



## AFL Central Victoria Safeguarding Children and Young People Policy

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## 1. PURPOSE

This Safeguarding Children and Young People Policy (**Policy**) outlines how AFL Central Victoria Commission will deliver on its commitments to safeguarding Children and Young People involved in AFL Central Victoria activities, programs, services and facilities. This Policy also sets out the behaviours required of AFL Central Victoria People towards and in the presence of Children and Young People. AFL Central Victoria People are required to abide by the behaviour standards set out in this Policy (including by complying with appropriate measures to address risks) and report any behaviours that do not comply with it.

The purpose of this Policy is to:

1. Provide a clear statement to AFL Central Victoria People forbidding Child Abuse.
2. Prevent Child Abuse occurring within AFL Central Victoria.
3. Work towards an organisational culture of child safety within AFL Central Victoria.
4. Ensure that all AFL Central Victoria People are aware of their responsibilities for identifying possible Child Abuse and for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs.
5. Provide guidance to AFL Central Victoria People as to action that should be taken where they suspect any Child Abuse within or outside of AFL Central Victoria.
6. Provide assurance that any and all suspected Child Abuse will be reported and investigated as appropriate.

Failure by AFL Central Victoria People to comply with this Policy may result in disciplinary action. Such disciplinary action may, depending on the seriousness of the misconduct, include suspension while matters are investigated and/or dismissal. In addition to any internal disciplinary proceedings, AFL Central Victoria will report to the police all instances in which a breach of the law has or may have occurred.

There may be exceptional situations where this Policy does not apply, for example, in an emergency situation. However, it is crucial that, where possible, AFL Central Victoria People seek authorisation from AFL Central Victoria senior management prior to taking action that contravenes this Policy or advise AFL Central Victoria senior management as soon as possible after any incident in which this Policy has not been followed.

## 2. DEFINITIONS

For the purpose of this Policy and unless the context otherwise requires (or if State and Territory legislation differs in definition requiring a higher standard) the following definitions apply:

Term	Definition
<b>AFL Central Victoria People</b>	<p>The following persons associated with AFL Central Victoria:</p> <ul style="list-style-type: none"> <li>• All employees (including casual); and</li> <li>• All directly engaged volunteers (including Committee members and delegates) and contractors / consultants who are engaged to provide services to AFL Central Victoria that involve an interaction with Children or Young People.</li> </ul>
<b>Bullying</b>	<p>Bullying involves the inappropriate use of power by one or more persons over another less powerful person and is generally an act that is repeated over time. Bullying has been described by researchers as taking many forms which are often interrelated, and may include:</p> <ul style="list-style-type: none"> <li>• <i>Verbal</i> (name calling, put downs, threats);</li> <li>• <i>Physical</i> (hitting, punching, kicking, scratching, tripping, spitting);</li> <li>• <i>Social</i> (ignoring, excluding, ostracising, alienating); and/or</li> <li>• <i>Psychological</i> (spreading rumours, stalking, dirty looks, hiding or damaging possessions).</li> </ul>
<b>Children and Young People</b>	<p>A person under the age of eighteen years. Child or Young Person shall mean a single person falling within the definition of Children and Young People.</p>
<b>Child Abuse</b>	<p>Child abuse includes all forms of Physical Abuse, Emotional or Psychological Abuse, Sexual Abuse, Sexual Exploitation, Neglect or negligent treatment, Grooming, commercial (e.g. for financial gain) exploitation, harassing behaviour, such as Bullying or other exploitation of a Child or Young Person and includes any actions that results in actual or potential Harm to a Child or Young Person. Child abuse can be a single incident, but usually takes place over time.</p>
<b>Code of Conduct</b>	<p>The <i>AFL Central Victoria Safeguarding Children and Young People Code of Conduct</i> outlines what is, and what is not, acceptable behaviour or practice when working with or engaging with Children and Young People as further detailed in this Policy.</p>
<b>Emotional or Psychological Abuse</b>	<p>Emotional or psychological abuse occurs when a Child or Young Person does not receive the love, affection or attention they need for healthy emotional, psychological and social development. Such abuse may involve repeated rejection</p>

Term	Definition
	<p>or threats to a Child or Young Person. Constant criticism, teasing, ignoring, threatening, yelling, scapegoating, ridicule and rejection or continual coldness are all examples of emotional abuse. These behaviours continue to an extent that results in significant damage to the Child's or Young Person's physical, intellectual or emotional wellbeing and development.</p>
<b>Family Violence</b>	<p>Family violence occurs when Children or Young People are forced to live with violence between adults in their home.</p> <p>It is violence between members of a family, or extended family, or those fulfilling the role of family in a Child or Young Person's life. It can include witnessing violence or the consequences of violence. Exposure to family violence places Children and Young People at increased risk of physical injury and Harm, and has a significant impact on their wellbeing and development.</p>
<b>Grooming</b>	<p>Grooming is a term used to describe activities by which a perpetrator of abuse builds a relationship with a Child or Young Person, with a view to physically abusing them. There is no set pattern in relation to the grooming of Children or Young People. For some perpetrators, there will be a lengthy period of time before the Physical Abuse begins. The Child or Young Person may be given special attention and, what starts as an apparently normal display of affection, such as cuddling, can develop into sexual touching or masturbation and then into more serious Sexual Abuse. Other perpetrators may draw a Child or Young Person in and abuse them relatively quickly. Grooming can take place in any setting where a relationship is formed, such as in the context of leisure, music, sports and religious activities, in internet chatrooms, in social media or by other technological channels.</p>
<b>Harm</b>	<p>Harm to a Child or Young Person is any detrimental effect of a significant nature on the Child's or Young Person's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by:</p> <ul style="list-style-type: none"> <li>• Emotional or Psychological Abuse, Physical Abuse or Neglect;</li> <li>• Sexual Abuse;</li> <li>• a single act, omission or circumstance; and</li> <li>• a series or combination of acts, omissions or circumstances.</li> </ul>
<b>Neglect</b>	<p>Neglect is the persistent failure or deliberate denial to provide a Child or Young Person with the basic necessities of life. Such neglect includes the failure to provide adequate food, clothing, shelter, adequate supervision, clean water or medical attention to the extent that the Child's or Young Person's health and</p>

Term	Definition
	development is, or is likely to be, significantly Harmed. Categories of neglect include physical neglect, medical neglect, abandonment or desertion, emotional neglect and educational neglect.
<b>Physical Abuse</b>	Physical abuse occurs when a person subjects a Child or Young Person to non-accidental physically aggressive acts. The abuser may inflict an injury intentionally or inadvertently as a result of physical punishment or the aggressive treatment of a Child or Young Person. Physically abusive behaviour includes (but is not limited to) shoving, hitting, slapping, shaking, throwing, punching, biting, burning, kicking and excessive and physically harmful over-training. It also includes giving Children or Young People harmful substances such as drugs, alcohol or poison. Certain types of punishment, whilst not causing injury, can also be considered physical abuse if they place a Child or Young Person at risk of being hurt.
<b>Sexual Abuse</b>	Sexual abuse is any act which exposes a Child or Young Person to, or involves a Child or Young Person in, sexual processes beyond their understanding or contrary to accepted community standards. Perpetrators of sexual abuse take advantage of their power, authority or position over the Child or Young Person for their own benefit. It can include making sexual comments to a Child or Young Person, engaging Children or Young People to participate in sexual conversations over the internet or on social media, kissing, touching a Child's or Young Person's genitals or breasts, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object. Voyeurism, exhibitionism, and exposing a Child or Young Person to pornographic magazines, websites and videos, or involving them in pornography and Sexual Exploitation are also considered forms of sexual abuse.
<b>Sexual Exploitation</b>	Sexual exploitation occurs when a Child or Young Person is forced into sexual activities that are then recorded in some way and/or used to produce pornography. Such pornography can be in the form of actual photos or videos or published on the internet. Exploitation can also involve a Child or Young Person who is forced into prostitution.

### 3. SUPPORTING DOCUMENTS

This Policy should be read in conjunction with and is supported by the Code of Conduct and the AFL Safeguarding Children and Young People Complaints and Reporting Procedure (**Supporting Documents**). This Policy and the Code of Conduct are available on AFL Central Victoria's website at: [www.aflcentralvictoria.com.au](http://www.aflcentralvictoria.com.au). The AFL Safeguarding Children and Young People Complaints and Reporting Procedure is available on the Policies page of the AFL website at: <https://www.afl.com.au/policies>.

#### **4. SCOPE**

This Policy applies to AFL Central Victoria and all AFL Central Victoria People.

In short, this means that this Policy applies to AFL Central Victoria, AFL Central Victoria's employees, directly engaged volunteers and contractors/consultants (including Committee members and their delegates), who are engaged to provide services to AFL Central Victoria that involve an interaction with Children or Young People.

#### **5. AFL CENTRAL VICTORIA'S COMMITMENTS TO SAFEGUARDING CHILDREN AND YOUNG PEOPLE**

All Children and Young People, regardless of their gender, race, religious beliefs, age, disability, sexual orientation, or family or social background, have equal rights to protection from Child Abuse. AFL Central Victoria is committed to promoting and protecting the safety and wellbeing of all Children and Young People in our care who access AFL Central Victoria activities, programs, services or facilities including by fostering a culture in which Children and Young People feel safe.

As part of AFL Central Victoria's commitment to the safeguarding of Children and Young People, AFL Central Victoria commits to the following:

- AFL Central Victoria has zero tolerance for Child Abuse.
- AFL Central Victoria will seek to provide an environment in which all Children and Young People feel supported and respected.
- AFL Central Victoria will consider the opinions of Children and Young People and use their opinions to inform the development of policies and procedures in relation to the protection of Children and Young People.
- In the event a concern or allegation is raised in relation to Child Abuse or any other inappropriate behaviour towards a Child or Young Person that has occurred while a Child or Young Person is under AFL Central Victoria's care, AFL Central Victoria will ensure it is treated seriously, in a culturally sensitive manner and fully investigated in accordance with this Policy, the Supporting Documents, any other related policies or procedures and relevant legislation.

#### **6. RESPONSIBILITIES WITHIN AFL CENTRAL VICTORIA**

Child protection is a shared responsibility between all AFL Central Victoria People. All AFL Central Victoria People are responsible for the care and protection of the Children and Young People in our care and for reporting information about suspected Child Abuse. All AFL Central Victoria People must ensure that they understand their responsibilities in respect of the protection of Children and Young People as set out in this Policy.

#### **7. RECRUITMENT AND PRE-EMPLOYMENT SCREENING**

AFL Central Victoria is committed to implementing recruitment and screening practices that prioritise the safeguarding of Children and Young People from Child Abuse. AFL Central Victoria recruitment and screening practices must identify the most suitable people for positions who share AFL Central Victoria's commitment to protecting Children and Young People. AFL Central Victoria requires all AFL Central Victoria People to pass through

its recruitment and screening processes prior to commencing their engagement with AFL Central Victoria. AFL Central Victoria's recruitment and screening practices include:

- clear position descriptions are provided that state relevant safeguarding requirements;
- communication of this Policy and the commitments described to potential applicants for positions;
- holding face-to-face interviews, which include safeguarding-related questions;
- undertaking two professional reference checks for all potential employees and one suitable reference checks for volunteer positions;
- undertaking the relevant screening checks (specific to the role), which may include identity, criminal record, Working With Children Checks and qualification checks;
- as soon as reasonably practicable following engagement, a requirement that AFL Central Victoria People review and acknowledge their understanding of this Policy; and
- once engaged, a requirement that all new AFL Central Victoria People participate in an induction program, which will provide them with further information about our commitment to safeguarding Children and Young People.

AFL Central Victoria requires AFL Central Victoria People to disclose convictions or charges affecting their suitability to engage with Children and Young People to AFL Central Victoria senior management and reviews police checks and Working With Children Checks on a regular, ongoing basis.

## **8. KEY REQUIREMENTS**

This Policy addresses the major areas where interaction occurs with the Children and Young People who take part in any AFL Central Victoria activities, programs, services or facilities. This Policy also imposes an obligation on AFL Central Victoria People who organise such activities, programs, services or facilities to identify where risks to safeguarding of Children and Young People may arise and adopt control measures to properly manage those risks (see further at section 9) of this Policy.

### **8.1. Sexual Misconduct**

Under no circumstances is any form of 'sexual behaviour' to occur with, or in the presence of, Children or Young People participating in any AFL Central Victoria activities, programs, services or facilities. Engaging in sexual behavior, either by AFL Central Victoria People involved in the delivery of such activities, programs, services or facilities, or persons participating in such activities (whether they be Children or Young People or older), is prohibited, even if the young person(s) involved may be above the legal age of consent.

'Sexual behaviour' needs to be interpreted widely, and encompasses all actions that would reasonably be considered sexual in nature, including but not limited to:

- 'contact behaviour', such as sexual intercourse, kissing, fondling, sexual penetration or exploiting a child through prostitution; and
- 'non-contact behaviour', such as flirting, sexual innuendo, inappropriate text messaging, inappropriate photography or exposure to pornography or nudity.



## **8.2. Grooming**

Although Children and Young People can be vulnerable to all types of abuse in sport, the sporting sector needs to be particularly aware of the potential for Grooming of Children and Young People in and around sporting activities. Grooming includes behaviours used to prepare a Child or Young Person with the intention of sexually abusing them. Some common Grooming strategies described in past sporting abuse cases (as reported to the Royal Commission into Institutional Responses to Child Sexual Abuse) include:

- coaching relationships – perpetrators can exploit their power and authority over Children and Young People through the private and exclusive coach or instructor relationship;
- inappropriate activity and adult material – many survivors of child sexual abuse in sport and recreation settings report that alcohol and other enticements were used by perpetrators as a form of Grooming;
- erosion of interpersonal boundaries – coaches can shift the interpersonal boundaries from the acceptable, for example, legitimate touching to correct a technique, to the inappropriate;
- targeting vulnerability – research indicates that young athletes who are experiencing difficulties in their home life can be particular targets for perpetrators. Many survivors describe family conflict, family violence or family break-up at the time of the abuse.

Perpetrators will seek to build a trusting relationship with a Child, Young Person and/or their family and/or act to isolate the Child or Young Person to abuse them.

AFL Central Victoria People are strictly prohibited from engaging in any conduct that may reasonably be considered to be of the nature of Grooming or in any way exploitative of the power imbalance that may exist in relationships with Children and Young People.

## **8.3. Positive Guidance**

AFL Central Victoria strives to ensure that Children and Young People participating in any AFL Central Victoria activities, programs, services or facilities are aware of the acceptable limits of their behaviour so that we can provide a positive experience for all participants.

Children and Young People are to be given access to relevant information to assist them in their involvement.

However, there are times when AFL Central Victoria People may be required to use appropriate techniques and behaviour management strategies, to discourage, prevent or discipline particular behaviour, to ensure:

- an effective and positive environment; and
- the safety and/or wellbeing of Children and Young People or AFL Central Victoria People.

AFL Central Victoria People are required to use behaviour management strategies that are fair, respectful and appropriate to the developmental stage of the Children or Young People involved. The Child or Young Person needs to be provided with clear directions and given an opportunity to redirect any misbehaviour in a positive manner.

Under no circumstances are AFL Central Victoria People to take disciplinary action involving physical punishment

or any form of treatment that could reasonably be considered as degrading, cruel, frightening or humiliating. Please refer to section 8.12 of this Policy for further information on when a AFL Central Victoria Person may make physical contact with a Child or Young Person when carrying out a behaviour management strategy.

#### **8.4. Promoting equity and diversity**

All AFL Central Victoria People must ensure that their approach and interactions with Children and Young People are sensitive, respectful and inclusive of all backgrounds and abilities. In particular AFL Central Victoria People are expected to:

- promote the cultural safety, participation and empowerment of Indigenous (Aboriginal and Torres Strait Islander) Children and Young People (for example, by never questioning an Indigenous child's self-identification);
- promote the cultural safety, participation and empowerment of Children and Young People with culturally and/or linguistically diverse backgrounds (for example, by having a zero tolerance of discrimination); and
- promote the safety, participation and empowerment of Children and Young People with a disability (for example, during personal care activities).

#### **8.5. Adhering to professional role boundaries**

Interactions between AFL Central Victoria People and Children and Young People should be limited to interactions directly associated with AFL Central Victoria activities, programs, services or facilities and AFL Central Victoria People should not act outside the confines of their duties (as specified in their position description, the activity description or similar documents formulated in advance).

Without express authorisation from AFL Central Victoria senior management, all AFL Central Victoria People **should not:**

- provide unauthorised transportation, for example, giving Children or Young People lifts in their car to an activity without consent from a parent or guardian (see section 8.16 below);
- engage in activities with Children or Young People who are participants in or members of our programs or organisation outside AFL Central Victoria activities, programs or services;
- provide support to a Child or Young Person, or their family, unrelated to AFL Central Victoria activities, programs or services; for example, tutoring or financial support;
- seek contact with Children or Young People (or former participants) outside AFL Central Victoria programs, activities or services, including through social media;
- where there is no existing social, personal or family relationship prior to engaging in AFL Central Victoria services, accept an invitation to attend any private social function at the request of a Child or Young Person who has participated, or is participating, in any AFL Central Victoria program, activity or service – or at the request of their family (for example, graduation ceremony);
- develop any 'special' relationships with Children or Young People that could be seen as favouritism, such as the offering of gifts, special treatment or singling specific Children or Young People out, or being secretive with

relationships; or

- engage in open discussions of a mature or adult nature with or in the presence of Children or Young People.

If a AFL Central Victoria Person's position description or similar document does not expressly grant that AFL Central Victoria Person the right to do any of the above, such authorisation may not be inferred and instead AFL Central Victoria Person must seek express authorisation from their AFL Central Victoria manager or person in authority to do any of the above.

Any AFL Central Victoria Person that becomes aware of a situation in which a Child or Young Person requires assistance that is beyond the confines of that person's role, or beyond the scope of usual services, they should at the earliest opportunity:

- contact the Child or Young Person's parent or guardian to discuss, and/or
- seek advice from their nominated AFL Central Victoria manager or person in authority.

### **8.6. Uniform**

AFL Central Victoria People should only wear AFL Central Victoria uniform (where uniform has been provided) or use any AFL Central Victoria accreditation, pass or badge while involved in delivering a service associated with AFL Central Victoria or as required by AFL Central Victoria, such as when representing AFL Central Victoria at designated functions, or travelling to and from work.

### **8.7. Use of language and tone of voice**

AFL Central Victoria People should use language and tone of voice in the presence of Children and Young People that:

- provides clear direction, boosts their confidence and encourages and affirms them;
- is not harmful to Children or Young People;
- does not include language that is:
  - discriminatory, racist or sexist;
  - derogatory, belittling or negative, for example, by calling a child a 'loser' or telling them they are 'too fat';
  - intended to threaten or frighten; or
  - profane or sexual in nature.

### **8.8. Supervision**

AFL Central Victoria People are responsible for supervising Children and Young People participating in an AFL Central Victoria program, activity or service to ensure those participants:

- engage positively with our program or activity;
- behave appropriately toward one another; and
- are in a safe environment and are protected from external threats.

AFL Central Victoria People are required to avoid one-to-one unsupervised situations with Children and Young People participating in AFL Central Victoria program, activity or service and, to the extent possible, conduct all activities and/or discussions with Children or Young People in view of other adults.

### **8.9. Use of electronic and online communications**

Where possible, all email, text messages and other forms of messages sent to a Child or Young Person should be copied to their parent or guardian.

Where a parent is **not included** in a communication between an AFL Central Victoria Person and a Child or Young Person, AFL Central Victoria Person must:

- restrict such communication to issues directly associated with delivering AFL Central Victoria program, activity or service, such as advising that a scheduled event is cancelled;
- limit the personal or social content in such communication to what is required to convey the service-related message in a polite, friendly manner. In particular, the communication must not contain anything that a reasonable observer could view as being of a suggestive or sexual nature;
- not request (or accept a request) to be “friends”, “follow” or communicate with Children or Young People using a personal social media account including, but not limited to, Facebook, Instagram, Twitter, Snapchat, Internet chat rooms or similar forums, game sites or instant messaging;
- not use such communication to promote unauthorised ‘social’ activity or to arrange unauthorised contact; and
- not request a Child or Young Person to keep a communication a secret from their parent or guardian, nor keep the communication a secret from AFL Central Victoria Person’s manager or person in authority.

AFL Central Victoria People are required to report to AFL Central Victoria senior management if they become aware of any Children or Young People who may have been placed at risk of abuse or exploitation via social networking sites, gaming sites or through web searches, or inappropriate email communication.

### **8.10. Giving gifts**

AFL Central Victoria People may only give a gift to a Child or Young Person engaged in an AFL Central Victoria program, activity or service when:

- the AFL Central Victoria Person’s supervisor or manager has provided their consent being satisfied that the giving of the gift is appropriate and proportionate in the circumstances; and
- parents/guardians are made aware of any gift given.

### **8.11. Photographs or filming of children and young people**

Subject to any applicable terms of entry of a venue, under this Policy:

- Children and Young People are to be photographed or filmed while involved in an AFL Central Victoria program, activity or service only if:
  - consent is obtained from the Child’s or Young Person’s parent or guardian;
  - the Child or Young Person consents to being photographed or filmed;
  - the context is directly related to participation in the program, activity or service;
  - the Child or Young Person is appropriately dressed and posed; and
  - the image is taken in the presence of other AFL Central Victoria People where possible.

- If a Child or Young Person does not wish to be photographed or filmed or a Child's or Young Person's parent or guardian has not provided permission for the Child or Young Person to be photographed or filmed, the Child or Young Person is not to be singled out or made to feel purposely excluded.
- Images are not to be distributed (including as an attachment to an email) to anyone other than the Child or Young Person photographed without AFL Central Victoria senior management's knowledge and approval.
- Photographs and films are not to be taken in the presence of or whilst Children or Young People are getting dressed.
- Images are to be stored in a manner that prevents unauthorised access.
- AFL Central Victoria People must comply with applicable privacy laws including *Privacy Act 1988* (Cth) in relation to holding and disclosing images and any other personal information. In particular, AFL Central Victoria People should inform a Child's or Young Person's parent or guardian about the nature of the use of the image(s) as well as how the image(s) will be stored and how the image(s) can be accessed by the parent or guardian.

#### **8.12. Physical contact with Children and Young People**

Any physical contact with Children and Young People must be appropriate to the delivery of the program, activity or service, such as assisting with skill learning, and based on the needs of the Child or Young Person.

Under no circumstances should any AFL Central Victoria People have contact with Children or Young People participating in our program or activity that:

- involves touching of:
  - genitals;
  - buttocks; or
  - the breast area,
 other than as part of delivering medical or allied health services by a medical professional or in the process of administering first aid;
- would appear to a reasonable observer to have a sexual connotation;
- is intended to cause pain or distress to the Child or Young Person (e.g. physical punishment);
- is overly physical (e.g. wrestling, horseplay, tickling or other roughhousing);
- is unnecessary (e.g. assisting with toileting when a child does not require assistance);
- is initiated against the wishes of the Child or Young Person, except if such contact may be necessary to prevent injury to the Child or Young Person or to others, in which case:
  - physical restraint should be a last resort;
  - the level of force used must be appropriate to the specific circumstances, and aimed solely at restraining the Child or Young Person to prevent harm to themselves or others; and
  - the incident must be reported to AFL Central Victoria senior management and the Child or Young Person's parent or guardian as soon as possible.

All AFL Central Victoria People are required to report to AFL Central Victoria senior management as soon as

possible any physical contact initiated by a Child or Young Person (whether directed to another Child or Young Person, to an AFL Central Victoria Person or any other person) that is sexual and/or inappropriate, for example, acts of physical aggression, to enable the situation to be managed in the interests of the safety of the Child or Young Person, AFL Central Victoria People and any other participants.

### **8.13. Overnight stays and sleeping arrangements**

Overnight stays are to occur only within or part of a formal program, activity or service. Written authorisation of the parent or guardian of each Child and Young Person involved must be obtained including medical forms. Practices and behaviour by all AFL Central Victoria People during an overnight stay with Children and Young People must be consistent with the practices and behaviour expected during delivery of AFL Central Victoria programs, activities or services at all other times.

Standards of conduct that must be observed by AFL Central Victoria People during an overnight stay include:

- minimum of two adults on any overnight stay with Children or Young People present. If an exemption is required, written permission from AFL Central Victoria senior management and each parent or guardian must be obtained in advance;
- providing Children and Young People with privacy when bathing and dressing;
- observing appropriate dress standards when Children and Young People are present (e.g. no exposure to adult nudity);
- not allowing Children or Young People to be exposed to pornographic material (e.g. through movies, television, the Internet or magazines);
- not leaving Children or Young People under the supervision or protection of other Children or Young People or unauthorised persons such as hotel staff or friends;
- not allowing sleeping arrangements that may compromise the safety of Children and Young People such as unsupervised sleeping arrangements, or an adult sleeping in the same bed as a Child or Young Person;
- the exercisable right of Children and Young People to contact their parents, guardians or others if they feel unsafe, uncomfortable or distressed during the stay; and
- ensuring an appropriate gender balance of adult supervisors is present if male and female Children and Young People are participating in the overnight stay (e.g. female supervisors available if female Children or Young People are involved and vice versa).

### **8.14. Change room arrangements**

AFL Central Victoria People are required to supervise Children and Young People in change rooms while balancing that requirement with a Child or Young Person's right to privacy. In addition:

- AFL Central Victoria People should avoid one-to-one situations with a Child or Young Person in a change room area;
- AFL Central Victoria People should avoid being present in a change room area with a Child or Young Person of the opposite sex whilst they are changing;

- AFL Central Victoria People are not permitted to use the change room area to undress or dress, while Children and Young People are present;
- AFL Central Victoria People need to ensure adequate supervision in 'public' change rooms when they are used, providing the level of supervision required for preventing abuse by members of the public, adult users, or general misbehaviour, while also respecting a Child's or Young Person's privacy; and
- phones, cameras and recording devices are not to be used in changing rooms and in particular whilst Children and Young People are getting dressed.

#### **8.15. Use, possession or supply of alcohol or drugs**

Whilst supervising Children or Young People, AFL Central Victoria People must not:

- use, possess or be under the influence of an illegal drug;
- use or be under the influence of alcohol;
- be incapacitated by any other legal drug such as prescription or over-the-counter drugs; or
- supply alcohol or drugs (including tobacco) to Children or Young People.

Use of legal drugs, other than alcohol and tobacco, is permitted, provided such use does not interfere with AFL Central Victoria Person's ability to care for Children and Young People involved in our sport.

#### **8.16. Transporting children**

AFL Central Victoria acknowledges that from time to time there are valid reasons for transporting Children and Young People. Children and Young People are to be transported only:

- in circumstances that are directly related to the delivery of an AFL Central Victoria program, activity or service; and
- with prior authorisation from AFL Central Victoria senior management and from the Child or Young Person's parent or guardian.

It is recommended that the Child or Young Person being transported sits in the back seat of the car and expected timelines of travel are to be communicated to the parent or guardian and management.

### **9. RISK MANAGEMENT**

AFL Central Victoria will prioritise the safety of Children and Young People in its overall risk management approach. An AFL Central Victoria Safeguarding Children and Young People Risk Assessment (**Risk Assessment**) should be undertaken in advance of the provision of any AFL Central Victoria activities, programs or services involving Children or Young People. The Risk Assessment must identify potential risks to the safety of Children and Young People and the proposed control measures to be adopted to manage those risks. The Risk Assessment must be prepared by or submitted for approval to AFL Central Victoria's designated child safety coordinator in advance of the relevant activity, program or service being undertaken. A sample Risk Assessment is contained at Appendix B.

For ongoing AFL Central Victoria activities, programs and services, an approved Risk Assessment may be used on the recurrence of such AFL Central Victoria activities, programs and services so long as it is periodically reviewed at least annually or more frequently when any substantive change occurs.

## 10. REPORTING OBLIGATIONS

If a Child or Young Person is at **imminent risk of harm or in immediate danger**, all AFL Central Victoria People are required to **report the situation directly to the Police - CALL '000' (within Australia)**.

AFL Central Victoria People are required to **immediately** report:

- any instance of any AFL Central Victoria People breaching this Policy or the Code of Conduct;
- any instances, allegations or disclosures of Child Abuse or other inappropriate conduct such as Grooming or Bullying that they become aware of, or any concerns that they develop in relation to these matters (whether by a source internal or external to AFL Central Victoria, including a family member or guardian of the Child or Young Person).

**Reports must be submitted in accordance with the AFL Safeguarding Children and Young People Complaints and Reporting Procedure available on the Policies page of the AFL website at: <https://www.afl.com.au/policies>.**

## 11. INVESTIGATING

If an appropriate child protection service, the police or the AFL Integrity & Security Department investigate a report made on the AFL's online reporting platform, all AFL Central Victoria People must co-operate fully with the investigation.

## 12. PRIVACY

Protecting personal information is fundamental to AFL Central Victoria. AFL Central Victoria will comply with all privacy laws (including the *Privacy Act 1988* (Cth) and the Australian Privacy Principles) in handling any personal information as required by this Policy. All personal information collected or recorded by AFL Central Victoria in relation to the safety of Children and Young People will be treated seriously and AFL Central Victoria will respect the privacy of the individuals involved.

## 13. COMMUNICATION

AFL Central Victoria communicates this Policy to all AFL Central Victoria People. AFL Central Victoria involves AFL Central Victoria People in reviews of this Policy and communicates any significant alterations of this Policy to AFL Central Victoria People. AFL Central Victoria will support ongoing education and training for all AFL Central Victoria People to ensure safeguarding information is provided on an ongoing basis.

## 14. MONITORING AND REVIEW

AFL Central Victoria monitors AFL Central Victoria People's and our external providers' compliance with this Policy and the Supporting Documents. AFL Central Victoria reviews policies, procedures and practices in relation to safeguarding Children and Young People from Child Abuse on an ongoing basis.

AFL Central Victoria involves relevant stakeholders in reviews of this Policy and communicates any significant alterations of this Policy to AFL Central Victoria People. AFL Central Victoria undertakes reviews at least annually to identify and document potential risks to Children or Young People associated with the delivery of our activities,



program, services and facilities. AFL Central Victoria will undertake reviews of this Policy as part of our ongoing compliance with safeguarding requirements.

#### **RELATED LEGISLATION**

AFL Central Victoria and all AFL Central Victoria People are also bound by legislation relevant to the protection of Children and Young People. Please refer to Appendix A for a list of relevant legislation.

**Appendix A – RELEVANT LEGISLATION**

	<b>Principle Child Protection Act</b>	<b>Mandatory Reporting</b>	<b>WWCC</b>	<b>Reportable Conduct</b>
<b>NSW</b>	Children and Young Persons (Care and Protection) Act 1998 (NSW)	Children & Young Persons (Care & Protection) Act 1998 (NSW)	Child Protection (Working with Children) Act 2012	Ombudsman Act 1974
<b>ACT</b>	Children and Young People Act 2008 (ACT)	Children & Young People Act 2008 (ACT)	Working with Vulnerable People (Background Checking) Act 2011	Reportable Conduct and Information Sharing Legislation Amendment Act 2016
<b>VIC</b>	Children, Youth and Families Act 2005 (Vic.)	Children, Youth & Families Act 2005 (Vic)	Working With Children Act 2005	Children Legislation Amendment (Reportable Conduct) Act 2017
<b>TAS</b>	Children, Young Persons and their Families Act 1997 (Tas.)	Children, Young Persons and their Families Act 1997 (Tas)	Registration to Work with Vulnerable People Act 2013	
<b>QLD</b>	Child Protection Act 1999 (Qld)	Child Protection Act 1999 (Qld)	Working with Children (Risk Management and Screening) Act 2000	
		Education (General Provisions) Act 2006 (Qld)		
<b>NT</b>	Care and Protection of Children Act 2007 (NT)	Care & Protection of Children Act 2007 (NT)	Care and Protection of Children Act 2007 (NT)	
<b>CTH</b>		Family Law Act 1975 (Cth)		
<b>Australian Employment Legislation</b>				
Australian Human Rights Commission Act 1986				
Age Discrimination Act 2004				
Disability Discrimination Act 1992				
Racial Discrimination Act 1975				
Sex Discrimination Act 1984				
Fair Work Act 2009				

Fair Work Regulations 2009

Freedom of Information Act 1982

Privacy Act 1988

Work Health and Safety Act 2011 (Cth)

Fair Work Amendment (Protecting Vulnerable Workers) Act 2017

**Appendix B – Sample Risk Assessment**

Program Details:		Staff Details:		
<b>Name:</b>	Girls Leadership Academy	<b>Program Manager:</b>	#	04xx xxx xxx
<b>Location:</b>	Melbourne, Victoria (various locations)	<b>Program Risk Officer:</b>	#	04xx xxx xxx
<b>Date:</b>	1 to 3 July 2019	<b>Head of Compliance and Risk:</b>	#	04xx xxx xxx
<b>Times:</b>	11:00am arrivals	<b>Insurance Manager:</b>	#	04xx xxx xxx

**Program Summary**

The Girls Leadership Program is a three day residential camp for 12-14 year old girls which focuses on leadership, health and wellbeing, identity and football development. The Program aims to build confidence for women in sport, in the workplace and in society. The aim is to promote physical activity in a culturally safe environments and develop community role models and provide a sense of identity.

**Participant List:**

*[Please paste the participant list in this section]*

**Itinerary:**

*[Please paste the itinerary in this section]*

Name:	Role:	First Aid:	Police Check:	WWCC:	WWCC Card Number:	Mobile Number:
<b>Staff Onsite:</b>						
#	Program Manager	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	#	04xx xxx xxx
#	Program Risk Officer	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	#	04xx xxx xxx
<b>Volunteers Onsite:</b>						
#	Assistant Coach	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	#	04xx xxx xxx

Service Provider / Contractor	Agreement in place with provider	Areas of Control	Details of activity times	Key Contact	Contact Phone	Risk Assessment and/or Safe Work Method Statement (SWMS) obtained	Certificate of Currency obtained	Working with Children Checks obtained
Punt Road Oval	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	Training Match	As per Itinerary	xxx xxx	04xx xxx xxx	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/> / NA <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>
Bounce Inc.	Y <input type="checkbox"/> / N <input checked="" type="checkbox"/>	Team Activity	As per Itinerary	xxx xxx	04xx xxx xxx	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/> / NA <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>
St John Ambulance	Y <input type="checkbox"/> / N <input checked="" type="checkbox"/>	Training Match	As per Itinerary	xxx xxx	04xx xxx xxx	Y <input type="checkbox"/> / N <input type="checkbox"/> / NA <input checked="" type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>	Y <input checked="" type="checkbox"/> / N <input type="checkbox"/>

### Safeguarding Children and Young People Risk Assessment:

The below template provides an example of potential risks, hazards and control measures, that may be applicable to AFL Central Victoria services, programs or activities. The examples are not intended to be exhaustive. Where an example is relevant to a service, program or activity that an AFL Central Victoria Person is involved in, the AFL Central Victoria Person should implement the appropriate control measures as indicated.

When managing any risk identified in relation to safeguarding Children and Young People, the following key principles should be applied:

<b>1. Child Centric</b>	To act with the best interests of Children and Young People as the primary consideration. This involves putting Children and Young People first and being focused on their protection and safety.
<b>2. Prevention</b>	The action of stopping something from happening or arising. This requires the adoption and implementation of strategies and activities that seek to reduce risk factors and enhance protective factors that are associated with child abuse and neglect.
<b>3. Transparency</b>	The lack of hidden agendas and conditions, accompanied by the availability of full information required to protect Children and Young People.

Risk Area:	Hazard(s):	Control Measures:
AFL Central Victoria <b>People:</b>		
AFL Central Victoria <b>People Skills, Knowledge, Attitude and Ability</b>	<ul style="list-style-type: none"> <li>Inadequacy of personal skills, knowledge, attitude &amp; ability to perform required duties causes harm.</li> </ul>	<ul style="list-style-type: none"> <li>Recruitment guidelines are followed and implemented, including requirements for Police Check and Working with Children Checks. These are submitted to the relevant AFL Central Victoria prior to the start of the program.</li> <li>AFL Central Victoria People selection, induction, supervising and monitoring.</li> <li>Skills assessment, feedback, coaching and support to address needs such as skills deficits, stress, personal support.</li> <li>Training provided through induction, training modules, tutorials, personnel meetings, operations manuals.</li> <li>Qualifications are periodically updated.</li> </ul>
<b>Participants Under 18</b>	<ul style="list-style-type: none"> <li>Vulnerability is not recognised when working alone with adults.</li> </ul>	<ul style="list-style-type: none"> <li>Clear guidelines in place for employing/engage under 18's.</li> <li>On boarding of minors is completed in conjunction with parents/guardians.</li> </ul>
AFL Central Victoria <b>People Supervision</b>	<ul style="list-style-type: none"> <li>Personnel behavior cannot be directly monitored (i.e. loan coach, camps, etc.).</li> <li>Individual personnel alone with young people.</li> <li>Inappropriate personnel behavior causes harm.</li> </ul>	<ul style="list-style-type: none"> <li>Safeguarding Children Code of Conduct and Safeguarding Children Policy is provided to AFL Central Victoria People when beginning employment/engagement.</li> <li>Code of Conduct to ensure that two AFL Central Victoria People are present / in view of each other whilst engaging with Children and Young People.</li> <li>Clear policies and procedures regarding terms of entry and access to personal space.</li> <li>A separate risk assessment must be conducted prior to any personnel working alone (if applicable) and approved by the committee.</li> <li>If working alone is permitted, monitoring, communication and emergency mechanisms will be provided.</li> <li>AFL Central Victoria People are trained to minimise risk and are able to promptly respond to risks. Any risky behavior in the program is to be dealt with by the Program Manager.</li> </ul>
AFL Central Victoria <b>People Support</b>	<ul style="list-style-type: none"> <li>Workplace stresses negatively impacting on AFL Central Victoria People performance.</li> </ul>	<ul style="list-style-type: none"> <li>AFL Central Victoria People are provided opportunities for de-briefing.</li> </ul>

Risk Area:	Hazard(s):	Control Measures:
<b>External Agency Providers / Contractors</b>	<ul style="list-style-type: none"> <li>• Unsuitable external provider: lack of Working with Children Checks, police, reference checks, qualifications.</li> <li>• External personnel unfamiliar with AFL Central Victoria procedures and expectations of behavior with Children and Young People.</li> <li>• High risk and/or specialized tasks.</li> </ul>	<ul style="list-style-type: none"> <li>• Contractor agreed scope of works and contracts signed prior to commencing work.</li> <li>• A risk assessment is conducted by the contractor prior to commencing work.</li> <li>• Supervision of works and contractors are in place.</li> <li>• Sign in register maintained.</li> <li>• Request Working with Children Checks.</li> </ul>
<b>Facility Hire Groups</b>	<ul style="list-style-type: none"> <li>• Unsuitable hire group: lack of WWCC, police, reference checks.</li> <li>• Hire group unfamiliar with AFL Central Victoria procedures and expectations about behavior of group.</li> </ul>	<ul style="list-style-type: none"> <li>• Facility Hire agreement in place prior to hire commencing.</li> <li>• Hire group abide by conditions of use of facility.</li> <li>• Sign in register maintained.</li> <li>• Supervision of hire group in place.</li> <li>• Spot check patrols in place.</li> <li>• Request and obtain valid Working with Children Checks.</li> </ul>
<b>Facility:</b>		
<b>Visibility</b>	<ul style="list-style-type: none"> <li>• Remote or seldom-used areas.</li> <li>• Poor visibility into all areas.</li> </ul>	<ul style="list-style-type: none"> <li>• Multiple staff members in the same room.</li> <li>• Safeguarding Children and Young People policies and procedures in place.</li> </ul>
<b>Security and Access</b>	<ul style="list-style-type: none"> <li>• Unauthorised persons entering the facility.</li> <li>• Inability to restrict activities to area.</li> <li>• Inability to restrict public access to area.</li> <li>• Inability to monitor entry / exit from area.</li> </ul>	<ul style="list-style-type: none"> <li>• Facility Users abide by conditions of use of facility.</li> <li>• Additional supervision.</li> </ul>
<b>Changerooms, Toilets, Bedrooms</b>	<ul style="list-style-type: none"> <li>• Lack of appropriate privacy including separation of sexes, accessibility to the general public.</li> <li>• Lack of appropriate supervision including number and gender of AFL Central Victoria People.</li> </ul>	<ul style="list-style-type: none"> <li>• Procedures include planned toilet breaks where children go in groups.</li> <li>• Children’s buddy system enacted when unplanned toilet breaks needed.</li> <li>• Changerooms, toilets, bedrooms inspections conducted periodically and to be tailored specific to the program (as per policy).</li> </ul>
<b>External Venue</b>	<ul style="list-style-type: none"> <li>• Unsuitable external venue (see above – visibility, security and changerooms, etc.).</li> </ul>	<ul style="list-style-type: none"> <li>• Hire agreement with external venue provider in place prior to hire commencing to address risk issues.</li> <li>• Risk Assessment completed by the venue/s (if applicable).</li> </ul>
<b>Non-AFL Central Victoria People:</b>		
<b>Vulnerability</b>	<ul style="list-style-type: none"> <li>• Age, disability, social/cultural background, history of maltreatment increases the vulnerability of clients.</li> </ul>	<ul style="list-style-type: none"> <li>• Increased supervision ratios.</li> </ul>

Risk Area:	Hazard(s):	Control Measures:
		<ul style="list-style-type: none"> <li>• Appropriately experienced and qualified personnel which are mindful of the different categories of vulnerability.</li> </ul>
<b>Non-AFL Central Victoria People Behavior</b>	<ul style="list-style-type: none"> <li>• Psychological, physical and/or sexual abuse to other persons.</li> <li>• Children and Young People do not behave appropriately towards each other.</li> <li>• Theft of personal possessions, money and assets.</li> </ul>	<ul style="list-style-type: none"> <li>• Screening of applicants to identify risk behaviors.</li> <li>• AFL Central Victoria People informed of the risks.</li> <li>• Increased supervision.</li> <li>• Behavior standards are set and monitored by AFL Central Victoria People. The standards are briefed to participants at the commencement of the program.</li> <li>• Refer to policies in place which are reviewed annually.</li> </ul>
<b>Personal Care/First Aid</b>	<ul style="list-style-type: none"> <li>• Unsuitable personal care arrangements e.g. sleeping, bathing, toilet re: age/gender/disability.</li> <li>• Lack of privacy.</li> <li>• Lack of appropriate visibility.</li> </ul>	<ul style="list-style-type: none"> <li>• Personalised management plans for high need Child/Young Person.</li> <li>• Facilities and support are appropriate to needs.</li> <li>• Refer to policies in place which are reviewed annually.</li> </ul>
<b>Trauma</b>	<ul style="list-style-type: none"> <li>• Child or Young Person disclosing abuse.</li> <li>• Child or Young Person disclosing or exhibit self-harming or suicidal tendencies.</li> <li>• Child or Young Person suffering vicarious trauma.</li> </ul>	<ul style="list-style-type: none"> <li>• Safeguarding Children and Young People Policy available and communicated to all AFL Central Victoria People.</li> <li>• Safeguarding Children and Young People training completed by all personnel (induction and annually).</li> <li>• Reporting procedures for concerns are documented and implemented within AFL Central Victoria.</li> <li>• Children, Young People and families are encouraged to provide feedback regularly on service provision.</li> <li>• Monitoring and support system are implemented with Children and Young People.</li> <li>• Referral to external support agencies.</li> </ul>
<b>Supervision</b>	<ul style="list-style-type: none"> <li>• Inadequate supervision causes injury/harm.</li> </ul>	<ul style="list-style-type: none"> <li>• Assessment is conducted to ascertain supervisory requirements for any activity.</li> </ul>
<b>On-Site</b>	<ul style="list-style-type: none"> <li>• Close physical contact.</li> <li>• Frequent one on one interactions.</li> <li>• Transporting.</li> <li>• Peer supervision.</li> </ul>	<ul style="list-style-type: none"> <li>• All activities are outlined within the program and documented accordingly.</li> <li>• Activities are conducted in line with relevant policies.</li> </ul>
<b>Transport</b>	<ul style="list-style-type: none"> <li>• AFL Central Victoria People behavior cannot be directly monitored.</li> <li>• Individual AFL Central Victoria Person alone with Young People.</li> </ul>	<ul style="list-style-type: none"> <li>• Rationale agreed and consent provided.</li> <li>• Information on journey documented, communicated and monitored.</li> <li>• Refer to 'AFL Central Victoria People Supervision' section above.</li> </ul>



Risk Area:	Hazard(s):	Control Measures:
	<ul style="list-style-type: none"> <li>Inappropriate AFL Central Victoria Person behavior causes harm.</li> </ul>	
<b>Overnight Stays</b>	<ul style="list-style-type: none"> <li>Inadequate approval sign off.</li> <li>Inadequate screening of other persons who may be present e.g. family members.</li> <li>Inappropriate sleeping arrangements.</li> </ul>	<ul style="list-style-type: none"> <li>Refer to 'Facilities' above.</li> </ul>
<b>Social Media</b>	<ul style="list-style-type: none"> <li>Unacceptable use of internet enabled devices.</li> <li>Physical location of computers does not facilitate supervision.</li> <li>Lack of regulation of contact through social media.</li> </ul>	<ul style="list-style-type: none"> <li>Safeguarding Children and Young People Code of Conduct and Safeguarding Children Policy is established that sets out social media behavior requirements.</li> <li>Safeguarding Children and Young People Code of Conduct and Safeguarding Children Policy is communicated to all new AFL Central Victoria People.</li> </ul>
<b>Photography and videography</b>	<ul style="list-style-type: none"> <li>Inadequate assessment and authorization prior to photographs/videos being taken.</li> <li>Inadequate supervision of external photographers.</li> </ul>	<ul style="list-style-type: none"> <li>Parental consent sourced.</li> <li>Correct recruitment, screening and supervision of external providers followed.</li> <li>As appropriate, seek children consent (through the registration process).</li> </ul>
<b>Parent behavior</b>	<ul style="list-style-type: none"> <li>Parents do not behave appropriately.</li> <li>Children are not collected/supervised as planned.</li> </ul>	<ul style="list-style-type: none"> <li>Briefing parents/spectators on behavioral expectations.</li> <li>Be clear on any specific requirements including court orders.</li> <li>Parent Code of Conduct in place.</li> </ul>
<b>Visitor behavior</b>	<ul style="list-style-type: none"> <li>Personal injury from unforeseen violence and aggression from persons.</li> </ul>	<ul style="list-style-type: none"> <li>Emergency procedures outline lockdown procedures (plan/document obtained from the venue).</li> <li>Communication devices are on personnel at all times.</li> <li>Client agreements define responsibility for visitor behavior.</li> </ul>

Task	Name	Signature	Date	Time
Risk Assessment Completed by:				
Risk Assessment Reviewed by Committee:				