



five dock **leisure** centre

**FIVE DOCK
LEISURE CENTRE
CHILD SAFE
POLICY MANUAL**

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1. Document History

Document Reference:

Version No: 2

Date of Adoption: February 2021

1.1. Document Location

This document is valid on the day it was printed and can be found at: Five Dock Leisure Centre as a hard copy or on www.fdlc.com.au as a soft copy

1.2. Revision History

Version	Author	Date	Approved By	Approval Date	Review Date
2	FDLC Manager	08-06-2021		08-06-2021	08-07-2022

2. Glossary of Terms and Definitions

2.1 Terms Used in this Policy

CALD	Culturally and Linguistically Diverse.
Child	A child is a person under the age of 16 years. ¹
Child Safe Organisation	A Child Safe Organisation: <ul style="list-style-type: none"> • Consciously and systematically creates conditions that reduce the likelihood of harm to children • Creates conditions that increase the likelihood of identifying and reporting harm • Responds appropriately to disclosures, allegations or suspicions of harm • Addresses all the 10 Child Safe Standards.
Child Safe Standards	The Royal Commission identified 10 critical elements that are necessary to create a safe environment for children and young people. These elements became the 10 Child Safe Standards. The Child Safe Standards articulate the essential elements of a Child Safe Organisation.
Cultural Safety	Encompasses the child being provided with a safe, nurturing and positive environment where they are comfortable with being themselves, expressing their culture...their spiritual and belief systems, and they are supported by FDLC. ²
DCJ	The NSW Government brought together the Departments of Family and Community Services and Justice. The Department of Communities and Justice (DCJ) is the NSW Government Agency responsible for the care and protection of children and young people.
FDLC	Five Dock Leisure Centre.
LGBTIQ	Lesbian, Gay, Bisexual, Transgender, Intersex, Queer.
Mandatory Reporter	Mandatory reporting is the legal obligation for a person who, in the course of his or her professional work or other paid employment delivers health care, welfare, education, children's services, residential services, or law enforcement, wholly or partly, to children (and managers in organisations providing such services). ³
Mandatory Reporter Guide (MRG)	A Structured Decision Making (®SDM) tool intended to complement Mandatory Reporters' professional judgment and critical thinking.

¹ *Children and Young Persons (Care and Protection) Act 1998* (NSW) s 3.

² Australian Human Rights Commission, *Cultural Safety Background Paper*, January 2018, page 8.

³ *Children and Young Persons (Care and Protection) Act 1998* (NSW) section 27.

OCG	NSW Office of Children's Guardian.
Child Participant	Any child or young person participating in programs delivered by FDLC.
Patron	Any adult (not staff) or child who uses the facilities.
Reportable Allegation	Means an allegation that the employee of a Public Authority: <ul style="list-style-type: none"> a) has engaged in conduct that may be Reportable Conduct, whether or not the conduct is alleged to have occurred in the course of the employee's employment, or b) has engaged in conduct that may be Reportable Conduct, unless the conduct is alleged to have occurred outside the course of the employee's employment with the public authority.⁴
Reportable Conduct	Reportable Conduct means the following conduct, whether or not a criminal proceeding in relation to the conduct has been commenced or concluded: <ul style="list-style-type: none"> a) A sexual offence b) Sexual misconduct c) Ill-treatment of a child d) Neglect of a child e) An assault against a child f) An offence under section 43B or 316A of the Crimes Act 1900 g) Behaviour that causes significant emotional or psychological harm to a child.⁵
Risk of Significant Harm	A child or young person is at risk of significant harm if the circumstances that are causing concern for the safety, welfare or well being of the child or young person are present to a significant extent.
Royal Commission	Royal Commission into Institutional Responses to Child Sexual Abuse.
Staff	Includes all paid and unpaid employees, trainees and contractors of FDLC.
WWCC	Working with Children Check.
Young Person	A young person is a person who is between 16 and 18 years of age. ⁶

⁴ *Children's Guardian Act 2019* (NSW) s 18(2).

⁵ *Children's Guardian Act 2019* (NSW) s 20.

⁶ *Children and Young Persons (Care and Protection) Act 1998* (NSW) s 3.

2.2 Forms of Abuse

Child Abuse	<p>Involves acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child or young person. The four forms of Child Abuse are:</p> <ul style="list-style-type: none">• Sexual Abuse• Emotional Abuse• Neglect• Physical Abuse.
Child Grooming	<p>Deliberate acts undertaken to establish a personal connection with a child, in order to prepare the child for sexual abuse.</p>
Emotional Abuse	<p>It is often referred to as 'psychological abuse'. Forms of emotional abuse can include:</p> <ul style="list-style-type: none">• Inappropriate verbal or symbolic acts towards a child or young person• A pattern of failing repeatedly over time to provide a child or young person with adequate non-physical nurture and emotional availability.
Physical Abuse	<p>The use of deliberate physical force against a child that intentionally or unintentionally results, or has the likelihood of resulting, in harm.</p>
Neglect	<p>The failure to provide a child with conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing. Neglectful behaviours are an act of omission, or by wilful choice. Forms of neglect can include:</p> <ul style="list-style-type: none">• Physical• Emotional• Educational• Medical• Nutritional• Environmental.
Sexual Abuse	<p>Acts that expose or involve a child in sexual processes that the child does not fully comprehend, is unable to give consent to or that are beyond acceptable community standards. Examples of sexual abuse include:</p> <ul style="list-style-type: none">• Fondling genitals• Penetration• Exposing a child to pornography.

3. Emergency Contacts

Police	000
Child Protection Helpline (NSW)	132 111

3.1 Child Safety/Protection Officer

The Child Safety Officers (CSO) are the nominated people who oversees child safe practices and addresses child safety concerns. The CSO is the first point of contact for child safe complaints.

The CSO's details are below.

Name	Position	Contact Number	Email
Jimmy Ball	FDLC Manager	9911 6399	jimmy.ball@fdlc.com.au
Derek Moore	Sports Programs Coordinator	9911 6388	derek.moore@fdlc.com.au
Marissa Earle	Operations & Business Improvement Coordinator	9911 6365	marissa.earle@fdlc.com.au
Myree McCosh	Health & Facilities Coordinator	9911 6389	myree.mccosh@fdlc.com.au
Lindsay Nylund	Sports Programs Team Leader Gymnastics	9911 6326	lindsay.nylund@fdlc.com.au
Kristy McDonald	Children's Programs Team Leader	9911 6321	kristy.mcdonald@fdlc.com.au
Russell Dawson	Customer Service & Sales Team Leader	9911 6298	russell.dawson@fdlc.com.au

4. Purpose of this Policy

This policy is created for all stakeholders, including staff, child participants and patrons at Five Dock Leisure Centre (FDLC). The purpose of the *Child Safe Policy Manual* is to ensure all stakeholders understand how FDLC works to keep children and young people safe.

This policy aims to:

- Provide a safe, caring, and nurturing environment for children and young people
- Protect children and young people from harm and abuse
- Create a strong culture of child safety
- Promote diversity and respect amongst children, young people, families and staff
- Ensure all staff understand their responsibilities and the standards of behaviour expected of them
- Provide avenues for complaints and support for children, young people and families
- Create a child safe environment which minimises opportunities for harm and abuse to occur.

5. Scope

FDLC provides various services for children and young people including:

- Stadium sports
- Gymnastics
- Health club – Teen Gym
- School Holiday Programs
- On-site creche.

This policy applies to the following groups of people at FDLC:

Council employees	Administrative staff
Executives	Contractors and sub-contractors
Facility managers	Facility Hirers
Program coordinators or managers	Trainees
Supervisors	Work experience participants

Gymnastics coaches	Students
Sports coaches	Volunteers
Creche staff	Parents/guardians, other family members
Gym instructors and trainers	Spectators
Customer service representatives	Any other adult who interacts with children at FDLC.

Please note the following:

1. All FDLC staff members must also adhere to the *City of Canada Bay Council's Child and Young Person Protection Policy*. For more information refer to Council's website at: <https://www.canadabay.nsw.gov.au/council/council-responsibilities/policies>
2. Gymnastics staff have additional obligations under the *Gymnastics Australia Child Safe Policy*. For more information see: https://www.gymnastics.org.au/images/national/About_Us/By_laws_Policies_Tech_Regs/Child_Safe_Policy_0219.pdf#page=6
3. Fitness Instructors and Trainers must also comply with obligations under *Fitness Australia's Code of Ethical Conduct*. For more information see: https://bp-fitnessaustraliaproduction.s3.amazonaws.com/uploads/uploaded_file/file/483769/Code_of_Ethical_Conduct_v2.pdf

6. Communication of Child Safety Information

FDLC is committed to communicating information about child safety to its stakeholders, specifically key messages contained in the *Child Safe Policy Manual* by:

- Discussing the *Child Safe Policy Manual* during staff induction and ongoing refresher training
- Publishing a downloadable version of the *Child Safe Policy Manual* on the FDLC Website
- Displaying FDLC's Commitment to Child Safety onsite and online
- Discussing the *Child Safe Policy Manual* with children and young people
- Providing families with the *Child Safe Family Handbook* at enrolment.
- Consulting with families and encouraging feedback about FDLC's child safe policies and procedures
- Providing clear and consistent messaging to parents and families to ensure they are aware of how to monitor children's safety at FDLC.

7. Child Safe Standards

7.1 National – 10 Child Safe Standards

This *Child Safe Policy Manual* is underpinned by the 10 Child Safe Standards. The 10 Child Safe Standards are essential elements in creating a *Child Safe Organisation*.

Figure 1. Child Safe Standards - the Royal Commission into Institutional Responses to Child Sexual Abuse.



8. Our Commitments

8.1 To Children & Young People

Children and young people have a right to feel safe and to be respected. FDLC recognises that child safety is everyone's responsibility. As a Child Safe Organisation, we are committed to ensuring that the safety, welfare and wellbeing of children and young people is maintained at all times at facilities managed by FDLC.

We commit to:

→ Providing an environment which fosters the safety and wellbeing of children and young people.	→ Valuing diversity and giving all children and young people, regardless of background or ability, equal opportunities to participate.
→ Empowering children & young people to voice their concerns when they do not feel safe.	→ Ensuring that, where appropriate, all children and young people have access to child safety information, support and complaints processes.
→ Listening and responding to the concerns of children, young people and their parents and/or guardians.	→ Promoting the cultural safety of Aboriginal and Torres Strait Islander children and young people.
→ Ensuring children and young people understand their rights and the boundaries between appropriate and inappropriate behaviour.	→ Emphasising the safety of children and young people with additional needs and providing support where necessary.
→ Supporting children and young people to feel comfortable with their identity and to be in control of their behaviour.	→ Promoting the cultural safety of culturally and linguistically diverse (CALD) children and young people.

8.2 To Families and Communities

Families and communities have the paramount responsibility to ensure that children feel safe, protected and supported in their environment. FDLC aims to provide assistance and resources to families and communities in order to facilitate and promote a child safe environment.

We commit to:

→ Providing a supportive environment for parents and guardians to maximise the safety of children and young people.	→ Maintaining regular contact with parents and guardians about changes or updates to child safe practices.
→ Providing transparent communication with parents and guardians relating to the safety of their children.	→ Listening and responding promptly to any views or concerns raised by parents and guardians relating to child safety.
→ Ensuring that parents and guardians have access to the <i>Child Safe Policy Manual</i> (on site and online) as well as other relevant child safety resources.	→ Ensuring that parents and guardians know to contact the Child Safety Officer to receive further information or to raise any concerns about child safety.

8.3 To Being a Child Safe Organisation

FDLC will implement all necessary measures to provide a safe and supportive environment for children and young people. FDLC is committed to being a Child Safe Organisation in accordance with the Child Safe Standards.

We commit to:

→ Creating an environment where all children, young people and their families feel safe and supported.	→ Monitoring child safe policies to ensure they are effective and up to date.
→ Creating community awareness about child safety.	→ Facilitating the reporting of children at risk of significant harm.
→ Providing a safe physical environment designed to protect children from harm.	→ Educating all staff to recognise the forms and indicators of child abuse.
→ Ensuring the prompt notification and investigation of allegations against Centre staff of all children at risk of harm.	→ Providing staff with child safety professional development opportunities.
→ Regular monitoring of our online environment to ensure safe use and access to our resources.	→ Ensuring that all staff and other stakeholders comply with our <i>Child Safe Policy Manual</i> .

9. Responsibilities of Staff

We believe that child safety is a shared responsibility amongst all staff members. All staff members must:

- Be aware of, and sensitive to, children and young people's age, skill, ability, gender identity, family structure, socio economic background, life experience and cultural identity
- Disclose any alleged misconduct which constitutes or involves Reportable Conduct by another staff member, to their Supervisor, Manager or Child Safety Officer
- Report any allegation of Reportable Conduct made by a child or young person, or their parent, against any staff member to their Supervisor, Manager or Child Safety Officer.

We outline the following Child Safe responsibilities for each position:

9.1 Staff

Including (but not limited to) Gymnastics Coaches, Sports Coaches, Gym Trainers, Creche Staff, Trainees and Administrators. Their child safe responsibilities are to:

- Provide fun and safe services to children and young people
- Deliver services that promote interaction and cooperation between children and young people
- Supervise children and young people in and around FDLC facilities
- Interact with children and young people respectfully and appropriately
- Show concern and interest for the feelings and experiences of children and young people
- Monitor children and young people for signs and indicators of abuse.

9.2 Management

Including (but not limited to) Directors, Managers, Supervisors, Child Safety Officers, Coordinators and Team Leaders. Their child safe responsibilities are to:

- Model appropriate workplace behaviours and monitor the workplace environment to ensure acceptable standards of conduct
- Communicate with parents and guardians about a child or young person's progress
- Receive concerns, allegations, or disclosures of abuse from staff, parents, children or young people

- Provide support to all staff members
- Openly discuss child safety at team meetings
- Ensure an initial risk assessment is completed prior to undertaking activities involving children and young people
- Communicate this policy and promote issues of Child Safety through FDLC's media platforms, websites and resources.

9.3 Senior Management

Senior Management are to:

- Model and foster a commitment to Child Safe practices
- Set accountabilities for child safety at all levels of FDLC
- Inform themselves on all aspects of child safety through training delivered by experts and staying up to date with child safety information
- Foster a culture where anyone can disclose their concerns about harm to children and young people
- Ensure all staff are adhering to acceptable standards of conduct in terms of child safety
- Ensure all staff are equipped with the knowledge, skills and awareness to keep children and young people safe
- Treat all complaints seriously, equitably and confidentially, and take immediate action to investigate and resolve allegations
- Ensure an initial risk assessment is completed prior to undertaking activities involving children and young people.

10. Inclusion

10.1 Children and Young People

Organisations that foster a culture of open communication and participation, create a safe environment for children and young people to voice concerns when they do not feel safe.

FDLC encourages child and youth participation by:

- Empowering children to voice their feedback and concerns through a variety of mechanisms
- Enabling children to develop autonomy, independence, competency, confidence and pride
- Ensuring children and young people understand their right to feel safe at all times
- Ensuring children understand boundaries relating to appropriate and inappropriate conduct
- Discussing the *Child Safe Policy Manual* with children and young people, with a focus on how they can help keep themselves safe and what to do if they feel unsafe
- Taking anything a child or young person says seriously and following up their concerns
- Involving children in organisational decisions, especially about matters that directly affect them
- Prohibiting discrimination in any form - *refer to the Diversity Policy*
- Encouraging children and young people to develop relationships with one another based on mutual trust and respect.

10.2 Equity and Diversity

FDLC actively recognises the diverse circumstances of children and young people and responds to those with additional needs. We pay particular attention to the needs of Aboriginal and Torres Strait Islander children, children with additional needs, children from culturally and linguistically diverse (CALD) backgrounds, and those who form part of the LGBTIQ community.

We ensure the needs of those from diverse backgrounds are met by:

- Ensuring that people from all backgrounds have an equal opportunity to participate in the programs and activities provided by FDLC
- Interacting with all children, families and staff with respect and appreciation for their diverse backgrounds, experiences and abilities
- Ensuring staff members provide equal opportunities for all children to participate in all areas of the programs, and demonstrate anti bias attitudes in their interactions
- Identifying barriers to communication for children with heightened vulnerabilities and those who come from different cultural backgrounds
- Allowing sufficient time, opportunity, and appropriate support for children with disability to raise concerns
- Providing a safe environment for those with a disability and ensuring that they have access to the necessary strategies and support to reach their full capacity
- Providing regular staff training to ensure that they are well equipped to cater for those with additional needs
- Incorporating culturally diverse perspectives into all FDLC policies and procedures
- Ensuring that children have access to bicultural workers if needed, to disclose, report and handle complaints
- Ensuring that key child safe policies are available in other key community languages or modes of communication, if required
- Implementing, and monitoring the outcomes of any strategies in place that are tailored to meet the needs of those who come from diverse backgrounds
- Conducting all activities in accordance with the *Diversity Policy*.

For more detailed information, see *Children with Additional Needs* and the *Diversity Policy* in *FDLC's Policy Manual*.

11. Forms and Possible Indicators of Abuse

Child abuse refers to acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child or young person.

The forms of abuse are:

- Physical abuse
- Sexual abuse
- Emotional or Psychological abuse
- Neglect.

The signs of abuse include physical and behavioural indicators. Individual indicators should not be assessed in isolation and should be looked at in the context of other potential indicators and the personal circumstances or history of the child or young person.

NOTE: The list of signs/indicators of abuse noted below are not exhaustive. The presence of these signs does not necessarily mean that abuse has been, or is, occurring.

11.1 Physical Abuse

Definition

Physical abuse refers to the use of deliberate physical force against a child or young person that intentionally or unintentionally results, or has the likelihood of resulting, in harm.

Possible Indicators

PHYSICAL SIGNS OF PHYSICAL ABUSE	BEHAVIOURAL SIGNS OF PHYSICAL ABUSE
Bruising	Covering up injuries
Fractured bones	Fear of adults
Burns and scalds	Unable to explain an injury
Lacerations and welts	Being aggressive towards others
Sprains and dislocations	Avoiding physical contact

11.2 Sexual Abuse

Definition

Sexual abuse refers to any act that exposes a child to or involves a child or young person in sexual processes that are beyond his or her understanding or contrary to acceptable community standards.

Sexually abusive behaviour can include fondling of genitals, vaginal or anal penetration, voyeurism and exposing a child to pornography. Sexual abuse can be intra-familial (perpetrated by family or relatives), or extra-familial (perpetrated by people outside of the family such as teachers or sporting coaches).

Possible Indicators

PHYSICAL SIGNS OF SEXUAL ABUSE	BEHAVIOURAL SIGNS OF SEXUAL ABUSE
Pain or bleeding in the anal or genital areas	Sexual behaviour beyond healthy development
Bruises and/or bite marks to breasts, buttocks, lower abdomen	Children describing sexual acts
Difficulty walking or sitting	Self-destructive behaviour
Unexplained pain in genital area	Withdrawn behaviour
Bed-wetting beyond the usual age	Regression in development

11.3 Child Grooming

Definition

Sexual abuse also includes **child grooming**. Child grooming refers to deliberate acts undertaken to establish a personal connection with a child or young person, in order to prepare the child or young person for sexual abuse.

There is not a set pattern of grooming, as some perpetrators can abuse a child or young person after a lengthy period, and other perpetrators can abuse in a short period of time.

The main stages of the grooming process are:

1. Gaining access to the victim
2. Initiating and maintaining abuse
3. Concealing the abuse.

Perpetrators can also groom parents and guardians to establish trust and gain access to children and young people.

Possible Indicators

Grooming strategies by perpetrators can include:

Grooming Strategies	
Using favouritism, bribes and/or giving gifts to a child or young person	Violating personal boundaries in the context of intimate care. This includes bathing, toileting and changing clothes.
Spending inappropriate one-on-one time with a child or young person	Insisting on physical affection with a child or young person such as hugging, kissing, tickling even when a child or young person does not appear to want it
Actively isolating children and young people from other adults, children or young people	Communicating with a child or young person via social media when it is not authorised by FDLC

11.4 Emotional or Psychological Abuse

Definition

Emotional abuse is often referred to as 'psychological abuse'. It relates to inappropriate verbal or symbolic acts towards a child or young person and/or a pattern of failing repeatedly over time to provide a child or young person with adequate non-physical nurturing and emotional availability. Emotional abuse damages a child's or young person's self-esteem.

Emotional abuse is usually sustained over a period of time, unlike physical and sexual abuse where a single incident can constitute abuse. It can be the most difficult form of abuse to detect.

Possible Indicators

PHYSICAL SIGNS OF EMOTIONAL ABUSE	BEHAVIOURAL SIGNS OF EMOTIONAL ABUSE
Physical development is delayed	Overly compliant behaviour
Delayed speech	High levels of anxiety or depression
Bed-wetting beyond usual age	Avoids interaction with other children or young people
	Demonstrating low self-esteem
	Lack of trust in people
	Extreme attention seeking

Exposure to domestic violence is now commonly regarded as a form of abuse. For the purposes of this policy, it is included as a form of emotional abuse. It refers to a child or young person being present while a family member is being subjected to abuse. Examples include the child or young person hearing the violence, intervening to stop violence, or being blamed for the violence.

11.5 Neglect

Definition

Neglect refers to the failure to provide a child or young person with the conditions that are culturally accepted as being essential for their emotional development and wellbeing. Neglectful behaviours are an act of omission, or by wilful choice.

Neglect can occur in the following areas:

- Health
- Education
- Emotional development
- Nutrition
- Shelter and safe living conditions.

Possible Indicators

PHYSICAL SIGNS OF NEGLECT	BEHAVIOURAL SIGNS OF NEGLECT
Low weight for age	Stealing food
Poor standards of hygiene	Indiscriminately seeks out adult affection
Untreated physical problems	Being constantly tired
Poor complexion	Frequently late or absent
Frequently left unsupervised by parents/guardians	Being withdrawn

12 Staff and Employment

12.1 Recruitment and Induction

FDLC takes reasonable steps to ensure that all staff are suitable for their specific job role. FDLC conducts rigorous recruitment and screening procedures in accordance with best practices, to ensure that all staff are suitable to work with children and young people.

FDLC ensures that child safety is embedded throughout the following stages of the employment process:

- Job Description
- Screening
- Interview
- Induction
- Probation Period.

1. Job Description

Employment advertising packages must include:

- City of Canada Bay Council's Statement of Commitment to being a Child Safe Organisation
- FDLC's Statement of Commitment to being a Child Safe Organisation
- FDLC's *Child Safe Code of Conduct* and *Child Safe Policy Manual*
- Selection criteria – including attitudes to, and application of child safe measures
- How the applicant will work with children and young people and what their child safe responsibilities are (including reporting obligations)
- Clear child safe responsibilities for the position
- A Working with Children Check clearance and referee checks as a prerequisite to receiving an offer of employment.

2. Screening

FDLC conducts the following screening procedures for the role:

- Verification of applicant's identity, qualifications and professional registration
- Thorough reference checks with at least two identified referees
- Verification of Working with Children Checks prior to commencement at the Centre
- Recording each staff member's cleared Working with Children Check number, its expiry date and the date of verification
- Ensuring that applicants have suitable experience with working with children and young people.

3. Interview

FDLC ensures that the following areas are included throughout the interview process:

- Clear information to applicants about FDLC's commitment to child safety
- Behavioural questions relating to child safe practices
- Questions to assess the values, motives and attitudes of applicant's who will be working directly with children
- Establishing why the applicant is leaving their current job
- Assessment of the applicant's professional experience, qualifications, and competence to work with children.

4. Induction

All new FDLC staff will undertake Child Safe Induction.

As part of the induction process, all new staff must sign a document as acknowledgement that they have read and understood the contents of the *Child Safe Policy Manual* including the *Child Safe Code of Conduct*.

Child Safe Induction covers the following child safety topics:

- Child rights
- Understanding the *Child Safe Policy Manual*
- Understanding the *Child Safe Code of Conduct*
- Forms and indicators of abuse
- Risk management
- Responding to disclosures
- Complaints handling processes
- Reporting obligations
- Protections for whistleblowers.

5. Probation Period

FDLC adopts the following processes in relation to staff probation periods:

- FDLC staff are subject to an initial 3 – 6month probationary period as set out in the employment contract and City of Canada Bay Council's Probation Guidelines
- FDLC management will assess the candidate's work performance and general suitability to work with children and young people.
- FDLC will provide opportunities for staff members to raise concerns formally or informally about harm or risk of harm to children.
- If the new employee does not perform up to the required standard, FDLC may take remedial action or terminate the employment of the staff member.

12.2 Education and Training

All staff are regularly trained and supported to work with children and young people. This ensures staff are equipped and competent to respond to child safety concerns.

FDLC provides regular Child Safe Refresher Training to all staff which covers the following topics:

- Child rights
- Child Participation
- The forms and indicators of child abuse
- Responding to disclosures
- Characteristics of victims and offenders
- Risky environments and situations for children and young people
- Understanding and responding to child-on-child abuse
- Complaints handling
- Reporting obligations
- Risk management
- Record keeping practices
- FDLC's Child Safe policies and practices.

FDLC will:

- Keep a record of Staff participation in child safe training sessions
- Provide more detailed training to staff working in high risk roles and situations
- Provide advanced training to senior leaders, supervisors and staff engaged in the recruitment process
- Ensure that staff training is culturally responsive to the needs of diverse groups.
- Ensure training programs are regularly and externally reviewed.

13. Child Handling and Physical Contact Guidelines

It is the responsibility of FDLC to ensure the safety of children and young people when interacting with others. It is important that children and young people understand their rights and what is considered appropriate and inappropriate behaviour.

FDLC provides comprehensive guidance on child handling to staff who interact with children and young people whilst carrying out their duties and responsibilities in the workplace. This ensures that all staff are adequately equipped to minimise risks of harm to children.

13.1 Consent

FDLC informs parents and guardians of the methods and manual handling that will be applied to children and young people in programs and activities. Staff must ensure that they obtain a child or young person's consent prior to engaging in physical contact.

The staff member must ensure that the child understands:

- What assistance is being provided
- Where the physical contact will occur
- Why it is necessary in relation to the specific skill being taught.

13.2 Physical Contact

All staff members should:

- Avoid one-on-one situations with a child
- Only use physical contact when necessary
- Inform parents of the methods of manual support being used
- Respect the child's personal space
- Adjust teaching methods according to the preference of the child.

13.3 Appropriate Handling and Physical Contact

Physical contact is considered appropriate if it is necessary to promote the child's development of skills, to ensure the child's safety and if it is performed with the consent of the child.

Guidelines to appropriate handling and physical contact include:

- ✓ Gentle handling when making corrections or manipulations
- ✓ Moving the child's body within a comfortable and suitable range of motion
- ✓ Keeping hands visible when using manual support
- ✓ Use of teaching aids to minimise use of unnecessary physical contact
- ✓ Use of non-intrusive touch to comfort a child or young person who is upset
- ✓ Use of non-intrusive touch to encourage a child to participate.

13.4 Inappropriate Handling and Physical Contact

Physical contact is considered inappropriate if:

- The child has not provided prior consent
- It is not required to promote the development of a skill
- The contact occurs outside the class environment
- It poses risk of harm to the child.

Examples of inappropriate handling and physical contact include:

- ✗ Acts that are of a personal nature with the child, if the child is capable of doing so themselves for example, changing clothes and going to the bathroom
- ✗ Touching, especially in areas of a sexual nature such as the breasts, buttocks or genitals
- ✗ Hugging a child in a private setting, or when it is not wanted by the child
- ✗ Kissing a child
- ✗ Aggressive handling when using manual support or demonstrations
- ✗ Intrusive forms of discipline, for example smacking or hitting.

Please note that gymnastics staff have additional obligations in relation to physical contact and handling under the Gymnastics Australia Codes of Behaviour. For more information see:

https://www.gymnastics.org.au/Ga/Child_Safety/Codes_of_Behaviour.aspx

Fitness Instructors and Trainers must also comply with obligations under Fitness Australia's Code of Ethical Conduct. For more information see: https://bp-fitnessaustraliaproduction.s3.amazonaws.com/uploads/uploaded_file/file/483769/Code_of_Ethical_Conduct_v2.pdf

14. Use of Change Rooms

FDLC is committed to providing a comfortable and enjoyable environment that is safe for all children and families who visit FDLC, as well as those who participate in their programs.

FDLC adopts the following guidelines in relation to the use of change rooms to ensure the safety of children and young people:

- Children over the age of 7 are not permitted in the change rooms of the opposite gender
- Children must be supervised by a parent or guardian in the change room at all times
- Staff members should not undress when children or young people are present in the change room. If there are children present, staff should use a private cubicle.
- Do not enter the change room of the opposite gender, under any circumstances
- Knock or announce yourself before entering change rooms or toilets to supervise
- Avoid being in one-on-one situations with children or young people without supervision by another staff member or the child's parent
- The use of mobile phones, cameras and video cameras is strictly prohibited in change room areas and showers
- Routine checks should be performed by Supervisors to ensure all children are adequately supervised.

For further guidance, refer to the following policies in *FDLC'S Policy Manual*:

1. *Creche Policy*
2. *Nappy Change Policy*
3. *Supervision Policy*
4. *Toileting and Water Break Policy.*

15. Use of Photography and Video Devices

FDLC recognises the safety and privacy issues related to the use of photography and video devices in the facility.

To ensure that children and young people are safe when participating in FDLC programs and activities, all staff must:

- Obtain permission from parents/ guardians before taking photographs and videos of children and young people (refer to the *Permission to Publish Photographs form*).
- Ensure that the parent or guardian understands how the image will be used
- Avoid taking photographs or videos of a child or young person where the individual can be identified. For example, try to take the photograph or video from a side angle or from the back.
- Ensure photographs or videos taken do not include other children or young people (who have not provided consent), especially where the individual can be identified
- Seek consent from the child or young person and their parent/guardian prior to posting a photograph or video on the online environment (refer to the *Permission to Publish Photographs form*).
- Ensure camera phones, videos and cameras are not used in changing areas, showers and toilets.

16. Online Environment

FDLC recognises the possible risks to children and young people in relation to the online environment. To mitigate and minimise the opportunity for harm to occur, FDLC ensures that the online environment is used by staff in an appropriate manner.

FDLC will:

- Monitor the online environment
- Provide training to staff with respect to appropriate behaviour online
- Remove any material that is posted online which has the potential to cause harm to children or young people who are participants of FDLC's programs or activities
- Report breaches of the *Child Safe Code of Conduct* or the *Child Safe Policy Manual*.

It is expected that FDLC staff will:

- ✓ Respect the privacy of others
- ✓ Interact with the online environment in a manner which supports a positive and safe online culture for children and young people
- ✓ Share information online which contains appropriate language and content, suitable for children and young people
- ✓ Take responsibility for any comments, advice, opinions, statements or other information which they post online (social media, online forums).

It is expected that FDLC staff will not:

- ✗ Share information which contains inappropriate language or content which may cause harm to children or young people
- ✗ Share personal information, including photographs of children or young people without the informed consent of the parents/guardians
- ✗ Use social media applications whilst at work
- ✗ Tag a child or young person in a photograph on any social media platform
- ✗ Publish any content which may embarrass or cause harm to a child or young person.

17. Complaints Management and Reporting

FDLC is committed to ensuring that children and young people feel safe and respected. To achieve this, FDLC ensures that all child safety complaints are taken seriously and responded to promptly.

FDLC strives to be as transparent as possible throughout the complaints process whilst respecting the privacy of all parties. FDLC will treat all personal information obtained throughout the complaints process in accordance with relevant law.

FDLC will ensure that:

- Any person who makes a complaint will not suffer adverse consequences
- The affected child is provided with ongoing support throughout the complaints process
- The affected child has access to a support person at all times.

Please note that the Complaints Management and Reporting procedures below should be read in conjunction with the City of Canada Bay Child and Young Person Protection Policy.

17.1 Mandatory Reporting

Who are Mandatory Reporters?

Mandatory reporting is the legal obligation for a person who, in the course of his or her professional work or other paid employment delivers health care, welfare, education, children's services, residential services, or law enforcement, wholly or partly, to children (and managers in organisations providing such services).⁷

All employees working within Children's Services, Library Services and Leisure Centres (including line management) are considered by Council as mandatory reporters.

What must be reported?

Where there are concerns that a child or young person is suspected to be at risk of significant harm, staff who are 'Mandatory Reporters' are required by law to make a report to the Department of Communities and Justice (DCJ).

⁷ *Children and Young Persons (Care and Protection) Act 1998 (NSW) section 27.*

A mandatory reporter must make a report if they believe on reasonable grounds that a child is at risk of significant harm of the following forms of abuse:

- Physical abuse
- Sexual abuse
- Psychological harm
- Neglect
- Exposure to family violence.

Risk of Significant Harm Threshold

A child or young person is at risk of significant harm (ROSH) if the circumstances that are causing concern for the safety, welfare, or wellbeing of the child or young person are present to a significant extent. This means it is sufficiently serious to warrant a response by a statutory authority irrespective of a family's consent.

Something that is significant is not minor or trivial, it may reasonably be expected to produce a substantial and adverse impact on the child or young person's safety, welfare or wellbeing, and it can result from a single act or omission or an accumulation of these.

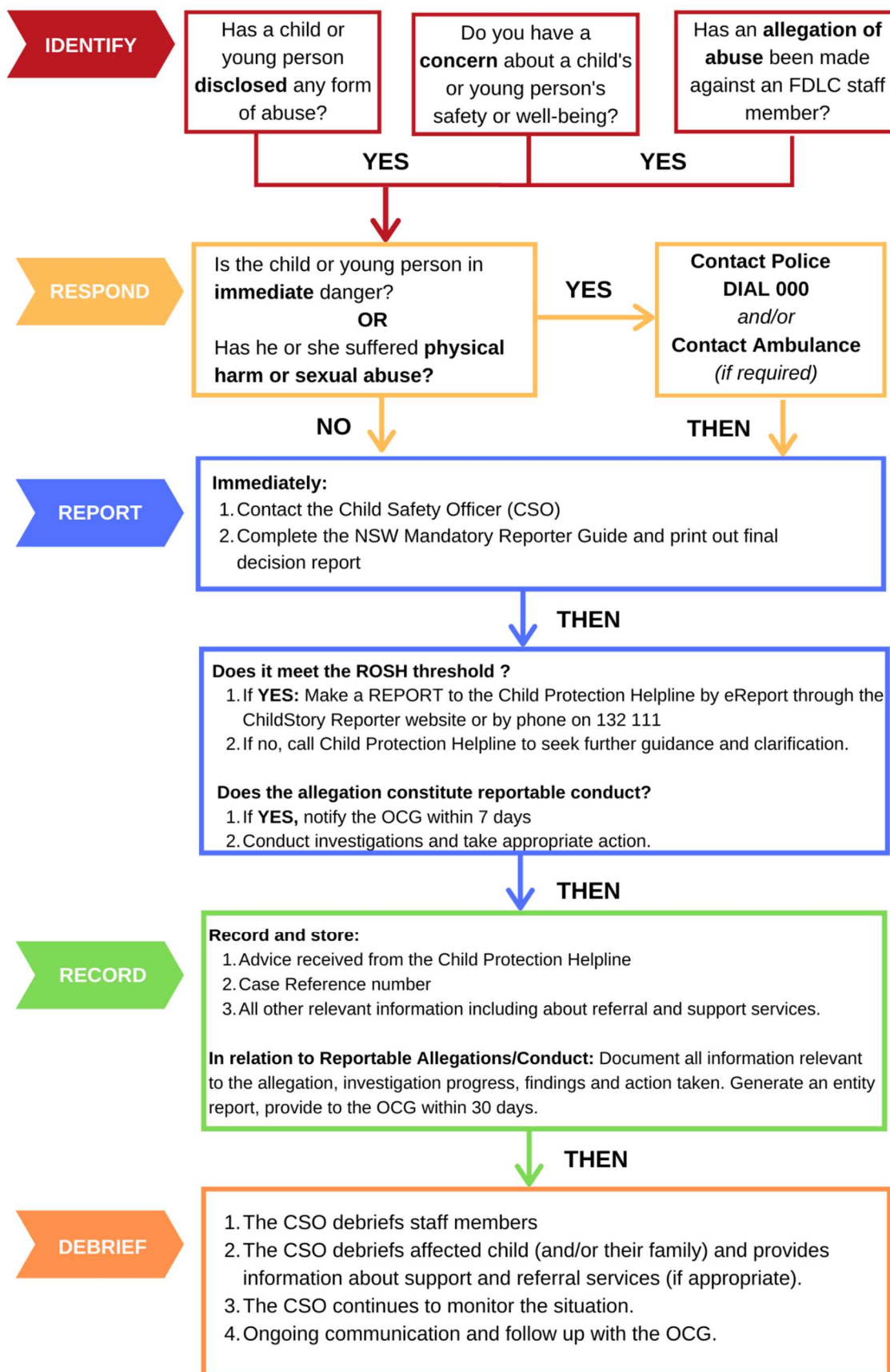
Refer to the *City of Canada Bay Council's Child & Young Person Protection Policy* to access the Risk of Significant Harm Threshold flowchart.

Making a Report



If a staff member suspects on reasonable grounds that a child or young person may be at risk of significant harm, staff members will:


- Discuss their concerns with relevant centre staff. Discussion and sharing of information is strictly on a "need to know" basis.
- Access the online mandatory reporters guide at <https://reporter.childstory.nsw.gov.au/s/mrg> to assess whether a child is at risk of significant harm
- Make an eReport through the ChildStory Reporter website or by calling the Child Protection Helpline on 132 111.



17.2 Child Safe Complaints Flowchart



17.3 Child Safe Complaints Process

Step 1 IDENTIFY 	Indicators	<ul style="list-style-type: none"> Identify if a child or young person has been, is being, or is at risk of being abused or neglected by an adult or another child. Refer to the <i>Child Safe Code of Conduct – Child Handling and Physical Contact Guidelines</i>. Refer to physical and behavioural indicators of abuse. Examples are detailed in <i>Section 11</i>.
	Disclosure, Concern or Allegation	Identify whether: <ul style="list-style-type: none"> A disclosure of abuse has been made by a child or young person, or A concern has been raised about a child or young person’s safety or well-being, or An allegation has been made against a person (staff, parent or guardian, a child or young person, other person) concerning behaviour towards a child or young person.
Step 2 RESPOND 	Listen	<ul style="list-style-type: none"> Allow the child or young person to use their own words when expressing their concerns. Remain calm and patient. Avoid adverse emotions, such as anger, as it may scare the child. Only ask enough questions to confirm the need to report the matter. Do not use leading questions. If the abuse happened on-site, ask the child or young person if the person is still in the building and if they can describe the person. If the abuse happened at home, ask the child or young person to provide more detailed information.
	Reassure	<ul style="list-style-type: none"> Reassure the child or young person that they have done the right thing by voicing their concern. Reassure the child or young person that what has happened is not his/her fault and validate his/her feelings.
	Respect	<ul style="list-style-type: none"> Believe the child or young person. Respect that it may take time for the child or young person to disclose further information.

		<ul style="list-style-type: none"> • Avoid making promises that cannot be kept, for example, not telling others. • Explain to the child or young person that you may need to tell someone else to keep them safe.
	Respond	<ul style="list-style-type: none"> • Where a child or young person is in immediate danger that requires urgent intervention by the police, DIAL 000. • If the child or young person has experienced physical harm or injury, contact the Ambulance immediately on 000. • Do not leave the child or young person alone.
Step 3 REPORT 	Child Safety Officer (CSO)	<ul style="list-style-type: none"> • Regardless of whether the police were contacted, immediately notify the CSO of the disclosure, concern, or allegation and seek further guidance.
	Mandatory Reporter Guide	<ul style="list-style-type: none"> • Access and complete the Online Mandatory Reporters Guide at https://reporter.childstory.nsw.gov.au/s/mrg to assess whether a child is at Risk of Significant Harm • Print out a copy of the final decision report and save it for Centre records
	Child Protection Helpline (132 111)	<ul style="list-style-type: none"> • If the Risk of Significant Harm threshold IS met, make a report to the Child Protection Helpline within 24 hours. • If the Risk of Significant Harm threshold IS NOT met, call the Child Protection Helpline to receive further clarification, advice and to discuss possible options for referral and support services available to the family if appropriate.
	Office of Children's Guardian	<ul style="list-style-type: none"> • If the concern, disclosure or allegation involves a staff member, and the allegation is considered to be reportable conduct, immediately make a report to the OCG. • As soon as practicable after receiving the reportable allegation, initiate investigations.
	Parent/Guardian	<ul style="list-style-type: none"> • Contact the child or young person's parent/guardian if they are not on-site and it is safe to do so.
Step 4	Document	If the threshold WAS met, make a record of the following:

<p>RECORD</p> 		<ul style="list-style-type: none"> • Date and time of call for Child Protection Helpline • Advice received from the Child Protection Helpline • The Reference Number given by the Child Protection Helpline • Details of telephone and personal conversations with parents or the Child Protection Helpline <p>If the threshold WAS NOT met:</p> <ul style="list-style-type: none"> • The Team Leader will contact the Child Protection Helpline to discuss possible referral options for the family • Access HSNet at www.hsnet.nsw.gov.au or Families NSW for information. <p>Reportable Allegations/Conduct</p> <ul style="list-style-type: none"> • Document information about the allegation, progress of investigation, findings and action taken. • Make a finding of reportable conduct is satisfied. • Provide documented information to the OCG
	<p>Confidentiality</p>	<ul style="list-style-type: none"> • Ensure that all records relating to the report are kept in a secure and confidential location, separate to the child's individual file.
<p>Step 5</p> <p>DEBRIEF</p> 	<p>Employee</p>	<ul style="list-style-type: none"> • If appropriate, CSO to debrief with affected staff member and offer counselling services if required. • The Head of Agency will notify the employee if an allegation of Reportable Conduct has been made against them.
	<p>Child</p>	<ul style="list-style-type: none"> • If appropriate, CSO to follow up with the child/young person or their family and inform them of the outcomes and resolution of the situation (if appropriate). • The CSO should document all communications. • If appropriate, CSO to connect the child/young person and/or their family with support services.
	<p>Office of Children's Guardian</p>	<ul style="list-style-type: none"> • The Head of Agency to send a report to the OCG • Continued communications and follow up about the situation.

17.4 Protections for Reporters

The *Children and Young Persons (Care and Protection) Act 1998* (NSW) protects any person who makes a report in good faith. Staff must identify themselves to the Department of Communities and Justice when they make a report, however, their identity remains confidential.

No one is allowed to identify a person who makes a report to anyone else unless the reporter gives permission or a court order requires the disclosure.

The legislation also protects staff in the following circumstances:

- Making a report does not amount to a breach of professional ethics or confidentiality
- Liability for defamation will not be incurred because of a report
- The report is not admissible in any proceedings as evidence against the person who made the report
- A person cannot be compelled in any proceedings to provide the report or give evidence of any of its contents.

Further, there will be no punishment for children, families, staff or volunteers for raising child safety issues with FDLC management staff.

17.5 Reportable Conduct

What is Reportable Conduct?

The *Children's Guardian Act 2019* (NSW) defines reportable conduct as being:

- A sexual offence committed against, with or in the presence of a child
- Sexual misconduct with, towards or in the presence of a child
- Ill treatment of a child
- Neglect of a child
- An assault against a child
- Behaviour that causes significant emotional or psychological harm to a child
- Any offence under section 43B or 316A of the *Crimes Act 1900*, whether or not, with the consent of the child.

Who Must Make a Report?

If a reportable allegation (i.e. an allegation of reportable conduct) is made against a FDLC employee, contractor or volunteer, FDLC Senior Management must:

1. Notify the OCG within **7 business days** of becoming aware of the allegation
2. Assess and manage any risks to children and other parties involved
3. Plan and conduct an appropriate investigation into the reportable conduct, allegations or convictions
4. Provide an update to the OCG **within 30 days**
5. Make a finding for all allegations
6. Provide an Entity report to the OCG about the finding and action(s) taken.

To find out more information refer to *Canada Bay Council's Child and Young Person Protection Policy*.

18. Risk Management

Certain physical environments can pose a risk to children and young people. Child Safe Organisations improve safety by analysing and addressing risks, reducing opportunities for harm and increasing the likelihood of perpetrators being caught.

FDLC recognises the increased risk associated with specific roles and activities, particularly in situations where staff members are working in one-on-one situations with children unsupervised. FDLC staff are to conduct risk assessments of events and activities where children and young people may be at risk of harm using the *City of Canada Bay Risk Assessment Form*.

FDLC adopts a situational prevention approach to risk management, underpinned by the following principles:

- Creating and protecting value in the organisation and its decision making
- Addressing uncertainty through being systematic, structured and timely
- Taking into account human and cultural factors
- Being transparent, inclusive and responsive to change.

18.1 Risk Management Procedure






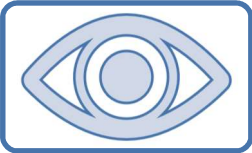
Prior to undertaking the risk management procedure, it is important to consider the context of your organisation, the different environments of operation, as well as the types of activities and programs provided.

FDLC ensures that information about risks and their management strategies are reported to be used as a basis for all decision making. Throughout the risk management procedure, it is important to ensure continuous:

- 1. Communication and Consultation** with all stakeholders involved, including staff, families, children and young people (where appropriate) to ensure that all possible risks are identified, and that effective and practical management procedures are in place.
- 2. Monitoring and Review** of the strategies that have been implemented. Ensure that the strategies are practical and effective for day-to-day use. Adopt continuous review procedures to ensure the strategies remain up to date and relevant to reduce appropriate risks.

18.2 Reporting Risks

How to complete a risk assessment:

	Identify the Hazard <ul style="list-style-type: none">• Review incident and accident data• Conduct audits
	Identify the Risk <ul style="list-style-type: none">• Is it related to Work, Health and Safety?• Is it related to Child Safety and risks of abuse?
	Assess the Risk <ul style="list-style-type: none">• What is likelihood of the hazard resulting in the risk?• How severe are the potential consequences?
	Control the Risk <ul style="list-style-type: none">• What strategies can be implemented to minimise the risk?• Are the options practicable?
	Document the Process <ul style="list-style-type: none">• Has a risk assessment been completed?• Have the stages of risk assessment been recorded?
	Monitor and Review <ul style="list-style-type: none">• Is the assessment process subject to constant monitor and review?• Are the implemented strategies and processes subject to review?

Stage 1: Identification

It is important to be aware of hazards and risks which may cause harm. It is everyone's responsibility to ensure that an identified hazard or risk is reported. There are various risks which occur in different environments. When identifying risks, you should consider Work, Health and Safety (WHS) as well as potential risks of child abuse.

To identify risks in the leisure and recreation environment, consideration should be given to the following areas:

- The source of the risk
- The area of impact
- The events that may cause the risk
- The causes of the risk
- The consequences of the risk.

The table below provides examples of behaviours which may indicate that a risk of child abuse exists.

RISKS TO CHILDREN			
Physical Abuse	Neglect	Psychological Abuse	Sexual Abuse
<ul style="list-style-type: none"> • Pushing, hitting, kicking • Physical punishments • Rough handling 	<ul style="list-style-type: none"> • Poor supervision • Lack of adequate food, shelter or clothing 	<ul style="list-style-type: none"> • Isolation from others • Verbal aggression • Intimidation and controlling behaviour 	<ul style="list-style-type: none"> • Grooming behaviour • Inappropriate touching • Inappropriate conversation of a sexual nature

Stage 2: Assessment of the Risk

When a potential hazard or risk is identified, management staff are responsible for:

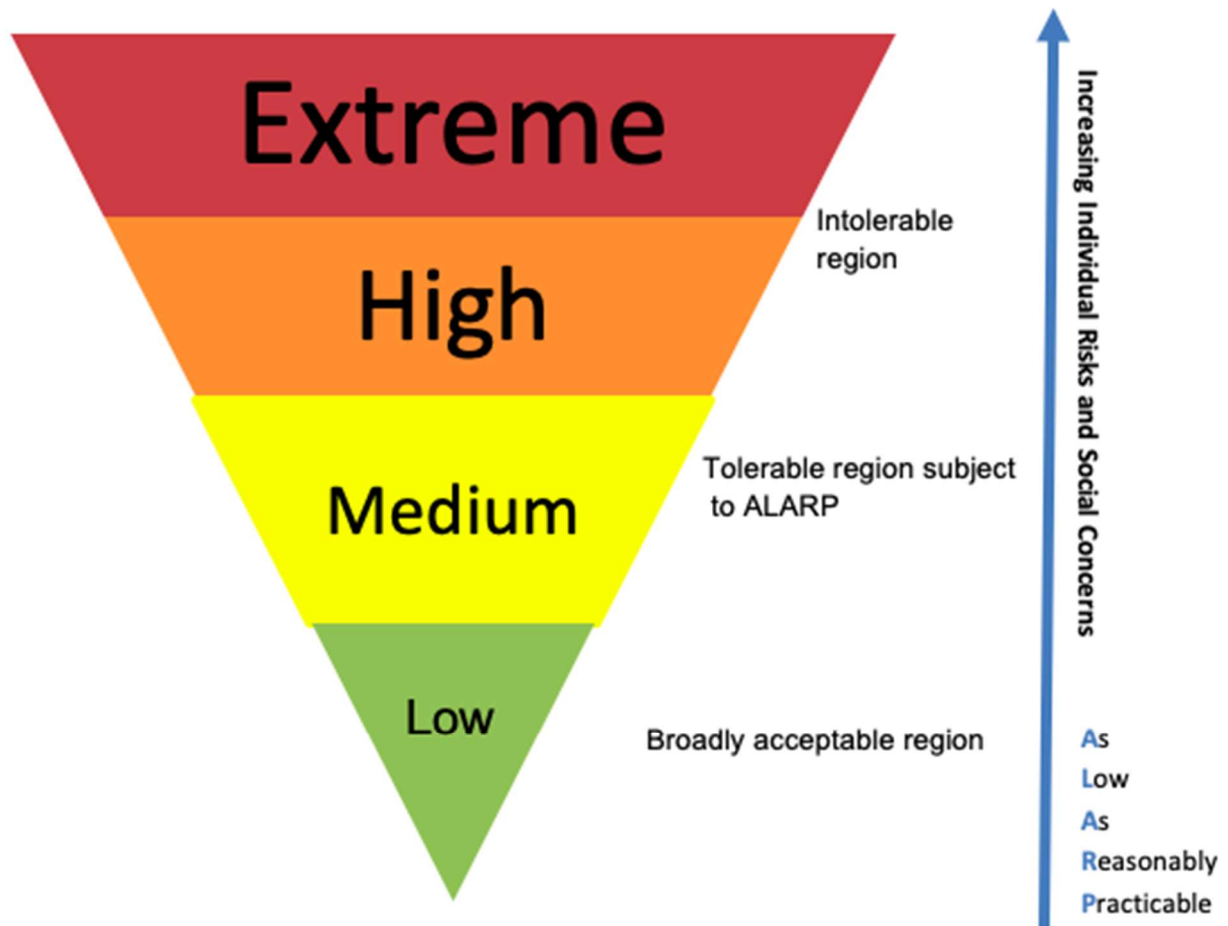
- Assessing the risk of injury
- Evaluating the potential consequences, exposure and probability of each identified hazard/risk
- Assigning an appropriate risk-level.

Risk Tolerance

Management staff should first determine the organisation’s readiness to bear the risk after treatments have been implemented. It is the duty of management staff to ensure that the risk of injury is reduced as far as is reasonably practicable.

All risks should be treated in accordance with the *As Low as Reasonably Practicable* (‘ALARP’) principle. This requires risks to be treated in a way which reduces the risk to a level that is as low as possible after the controls have been implemented.

Where treatments are identified as reasonable, risks should be treated based on their relative level of risk. The risks identified at the highest level should be treated first.



Risk Level	Urgency
Extreme	Intolerable Region Immediate response required until the risk is treated. Must be treated as soon as possible.
High	
Medium	Tolerable Region (ALARP) Treat as soon as practicable, but within at least a year
Low	Broadly Acceptable Region Ongoing control as part of general or routine management

Consequence & Likelihood

Once the Risk Tolerance has been established, the supervisor/management staff should then consider the resulting consequences and the likelihood of them occurring as a result of the risk.

Please see below:

- Consequence Table
- Likelihood Table.

Consequence Table

Use the following table to determine the severity of the possible consequences of child safety risks.

Category	Consequence	Description
1	Insignificant	<ul style="list-style-type: none"> • Minor injury, altercation or mishap • No first aid treatment or support for stress/trauma event required.
2	Minor	<ul style="list-style-type: none"> • Environmental surroundings may contribute to child being at risk • Minor behavioural issues • Minor first aid and support for stress/trauma event required.
3	Moderate	<ul style="list-style-type: none"> • Serious injuries and/or illness requiring medical attention • Complex welfare and/or health issue • Serious stress/trauma event requiring professional support.
4	Major	<ul style="list-style-type: none"> • Injuries requiring hospitalisation • Child missing from main group • A child is at risk of significant harm and/or neglect • Stress/trauma event requiring ongoing clinical support.
5	Catastrophic	<ul style="list-style-type: none"> • Critical incident • Death or disability of child • Stress/trauma event requiring extensive clinical support for multiple individuals • High level of distress to other parties.

Likelihood Table

Use the following table to estimate how likely it is that the consequence will occur, as a result of exposure to the risk.

Category	Level	Probability
A	Almost Certain	<ul style="list-style-type: none"> Almost certain to occur in most circumstances
B	Likely	<ul style="list-style-type: none"> Likely to occur frequently
C	Possible	<ul style="list-style-type: none"> Possible and likely to occur at some time
D	Unlikely	<ul style="list-style-type: none"> Unlikely to occur but could happen
E	Rare	<ul style="list-style-type: none"> May occur but only in rare and exceptional circumstances

Risk Matrix Tool

Once you have determined the appropriate category of consequences and the likelihood of risk, you can use a risk matrix tool to determine a risk score.

Results		PROBABILITY				
		Rare	Unlikely	Possible	Likely	Almost Certain
SEVERITY	Catastrophic	Medium (8)	High (16)	Extreme (20)	Extreme (23)	Extreme (25)
	Major	Medium (7)	Medium (12)	High (17)	Extreme (21)	Extreme (24)
	Moderate	Low (4)	Medium (10)	High (15)	High (18)	Extreme (22)
	Minor	Low (2)	Low (5)	Medium (11)	High (13)	High (19)
	Insignificant	Low (1)	Low (3)	Low (6)	Medium (9)	High (14)

Risk Tolerance Levels

The risk score determined using the Risk Matrix Tool can provide an indication of the priority level of the risk, indicating the urgency to take remedial action.

Risk Rating	Risk Treatment
Extreme 2-25	<ul style="list-style-type: none">• Activities must be suspended immediately until risks can be eliminated, controlled or reduced to a lower level.• Report risk to your manager or director, and contact Council Risk Management Officer for advice.
High 13-19	<ul style="list-style-type: none">• Risks are considered significant.• Ensure all controls identified are in place and review processes regularly.• Contact Council Risk Management Officer for advice.
Medium 7-12	<ul style="list-style-type: none">• Risks are considered acceptable.• Ensure all controls identified are in place and schedule regular review.
Low 1-6	<ul style="list-style-type: none">• No significant risks exist.• Ensure controls are in place and monitor progress.

Stage 3: Controlling the Risk

Risk control involves the development and adoption of interventions designed to reduce the level of risk to one that is as low as reasonably achievable. To achieve this effectively you need to identify and consider relevant prevention strategies, procedures and processes that can be implemented.

It is management's responsibility to ensure that:

- Measures to reduce the risk of injury are utilised effectively and that risks of injury are reduced as far as is reasonably practicable on a day to day basis
- All staff are adequately trained in the full and proper use of any safe systems of work.

The following table provides the preferred sequence to apply when controlling risk in the workplace. The sequence has been adopted from the *National Work, Health and Safety Commission* and is referred to as the *Hierarchy of Controls Measures*.

Method	Process	Examples
Elimination	Eliminate the hazard and risk from the workplace completely	Remove access to enclosed, unsupervised areas
Substitution	Substitute the hazard with something safer	Construct barriers preventing access to enclosed areas
Isolation	Physically separate the problem from staff	Install barriers between staff and participants if there is risk of assault
Engineering Controls	Physical control measure to minimise the risk	Re-design equipment and work processes Install adequate lighting in dark areas
Administrative Controls	Provide appropriate training, written work procedures, adequate supervision, signs, maintenance of equipment or limitation of exposure	Give appropriate training to all staff Provide adequate warning signs

Child Safe Situational Prevention Approach

Situational prevention aims to reduce the likelihood of inappropriate behaviour being carried out by making systematic and permanent changes that:

1. Increase the effort for inappropriate behaviour to be carried out
2. Increase the risks of perpetrators being caught
3. Make it harder for perpetrators to excuse or dismiss inappropriate behaviour.

See overleaf a table of *Child Safe Situational Prevention Strategies*, a guide provided by the NSW Office of the Children's Guardian.

Please note that the table is a guide only and does not contain an exhaustive list of strategies to be implemented.

Child Safe Situational Prevention Strategies

Increase the Effort	Increase the Risks	Remove Excuses
<p style="text-align: center;">Deflect Offenders</p> <ul style="list-style-type: none"> - Use of signage indicating FDLC's commitment to child safety - Publish FDLC's commitment to child safety on public platforms i.e. website 	<p style="text-align: center;">Extend Guardianship</p> <ul style="list-style-type: none"> - Encourage and support the inclusion of children in decision making - Empower children to speak up if they do not feel safe - Create a child-centred culture within FDLC 	<p style="text-align: center;">Set Rules</p> <ul style="list-style-type: none"> - Implement codes of conduct for staff and facility users - Role descriptions and expectations outlining the duties of staff - Implement child safe policies and guidelines
<p style="text-align: center;">Screen Applicants</p> <ul style="list-style-type: none"> - Ensure registration requirements to work with children are in place - Perform reference checks to confirm prior employment history - Implement probation periods - Thorough interview process 	<p style="text-align: center;">Assist natural surveillance</p> <ul style="list-style-type: none"> - Ensure physical environment is well lit and is designed with open spaces - Ensure that all stakeholders are aware that complaints and concerns will be taken seriously 	<p style="text-align: center;">Poster instructions</p> <ul style="list-style-type: none"> - Use age appropriate posters and information to inform kids how to stay safe - Posters indicating FDLC's commitment to being a Child Safe Organisation - Poster informing stakeholders how to make a complaint
<p style="text-align: center;">Physical environment</p> <ul style="list-style-type: none"> - Ensure secluded areas are not accessible - Reduce opportunity for children to be in secluded areas 	<p style="text-align: center;">Reduce anonymity</p> <ul style="list-style-type: none"> - Ensure all staff members are easily identifiable by stakeholders - Provide feedback mechanisms that are easily accessible 	<p style="text-align: center;">Alert consciousness</p> <ul style="list-style-type: none"> - Provide ongoing support and guidance about Child Safe Best Practice - Disciplinary policies outlining consequences of breaching the <i>Child Safe Code of Conduct</i>

Control Effectiveness Table

After the appropriate strategy has been implemented to eliminate or minimise a risk, it is important to review the effectiveness of the control measure.

Level	Extent	Reliability	Availability	Effectiveness
5	Very High	Mostly Reliable	Always	Mostly Effective
4	High	Often reliable	Mostly	Often effective
3	Moderate	Somewhat reliable	Sometimes	Somewhat effective
2	Low	Rarely reliable	Rarely	Rarely effective
1	Very Low	Not reliable	Not	Not effective

Stage 4: Documentation

Risk Assessments

All risk assessments performed for physical hazards and FDLC activities must be recorded using the *City of Canada Bay Risk Assessment Form*.

Stage 5: Monitor and Review

It is integral that the process of risk management is subject to continuous monitoring and review to ensure that the stages remain relevant to the various risks and hazards which are prevalent in the specific environment.

19. Breaches of the Child Safe Policy Manual and Child Safe Code of Conduct

FDLC will promptly respond to all breaches, and will manage the process in a fair, unbiased and supportive manner. The following steps will be taken:

- All persons concerned with the breach will be advised of the process
- All persons concerned with the breach will be able to provide their version of events
- The details of the breach, including the versions of all involved parties and the outcome will be documented and recorded
- All matters discussed and information shared in relation to the breach will be kept confidential
- A suitable and appropriate outcome will be decided.

Depending on the nature of the breach, suitable outcomes may include:

- Emphasis on the relevant component of the *Child Safe Policy Manual* e.g. the *Online Environment*
- Providing closer supervision
- Specific education and training
- Mediation between the parties involved in the incident (where appropriate)
- Disciplinary measures (if necessary)
- Review of current policies and procedures, with updates and developments if necessary.

20. Record Keeping & Information Sharing

FDLC keeps complete and accurate records of all incidents, responses and decision-making relevant to child safety and child wellbeing for a period of 40 years.

We ensure that all records are:

- Maintained appropriately in a clear, logical and secure manner
- Dealt with in accordance with the relevant law or policy
- Available for individuals who have a right to access institutional records which contain their personal information.

20.1 Sharing Information with Prescribed Bodies

FDLC does not disclose sensitive personal information to third parties without permission or instruction from the individual, unless required by law to do so.⁸

FDLC is allowed to exchange information that relates to a child or young person's safety, welfare or wellbeing, whether or not the child or young person is known to Community Services or whether the child consents to the information exchange. See *Chapter 16A of the Children and Young Persons (Care and Protection) Act 1998 for a full list of the prescribed bodies.*

If FDLC receives a request for information, the Centre Manager will:

- Confirm the person's identity by contacting the agency before providing the information
- Request that agencies make their request in writing and provides the following information:
 - Identifies the child
 - Explains how the information relates to the safety, welfare or wellbeing of the child
 - Explains why the information will assist to make a decision, assessment or plan, or to initiate or conduct an investigation, or to provide any service, or to manage any risk to the child
 - Provides sufficient detail to assist the centre to understand the purpose of the request and to locate the relevant information in an efficient manner
 - Provides background information relevant to the request, including whether or not the agency has informed a child, parent that the information has been sought and if not, why not
 - Indication of a realistic time frame for the centre to provide the information.

⁸ *Children and Young Persons (Care and Protection) Act 1998 Chapter 16A.*

- Ensure that the information requested relates to a child's safety, welfare or wellbeing
- Identify whether the information requested can be used to make a decision, assessment or plan; initiate or conduct an investigation; provide a service or manage a risk in relation to the safety, welfare or wellbeing of a child or a class of children
- Identify whether or not to inform the parent or guardian that a request for information has been made
- Document all conversations and information that are shared with the agency
- File all information in our Database saved in a separate file under the child's profile. Any paper documents will be shredded.

If FDLC makes a request under the Act, the Centre Manager will:

- Ensure that the information requested relates to a child's safety, welfare or wellbeing
- Identify whether to inform that parent/guardian that a request for information is being made
- Put all requests in writing. Written requests will:
 - Identify the child
 - Explain how the information relates to the safety, welfare or wellbeing of the child
 - Explain why the information will assist to make a decision, assessment or plan, or to initiate or conduct an investigation, or to provide any service, or to manage any risk to the child
 - Provide sufficient detail to assist the other agency to understand the purpose of the request and to locate the relevant information in an efficient manner
 - Provide background information relevant to the request, including whether or not the agency has informed a child, or parent that the information has been sought and if not, why not
 - Indicate a realistic time frame for the agency to provide the information.

FDLC ensures that all staff and volunteers are aware of and understand their rights regarding the collection of data, information sharing and recording keeping.

For further information refer to the *City of Canada Bay's Records Management Policy* and the *Confidentiality Policy* in *FDLC's Policy Manual*.

21. Continuous Review and Improvement

FDLC is committed to ensuring the *Child Safe Policy Manual* and child safe practices are continuously reviewed and improved. We achieve this by:

- Reviewing the *Child Safe Policy Manual* and related policies on an annual basis
- Welcoming feedback from staff, parents/guardians, and children and young people
- Conducting a review as soon as a complaint is made, and again when the complaint is finalised
- Holding consultations with staff, families and children and young people
- Responding to feedback and complaints in a timely manner
- Ensuring complaints and concerns are analysed to identify causes and systemic failures to inform continuous improvement
- Providing staff with ongoing child safe education and training.

When conducting an annual review of the *Child Safe Policy Manual*, the following should be considered:

- Whether policies and procedures were followed
- Whether any incidents relating to child safety occurred
- The process used to manage any incidents
- The effectiveness of policies and procedures in preventing or minimising harm to children and young people
- The content and frequency of training in relation to the *Child Safe Policy Manual*.

22. Version Control

Version control is an effective method of managing the creation and development of policies and procedures. It records key elements relating to the creation and development of the document over time. FDLC adopts version control to ensure accuracy and transparency of all FDLC documentation.

FDLC ensures that all versions of policies and procedures:

- State the document's reference number, version number and location of the document
- Contain a *Revision History Table*
- Are revised with reference to previous versions of the relevant policy and procedure, as shown in its *Revision History Table*
- Are stored in a secure manner, protected by a security password
- Can be accessed by all staff.

23. Policy Review

Date Adopted/ Approved:	
Review Date:	June 2022
Version:	2
Responsible Position:	Child Safety Officer

24. Relevant Legislation, Policies and Documents

Child Protection (Working with Children) Act 2012 (NSW)

Children and Young Persons (Care and Protection) Act 1998 (NSW)

Children's Guardian Act 2019 (NSW)

City of Canada Bay Child and Young Person Protection Policy

City of Canada Bay Risk Assessment Form

Children with Additional Needs Policy

Confidentiality Policy

Diversity Policy

Incident, Injury, Trauma and Illness Policy

Interaction with Children Policy

Member Protection Policy

Nappy Change Policy




Providing a Child Safe Environment Policy





Supervision Policy

Toileting and Water Break Policy

Permission to Publish Photographs Form

APPENDIX A – CHILD SAFE CODE OF CONDUCT

	APPROPRIATE: STAFF MUST	INAPPROPRIATE: STAFF MUST NOT
<p>Communication</p> 	<ul style="list-style-type: none"> • Talk to children and young people in a professional and supportive manner • Use language that creates a fun and inclusive environment • Listen to and respect what children and young people have to say • Communicate with children, young people and their families through authorised channels for example by work email or telephone • Impart knowledge and skill in a respectful and encouraging manner. 	<ul style="list-style-type: none"> • Use abusive, derogatory or offensive language • Have open discussions about inappropriate adult themes in the presence of children and young people • Single out a child or young person in a humiliating manner • Use personal social media platforms to communicate with children, young people, or their families.
<p>Supervision</p> 	<ul style="list-style-type: none"> • Ensure all children and young people (under 16) are supervised by a responsible parent/guardian at all times • Ensure that staff remain readily accessible and within the visibility of other staff whilst with children • Perform random checks of obstructed and out-of-the-way locations (for example, change rooms). 	<ul style="list-style-type: none"> • Be alone with children in a direct, unsupervised capacity • Travel alone with a child or young person • Withdraw children or groups of children into areas where they are not visible by other staff members, or taken into rooms that can be locked • Permit a child or young person to go with another parent/guardian without the written consent of the authorised parent/guardian in custody matters.
<p>Physical Contact</p>  <p>See Section 13 - <i>Child Handling and Physical Contact Guidelines</i> for further information.</p>	<ul style="list-style-type: none"> • Ensure that any physical contact is appropriate to the situation and necessary for the child's skill development • Use gentle handling when making corrections or manipulations • Only move the child's body within a comfortable and suitable range of motion • Keep hands visible when providing manual support • Be cautious when using hands on correction whilst the child is still moving 	<ul style="list-style-type: none"> • Perform acts that are of a personal nature with the child, if the child is capable of doing so themselves such as changing clothes and going to the bathroom (unless following the <i>Nappy Change Policy</i> or <i>Toileting and Water Break Policy</i>) • Touch the child or young person in areas of a sexual nature such as the breasts, buttocks or genitals • Smack or hit a child as a form of discipline.

	<ul style="list-style-type: none"> Utilise teaching aids to minimise the amount of physical contact. 	<ul style="list-style-type: none"> Allow a child to smack or hit another student in the class.
<p>Photography and Videos</p> 	<ul style="list-style-type: none"> Obtain informed consent from parents/guardians before taking photographs and videos of children and young people Refer to the <i>Permission to Publish Photographs Form</i>. 	<ul style="list-style-type: none"> Share personal information, including photographs of children or young people without the informed consent of the parents/guardians Tag a child or young person in a photograph on Facebook Use photography or video devices in change rooms or bathrooms.
<p>Change Room Facilities</p>  <p>See Section 14 – Use of Change Rooms for further information.</p>	<ul style="list-style-type: none"> Ensure adequate supervision of children in change rooms, whilst respecting the child's right to privacy Ensure a staff member is supervised by another staff member if taking a child student to the bathroom Knock or announce yourself before entering change rooms or toilets to supervise Respect children's privacy when changing in the public area of the change room. 	<ul style="list-style-type: none"> Undress when children or young persons are present in the change room Enter the change room of the opposite sex, under any circumstances Be in one-on-one situations with children or young persons without supervision by another staff member or the child's parent Use change rooms whilst students are present. If so, the staff member should utilise a private cubicle to undress as it is not appropriate for a teacher to undress alongside their students.
<p>Professional Boundaries</p> 	<ul style="list-style-type: none"> Ensure all activity and communication occurs within the scope of your role and responsibilities. 	<ul style="list-style-type: none"> Buy gifts or other items for children or young people without authorisation from a Manager and without the knowledge of parents/guardians Develop close personal relationships with children outside of teacher/student relationships.
<p>General Professionalism</p> 	<ul style="list-style-type: none"> Always consider the health, safety and welfare of children and young people Comply with the <i>Child Safe Policy</i> Be ethical, considerate, fair and honest in all dealings with children and young people Report breaches of the <i>Child Safe Code of Conduct</i> to the Child Safety Officer 	<ul style="list-style-type: none"> Be under the influence of any alcohol, illicit drugs, medication or fatigue that may affect your capacity to perform your role Permit bullying to take place between children & young people.

	<ul style="list-style-type: none"> • Be alert to risk indicators of child abuse and child grooming • Set a good example for children and young people • Respect the right, dignity and worth of every person regardless of their age, abilities, gender, religion or cultural background • Support all efforts to remove any forms of abuse in the organisation and encourage a safe and supportive service environment. 	
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Please note the following:

- All FDLC staff members must adhere to the *City of Canada Bay Council's Code of Conduct*. For more information refer to Council's website at <https://www.canadabay.nsw.gov.au/council/council-responsibilities/policies>
- Gymnastics staff have additional obligations in relation to behaviour towards children and young people under the *Gymnastics Australia Codes of Behaviour*. For more information see: https://www.gymnastics.org.au/Ga/Child_Safety/Codes_of_Behaviour.aspx
- Fitness Instructors and Trainers must also comply with obligations under *Fitness Australia's Code of Ethical Conduct*. For more information see: https://bp-fitnessaustraliaproduction.s3.amazonaws.com/uploads/uploaded_file/file/483769/Code_of_Ethical_Conduct_v2.pdf

APPENDIX B

REGISTRATION REQUIREMENTS TO WORK WITH CHILDREN

NSW Working with Children Check (WWCC)

In NSW, the WWCC is a prerequisite for paid and unpaid child-related work for RLS NSW.⁹

There are specified exemptions from the WWCC, including but not limited to the following categories:

- Under 18 years of age
- You are a co-worker or supervisor of a worker who is under 18
- You work in the NSW or Australian Federal Police forces
- You are visiting from interstate and working with children for less than 30 days
- Close relatives volunteering at their children's usual school and extra-curricular activities unless the person is providing personal care for a child with disability, participating in a formal mentoring program, or attends an overnight camp for kids.
- You work occasionally, and work with children as an incidental part of your role for a short period of time, for example a guest speaker at a school

The WWCC registration lasts for five years and can be renewed 3 months before its expiry.

NOTE: It is illegal to do child-related work after a WWCC card has expired unless a renewal has been registered or an exemption is qualified for.

⁹ Refer to *Child Protection (Working with Children) Act 2012* (NSW).