history and will include: child protection information, information from SAPOL and criminal history from other Australian police jurisdictions. The club will not maintain or commence positions for people that:

- do not have one of the above clearances
- receive a prohibited outcome from being subjected to a DHS WWCC or receive a change of status to prohibited for a current DHS WWCC

Should a person's DHS WWCC outcome be prohibited or the status of their current DHS WWCC change to prohibited the club will take immediate action to cease the person's involvement with the club to ensure the safety of children and young people. In such instances, the child safety officer together with the president (or their delegate) will advise the person that they will not be able to commence or maintain their position with the club. The person will be entitled to have a support person with them when informed. Such information will remain confidential and will be managed under the information sharing guidelines. There are NO exemptions based upon supervision of people who do not have or have not been subjected to a DHS WWCC (or do not have a current DCSI CRES).

Procedure:

1. The child safety officer is responsible for submitting DHS WWCC applications and keeping a register of all DHS WWCC and DCSI CRES clearances
2. To commence an application for a DHS WWCC, personal details, including full name, date of birth, email, contact number and the prospective role being undertaken will need to be provided to the child safety officer (who is also the DHS verifying officer on behalf of the club)
3. The child safety officer will submit an application on behalf of the applicant. It is expected that the applicant will complete their application within 24 hours of receiving it. Delays in completing the application will result in delays of the DHS screening unit being able to commence the WWCC assessment
4. Applicants and the child safety officer will be notified of the DHS WWCC application outcome

2. 1.02 Recruitment and background screening

The club recruits and appoints suitable and safe people to undertake official positions in the administration, operation, governance and performance of the club with experience - however experience is not always essential or possible. In particular, the club relies heavily on the generosity of the families involved in the sport to undertake such roles. Despite the club's reliance on the generosity of families, the club has a commitment to ensuring safety of children and young people.

In addition to 1.01 Working with Children Check, the club undertakes a background screening process whereby an interview and at least one referee check is conducted prior to the appointment to a prospective position. The purpose of a background screening supports the club's efforts to keep children and young people safe in accordance with the Child Safety (Prohibited Persons) Act 2016, part 2, section 3 c – e.

The information ascertained from an interview and at least one referee check is recorded on the *Appointment/Recruitment of Position form*. The purpose of the referee check is for the child safety officer and the committee to make an informed assessment about the person's previous engagement with children and young people, their suitability for the prospective position/s and to establish congruence between the interview and the referee check. The interview questions include exploring the person's motivation for the position, previous experience, current qualifications and support and training needs. The referee check explores the referee's level of direct contact and supervision with the prospective appointment, including any concerns the referee may have. The prospective person will be informed of the club's decision to appoint or not regardless of holding a not prohibited DHS WWCC/cleared DCSI CRES. The information obtained via the background screening will be managed and recorded confidentially under the information sharing guidelines.

Procedure:

1. The club will inform the child safety officer of a prospective recruitment/appointment to a position in the club
2. The child safety officer will ascertain the person's current child related screening clearance OR submit an application for a DHS WWCC
3. Upon receiving the outcome of the DHS WWCC (of not prohibited) the child safety officer will conduct an interview and referee check of that person within an appropriate timeframe
4. The child safety officer will advise the committee of the background screening responses
5. The committee will make a decision as to appoint or not and will advise the person of the club's decision
6. Should the club decide not to appoint a person due to background screening, this will be communicated to the person in writing

3. 1.03 Supervision, support and training

The club provides supervision, support and training to people in official roles (including president, sports director, committee members, coaches, team managers, trainers and other positions identified) to ensure appropriate and child safe sporting practices. This is separated into two specific areas of child safety and general sporting.

Child Safety:

The club's child safety officer will provide supervision, training and support specific to child safety to people in administration, operations, governance and performance positions (and other positions deemed necessary). Supervision, support and training includes but is not limited to ongoing advice, information, education and supporting the implementation of the Child Safe Policy. The child safety officer will provide DHS Safe Environments – Through Their Eyes training (Refer to Child safe policy 1.04) as well as refresher training every three years or as needed. Those in official positions may be required to undertake further training identified from time to time that supports the safety and well-being of children and young people. Such training courses may include: Play by the Rules Child Protection Online Course & Play by the Rules Harassment & Discrimination Online Course). The courses can be found at www.playbytherules.net.au/online-courses

General:

Children and young people are afforded opportunities to achieve and reach their full potential when the adults around them are equipped to manage the general stressors that come from coaching and pressure that results from leading a team. The club will therefore provide supervision, support and training to all coaches, team managers and other positions deemed necessary to ensure their ongoing development including completing the Skills Training Certificate (FSA). The course is required to be completed as soon as practicable. All coaches and team managers are supported and mentored within the club as a collective across all grades and new coaches will be supported via supervision with senior/experienced coaches.

Supervising and supporting coaches:

Coaches and team managers will work with each other and with parents/caregivers to ensure that at the beginning and end of training, matches and events that they are not left on their own with a child or young person. In such instances, more than one coach and or team manager will need to be available to support the remaining coach.

Coaches that are under the age of 18 years must not be left on their own to coach/supervise other children as a duty of care. The club, coaches and team managers will need to work together in such instances, including blending teams until such time that another coach arrives.

Procedure:

1. All coaches and team managers are required to undertake the relevant coaching courses (and may be required to undertake further training identified from time to time)
2. All coaches and team managers will be afforded opportunities to receive supervision, support and training as identified, including where the club identifies training or education gaps in their respective role
3. All coaches will need to have contact details of those appointed to the club's official positions so that assistance can be called upon when needed
4. All coaches and team managers maintain timely communication to ensure that support can be arranged should another coach be unable to attend training, matches, and club events

4. 1.04 Reporting and responding to the suspicion that a child or young person is or may be at risk of harm

The club recognises that child protection is a shared responsibility. As a prescribed organisation that provides a sporting and recreational service to children and young people (under the Children and Young People Safety Act 2017), the club has a legal obligation to notify the Child Abuse Report Line (CARL) 13 14 78 where there is suspicion, on reasonable grounds, that a child or young person has been or is at risk of harm. The club has appointed a child safety officer who provides education, information and training to the club people in official positions about harm and or risk of harm (including but not limited to: understanding what constitutes harm and risk of harm, how to respond to disclosures, how to notify CARL and how to support a child or young person who is at risk of harm).

- Club people in official positions are required to undertake the DHS Safe Environments – Through Their Eyes training as soon as practicable
- Club people in official positions are expected to undertake a refresher of the DHS Safe Environments training every three years (or as needed)
- The child safety officer will maintain a register of people who have completed the Safe Environments training and will issue certificates of attendance once the training has been completed

In addition to notifying CARL, notifiers must inform the child safety officer and the president (or their delegate) of any concerns they have and or notifications they have reported to CARL to ensure that adequate support can be provided to the child, young person and their family and to monitor their circumstances. The *Confidential Record of Suspected, Alleged, Disclosed Harm (or risk of harm)* form records all information pertaining to such incidents for record keeping purposes. All information pertaining to the safety or harm of a child or young person will be managed in a confidential manner based on the information sharing guidelines.

Procedure:

Should a person form a suspicion on reasonable grounds that a child or young person has been or is at risk of harm, they need to:

1. Make a notification to the Child Abuse Report Line on 13 14 78 (and if required, seek support and or guidance from the child safety officer to make the notification)
2. Inform the child safety officer and the president (or their delegate) to advise of the concern/notification
3. Complete the *Confidential Record of Suspected, Alleged, Disclosed Harm (or risk of harm) form* for record keeping
4. Provide support, where appropriate, to the child, young person and or family and monitor their circumstances

5. 1.05 Bullying, harassment and discrimination (Play by the Rules Policy)

The club prides itself on being an inclusive, respectful and fair club that treats all club people equally. The club does not tolerate bullying, harassment and discrimination, including on online platforms. The club's expectations and standards of acceptable and unacceptable behaviour are stipulated in the codes of behaviour and child safe policies.

The club accepts the following definitions:

Bullying is deliberately hurting a specific person either physically, verbally, psychologically or socially. It involves a power imbalance where one person has power or strength (e.g. physical, mental or social) over another. In a sports context, bullying can take many forms, for example:

- a parent telling their child that they are incompetent, hopeless, useless, etc.
- a coach alienating a player (adult or child)
- a player calling a referee names and using put-downs

Harassment is any unwelcome conduct, verbal or physical, that intimidates, offends or humiliates another person. In a sports context, harassment can take many forms, for example:

- a player making embarrassing or degrading jokes about another player, spectator or club official (child or adult)
- a coach pushing or shoving a player (adult or child)
- a parent intimidating a young coach or other members of a team

Discrimination occurs when someone, or a group of people, are treated less favourably than another person or group because of their race, sex, age, disability, intersex status, gender identity, sexual orientation or some other characteristic

specified under anti-discrimination or human rights legislation. In a sports context discrimination can take many forms, for example:

- several people ganging up on an individual team member because of their disability
- spectators verbally abusing players from the opposition because of their race
- a player calling a referee names and using put-downs related to their sexual orientation

Bullying, harassment and discrimination can be a 'one-off' incident, but also involve repeated actions or incidences and can be carried out by one person or several people who are either actively or passively involved.

The physical, emotional, psychological and social impacts that bullying, harassment and discrimination has on a person or a group of people cannot be underestimated. When children and young people experience such behaviour from others, they can find it difficult to enjoy the sport, stay engaged, reach their full potential and feel safe within the club. Children and young people can be impacted emotionally, including feelings of rejection, not belonging, low self-esteem, poor self-worth, lack of confidence, isolation, intimidation and shame.

The club takes all reasonable steps to provide an environment where children, young people and their families feel welcomed, included, respected, treated fairly and equally. The provision of such an environment aims to prevent bullying, harassment and discriminative behaviour. The club expects those in official positions to intervene when such behaviour is observed. Should the club become aware of or is notified of incidents of bullying, harassment and discrimination, the club will take action to address such behaviour.

Procedure:

1. All officials are to role model acceptable behaviour and conduct official duties in a non-discriminatory way
2. All officials will act quickly if inappropriate behaviour is observed by discussing the implications of how such behaviour impacts on the person who the behaviour is being perpetrated against as well as the consequences of the person who is engaging in such behaviour
3. Inform the perpetrator that if the behaviour continues it will be raised with the child safety officer, the president and the committee, with their involvement sought to resolve the issue
4. Behaviour will be monitored across all facets of the club, including administration, operation, governance and performance

Club officials, children, young people and their families have the right to raise concerns and make formal complaints about such behaviour. The club has a complaint process (refer to 1.06).

6. 1.06 Complaints and misconduct (*Play by the Rules Policy*)

The club is committed to ensuring that complaints and allegations of misconduct are treated seriously, acted upon in a timely manner and that decisions regarding the outcome of complaints and allegations of misconduct will be based on the information gathered (not personal views). Where necessary, disciplinary action will be taken, particularly where the safety and well-being of children and young people is concerned.

The club is particularly mindful of the sensitivities that need to be applied when dealing with complaints and allegations of misconduct raised by children and young people. In such instances, the club will ensure that the process is managed in a child friendly and appropriate way, specifically that children and young people will be listened to and encouraged to speak about matters regarding their rights to safety and well-being. The club will manage complaints and allegations of misconduct by keeping children, young people and their families informed, treating them in a fair and respectful manner, not victimising complainants, ensuring that their information is kept confidential and accurate records maintained.

The manner in which complaints and allegations of misconduct are managed will depend on the nature of what is raised.

Procedure:

Minor complaints will be managed via an informal process, which will generally occur internally and can include:

- Seeking further information about the person making the complaint to verify details and understand the circumstances
- Providing more information to the person complaining (e.g. to clarify club policies and procedures)
- Suggesting or supporting the person complaining to talk directly with the person being complained about; should this pertain to a child or young person, a parent/caregiver representative may be the appropriate person to talk directly with the person being complained about
- Meet with the person being complained about
- Hold an informal meeting with those involved in the complaint

Serious complaints will be managed via a formal process, which may require an externally managed process and can include:

- Mediation
- Formal committee hearing and decision
- Escalation to state/territory sporting organisation (e.g., if the complaint requires formal investigation)
- Referral to an external agency (e.g. anti-discrimination agency)

Complaints will be escalated to an external agency when the club's policies or constitution directs that this type of complaint be dealt with at the state or national level and or where:

- There is a possible conflict of interest (or close relationship) between the people on the committee and any of the parties to the complaint
- It is beyond the skills of the committee and specific expertise or experience may be required to manage the complaint
- The complaint has not been able to be resolved at the club level
- The issue is more serious than first thought

For a discrimination complaint to be lodged with the appropriate authority, such as an anti-discrimination agency or human rights commission, it has to meet the following criteria:

1. There has to be sufficient grounds for complaint. The grounds for discrimination include race, sex, age, impairment, marital status and sexuality
2. It needs to fit within the areas of membership, conditions, playing rights and/or employment
3. It needs to fall within the time limit for making the complaint

Generally, complaints must be lodged within 12 months from the time the discrimination or harassment occurred. Whilst complaints can be dealt with through the club's internal complaint processes, they can also be lodged with an anti-discrimination agency – this decision rests with the person complaining and they can do so at any stage of the complaints process.

The club recognises that each complaint is different and the action taken by the club will depend on the circumstances of the complaint, particularly what the person complaining wants to do. The club may commence with one course of action but move to another as more information about the complaint becomes available.

Complaints can be raised within the club by contacting the committee BLCSafety@outlook.com with **CONFIDENTIAL** in the subject line or by speaking to the president, the child safety officer or a committee member.

The club will be required to make decisions to protect children and young people as the priority where investigations of serious complaints and allegations of misconduct are under way. This may include moving the person that the complaint is about to another position or make arrangements to ensure the safety for a child or young person whilst the outcome of an investigation is finalised. The club will ensure that all parties involved in the complaint are kept informed and their confidentiality maintained.

Child Safety:

Exceptions will be applied where complaints and allegations of misconduct pertain to physical and sexual abuse, harm or risk of harm to a child or young person. Such

complaints and allegations will be reported to the Child Abuse Report Line 13 14 78 in the first instance. Complaints and allegations of this type will be escalated to the relevant statutory authority for investigation e.g., the Department for Child Protection and/or SAPOL.

Breaches of conduct:

Where breaches of conduct have been substantiated, the club will be required to take appropriate and reasonable disciplinary action to ensure the safety of children and young people and to protect any child or young person that has been harmed physically, psychologically, emotionally or sexually as a result of breach/es.

Disciplinary action will be based on the information and evidence obtained through an investigation process or via the directions of a statutory authority and or stipulated by the rules, laws and constitution of our club and sport. Disciplinary actions may include:

- Cancellation, termination or suspension or change of an official position
- Direction for the person to cease involvement, participation and engagement with the club
- Cancellation, termination or suspension of membership
- Required actions to address behaviours such as counselling
- Written and or verbal apologies to those victimised and or harmed by the misconduct
- A fine sanctioned by the relevant authority
- withdrawal of any awards, placings, records, achievements bestowed in any tournaments, activities or events held or sanctioned by our club
- Other forms of discipline considered appropriate and reasonable by the club

Appeals

Once the complaint has been fully investigated by the club, including but not limited to LCFA, FSA, government agencies and statutory authorities, and a disciplinary sanction has been imposed, all parties will be notified of the outcome and the matter is final. Any disciplinary action is binding. There is no further right to appeal.

7. 1.07 Consent to social media/photography (Play by the Rules Policy)

The club recognises that the use of social media and other online platforms are an efficient and fast way of providing communication, celebrating the club's successes and promoting the club's presence in the wider community. The club however recognises the dangers of such platforms with respect to online grooming and respects the decision of children, young people and families if they do not wish to have their photos and names identified on such platforms. The club requires parents/caregivers to provide consent to social media/photography via the *Child Safe Policy Checklist for parents/caregivers*.

The club refers to the Play by the Rules 'Taking images or video of children at sporting events' [Taking Images of Children at Sporting Events - Play by the Rules - Making Sport inclusive, safe and fair](#) and the FSA Acquiring and displaying images of children [FFSA-Acquiring-and-Displaying-Images-of-Children-2015.pdf \(lcfa.com.au\)](#) for further information about the dangers and risks pertaining to the safety of children and young people.

8. 1.08 Drop-off and collection of children and young people

The club is committed to ensuring that children and young people are dropped off and collected safely and appropriately so that they are not left alone before and after training, matches and events. Coaches and team managers maintain general responsibility for children and young people during training, matches and events, but this requires the support from parents/caregivers to ensure such responsibilities are maintained in a fair, reasonable and practical manner. Safety provisions include children and young people being delivered to and collected from the coach/venue in person. Safety concerns arise when:

- children and young people arrive to training, matches and events unaccompanied by a parent/caregiver
- parents/caregivers collect children and young people at unreasonable times
- children and young people are not collected at all

Procedure:

The club requires parents/caregivers to inform the coaches and or team managers about any changes to their usual drop off/collection arrangements. As a duty of care, if circumstances are that a child or young person hasn't been collected, the coach will take reasonable steps to ensure safety for the child or young person, which will include:

1. The coach asking the assistance of another club person or family to wait with them and the child/young person
2. The coach will attempt to contact parents/caregivers,
3. If after 15 minutes from the end of the training, match or event, the coach is unable to contact parent/caregiver, they will consult with the assisting person to make arrangements to drop the child/young person home
4. If such safety concerns become persistent, the club will be required to consult with the family to seek safer drop-off/collection arrangements for the child/young person

Additionally, the club also requires communication about the drop-off and collection of a child or young person, including:

- When children and young people are unable to attend training, matches and events

- Details of who will be dropping off or collecting children and young people from training, matches and events (when different to normal arrangements)
- If a child or young person will be leaving with another child or young person's family
- If a child or young person has a pre-existing condition or injury which may affect their participation
- If a child or young person's family/parents/caregivers are unable to stay during training, matches and events

The club's expectation is that parents/caregivers will provide any necessary information to the relevant coaches or team manager. Parents/caregivers and club officials will need to ensure that contact numbers have been exchanged and are readily accessible to both parties.

9. 1.09 Chaperone (travel and accommodation)

The club recognises the importance of keeping children and young people safe when travel and accommodation is involved. Often families rely on the availability and capacity of their child and/or young person's coach, team manager or other families to act as chaperone for the purpose of travel and/or overnight accommodation. Chaperoning includes but is not limited to, travel to and from training, matches and events, interstate travel and overnight accommodation for one or more nights that occurs outside Mount Gambier. The club acknowledges that without coaches, team managers and other families acting as chaperone, some children and young people would not be able to participate in the sport to their full potential.

The club is however aware of the need to ensure the safety and well-being of children and young people when being chaperoned by other families or person/s. The club ensures that Coaches, Team Managers, other families or person/s (by the club's request*) providing chaperone to a child or young person has signed the **Appointment of Chaperone Agreement** outlining the responsibilities and expectations of providing safe chaperone and acting as a club representative.

** "By the club's request" does not include private arrangements made between two or more families which the club is unlikely to have any/full knowledge of at any given time. "By the club's request" refers to where the club has actively sought the assistance of another family and or person/s to provide chaperone.*

The club provides a **Chaperone Consent form for parents and caregivers**. This form includes general daytime chaperoning of no more than 120km outside of Mount Gambier and specific chaperoning for travel beyond 120km and/or including overnight accommodation outside of Mount Gambier. Parents/caregivers will need to sign the form and return it to the coach prior to the travel/accommodation. The coach will provide the forms to the child safety officer for record-keeping.

Procedure

Prior to a training, match or event requiring a chaperone for travel and or accommodation, the coaches and or team manager will be required to liaise with the child safety officer so that those identified or volunteering to act as chaperone sign the Appointment of Chaperone Agreement form and complete any applications to ascertain a DHS WWCC or sight a copy of a current DCSI CRES clearance – please refer to the Appointment of Chaperone Agreement form for further information.

10.1.10 Communication (*Play by the Rules Policy*)

The club recognises the importance of timely, respectful, appropriate and accurate communication. The club will use a range of communication channels, including social media, email and SMS to provide information about club-related matters. In some instances, coaches and team managers may need to contact parents/caregivers directly. The club will ensure that all communication respects the privacy and confidentiality of the children, young people and their families.

The club will use a range of electronic tools to communicate with our members. Our communication will protect members' privacy, maintain clear boundaries and ensure that bullying and harassment does not occur.

Facebook page:

- **Our club Facebook** page is an open page for the general public and is monitored for inappropriate comments. It will include current information on training, matches and social events, committees, policies, constitution, rules and by-laws and general updates.
- **Our team Facebook pages** are closed pages only team members, parents/caregivers, committee and coaches will have access. It will include current information on training, matches and social events, committees, policies, constitution, rules and by-laws and general updates
- No offensive content or photos will be published
- If we intend to publish a photo of a child, we will first confirm if consent has been provided by his or her parents/caregivers and take care not to provide identifying information
- We treat all social media postings, blogs, status updates and tweets as public 'comment'
- Postings (written, photos or videos) will be family-friendly and feature positive club news and events
- No personal information about our members will be disclosed
- No statements will be made that are misleading, false or likely to injure a person's reputation

- No statements will be made that might bring our club into disrepute
- Abusive, discriminatory, intimidating or offensive statements will not be tolerated. Offending posts will be removed and those responsible will be blocked from the site

SMS, email and communication apps (Messenger)

Committee members, coaches and team managers may use SMS, email and communication apps (Messenger) to provide information about training, matches, social events and other club business, however:

- SMS messages will be short and about club/team matters
- Email/Messenger communication will be used when more information is required
- Communication involving children and young people will be directed through their parents
- Where appropriate it may be necessary to communicate directly with young people, for example, where young people and adults are coaches OR where English may be the parent's/caregiver's second language and therefore communication is facilitated via the child or young person

Electronic communication:

- Is restricted to club matters
- Must not offend, intimidate, humiliate or bully another person
- Must not be misleading, false or injure the reputation of another person
- Must respect and maintain the privacy of members
- Must not bring the club into disrepute

Non-compliance

Members may face disciplinary action for sending inappropriate electronic communication or posting online content or comments that harass, offend, intimidate or humiliate another member (as outlined in this policy and codes of conduct/behaviour). Under certain circumstances, cyber bullying (e.g. bullying that is carried out through an internet service such as email, a chat room, discussion group, instant messaging or website) is a criminal offence that can be reported to the police. In addition, members who publish false or misleading comments about another person in the public domain (e.g. via Facebook or YouTube) may be liable for defamation. Likewise, the club expects families to conduct themselves appropriately when communicating, sharing information or posting content on social media platforms connected to the club.

11.1.11 Change rooms

The club recognises that change rooms are spaces where children and young people need to know their physical safety and well-being is protected. The club has placed age-appropriate information in change rooms so children and young people know about their own personal safety and adults are aware of the club's behavioural expectations.

The information includes:

- Codes of behaviour
- Guidelines for interacting with children
- FFSA Respect
- The club's commitment statement to being a Child Safe organisation

In addition to the above, the club encourages parents and caregivers to chaperone their children (where age-appropriate) to and from the change rooms in order to promote the safety of their child (this does not include entering the change rooms).

When children and young people require assistance in the change rooms, for example, children getting fitted for their uniform, there must be two adults present (from outside of the change room), one adult to support the child and the other to act as witness. The requirement of adults being present in change rooms is only for purposes considered to be appropriate and or required; children and young people are always afforded privacy and respect when in the change rooms. Photographs are not permitted to be taken in change rooms.

12.1.12 Heat and inclement weather (*Football South Australia*)

The club abides by the Football South Australia (FSA) Extreme Weather Policy 2020. The club acknowledges the risks when playing or participating in extreme cold or hot weather, but is particularly mindful of the impact that such weather can have on children and young people. The club takes direction from Football South Australia with respect to determining the appropriate action to be taken when training or competing in extreme weather. The club refers to the [Footballsouthaustralia.com.au](https://footballsouthaustralia.com.au) – Extreme Weather Policy 2020 (*Appendices B*).

13.1.13 Team Selection – Junior Grades (*Play by the Rules Policy*)

The club is committed to ensuring that junior sport is safe, enjoyable, inclusive and maximises individual participation. The club acknowledges that positive experiences in junior competition will contribute to children developing a lifelong love of sport.

What we will do:

- Emphasise to coaches and parents that junior sport is about participation, not competition
- Modify rules and equipment where possible to include children and young people of all abilities and encourage their participation

- Try to match junior players with others of their own ability (e.g. if there are enough players, have two teams in an age division)
- Provide junior players with a broad range of experiences (e.g. participating in different positions)
- Provide equal playing time for all juniors, regardless of their ability
- Consider boys and girls under 12 years of age playing on the same team, particularly if a team could not otherwise be fielded and rules have been modified
- Ensure that all team members play in the finals

Coaches and Team Managers

- Focus on promoting participation, not winning and losing
- Ensure all team members have the chance to play, rotate through positions and receive equal playing time
- If you coach your own children, treat them like all other team members (e.g. rotations, playing time and participation)

Parents and caregivers

- Help the coach where possible at training and games
- Focus on your child's effort and performance, not the score
- Encourage your child and other team members
- Respect the selection decisions of the coach

A full copy of the Club's Child Safe Policy (including Appendices B: Supporting documents and Appendices C: Forms and Agreements) is available upon request.

Thank you,

Stuart Cooper
President

Carolyn Moyes
Secretary

Dani Atkinson
Child Safety Officer