



SAFEGUARDING CHILDREN POLICY

CONTENTS

Contents	1
1. PURPOSE.....	1
2. SCOPE	2
3. COMMITMENTS TO THE SAFEGUARDING OF CHILDREN AND YOUNG PEOPLE	3
4. COMMUNICATION	3
5. CODE OF CONDUCT.....	3
6. RECRUITMENT	5
7. TRAINING	6
8. REPORTING AND RESPONDING TO HARM OR RISK OF HARM	6
9. REPORTING AND RESPONDING TO GENERAL COMPLAINTS OR FEEDBACK	7
10. PRIVACY	8
11. RISK MANAGEMENT.....	8
12. LEGISLATION.....	11
13. DEFINITIONS	12
14. REVIEW	13

1. PURPOSE

This Safeguarding Children Policy outlines how the Port Adelaide Football Club (PAFC) and all related entities will deliver on its commitments to safeguarding children and young people involved in Club activities, programs, services, and activities.

PAFC is committed to promoting and maintaining a culture that does not permit or tolerate harm or risk of harm to children including but not limited to child abuse, neglect, or exploitation of any kind.

This policy establishes and clearly outlines PAFC's expectations and behaviours of all workers to provide a safe environment for children and young people and sets out our approach to managing risk to children and young people that may arise through the day-to-day work of the Club.

We are committed to providing a safe environment for all children and young people. Our policy complies with the *Children and Young People (Safety) Act 2017*, the *Child Safety (Prohibited Persons) Act 2016* and aligns with the *National Principles for Child Safe Organisations*.

The purpose of this policy is to:

- Provide a clear statement that the Port Adelaide Football Club related entities have zero tolerance for child harm or risk of harm
- Prevent harm of children and young people from occurring within the PAFC
- Ensure children and young people are valued and respected
- Recognise children's rights and interests
- Build and maintain a child safe culture and environment
- Ensure all workers are aware of and comply with relevant requirements
- Safeguard children and young people against different forms of harm or risk of harm
- Maintain a culture of child safety and wellbeing within the Port Adelaide Football Club
- Provide support and protection to all staff/directors/volunteers/contractors who report incidents under this Policy
- Ensure that all workers are aware of their responsibilities for identifying possible harm or risk of harm to children, and for establishing controls and procedures for reducing the likelihood of such harm and/or detecting such harm when it occurs
- Provide assurance that confidentiality and privacy is protected within the limits of this policy.
- Provide guidance as to actions that should be taken where they suspect any child harm or at risk of harm, within or outside of the Club
- Provide assurance that all suspected child harm or risk of harm will be reported and investigated as appropriate

2. SCOPE

This policy applies to all employees, volunteers, work placement students, students, contractors and any individuals who are associated with the PAFC, who are referred to throughout the policy collectively as workers.

All workers are required to agree in writing to accept and act in accordance with the policy.

This Safeguarding Children Policy and related documents are available on our website <https://www.portadelaidefc.com.au/>, on request and is required to be accepted and acknowledged by all workers at Onboarding and Induction.

PAFC and related entities want children and young people who participate and engage with our Club to have a safe and positive experience. We value and respect children and young people, and welcome them regardless of their abilities, sex, gender, or social economic or cultural background. Bullying and harassment of any kind will not be tolerated.

3. COMMITMENTS TO THE SAFEGUARDING OF CHILDREN AND YOUNG PEOPLE

PAFC understands its responsibility for ensuring children and young people, who are in any way involved with the Club, are treated appropriately, their interests upheld, and they are protected in accordance with the law. The Club has adopted a risk management approach to ensure child protection issues are incorporated in the ongoing management of projects, programs, and business.

The PAFC recognizes the particular needs of Aboriginal and Torres Strait Islander Children and Young People, Children and Young People from culturally and/or linguistically diverse backgrounds and Children and Young People with a disability and will implement culturally appropriate practices and procedures to address those needs.

Failure 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, the Club will report to the police all instances in which a breach of the law has or is suspected to have occurred.

4. COMMUNICATION

We encourage and respect the views of children and young people, and involve them in decision making, as appropriate. We provide clear age-appropriate or developmentally appropriate explanations to children and young people including their right to safety, their right to be listened to and that they can provide feedback or make a complaint if they have a concern, to any worker or ask their parent/guardian to do this on their behalf.

5. CODE OF CONDUCT

Caring for children and young people brings additional responsibilities for workers who are responsible for promoting and protecting the safety and wellbeing of children and young people by:

- Adhering to the Club's Safeguarding Children policy at all times and taking all reasonable steps to ensure the safety and protection of children and young people
- Treating everyone including those of different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs with respect and honesty and ensure equity is upheld
- Listening and responding to the views and concerns of children, particularly if they are telling you that they or another child has been harmed and/or are worried about their safety or the safety of another



- Promoting the cultural safety, participation and empowerment of children with culturally and/or linguistically diverse backgrounds (for example by having a zero tolerance on discrimination)
- Promoting the safety, participation, and empowerment of children with a disability
- Ensuring another adult is always present or in sight when conducting one to one consulting, coaching, instruction or other activity
- Encouraging children to 'have a say' and participate in all relevant Club activities where possible, especially on issues that are important to them
- Being a positive role model to children and young people in all conduct with them
- Setting clear boundaries and maintaining appropriate behaviours with children and young people – boundaries help everyone to understand their roles
- Listening and responding appropriately to the views and concerns of children and young people
- Being alert to bullying behaviours and responding promptly and appropriately
- Reporting any suspicion of harm or risk of harm to children
- If an allegation of harm is made, ensure as quickly as possible that the child(ren) are safe
- Being alert to children and young people who have been harmed, or may be at risk of harm and reporting this quickly to the Child Abuse Report Line (13 14 78)
- If you believe a child is in immediate danger or there is another emergency, please call the Police (000) immediately

Breaches or suspected breaches of the Code of Conduct or behaviours listed above will be taken seriously and dealt with quickly, fairly, transparently, and confidentially.

All incidents of harm will follow the Reporting and responding to harm process (below). A general breach will be handled as per the Reporting and responding to general complaints process below.

Breaches or suspected breaches of the Code of Conduct should be reported (via email to people@pafc.com.au) or as soon as practicable to:

- **Chief Operating Officer**
- **PAFC Child Safe Officer**
- **General Manager - People and Culture**

Any worker who breaches the Code of Conduct will face disciplinary action and depending on severity of the breach, the worker may have their employment terminated as well as the matter being referred to the appropriate legal authorities.

6. RECRUITMENT

This Safeguarding Children Policy and related documents are provided to all workers as part of their induction and onboarding following recruitment.

PAFC is committed to implementing recruitment and screening practices that prioritise the safeguarding of Children and Young People from harm. PAFC recruitment and screening practices identify the most suitable people for positions who share the PAFC's commitment to protecting Children and Young People. PAFC requires all workers to pass through its recruitment and screening processes prior to commencing their engagement with the Club. PAFC 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 two suitable reference checks for volunteer positions.
- Undertaking the relevant screening checks (specific to the role), which may include identity, criminal record, WWCC and qualification checks.
- As soon as reasonably practicable following engagement, a requirement that PAFC workers review and acknowledge their understanding of this Policy; and
- Once engaged, a requirement that all new PAFC workers participate in an induction program, which will provide them with further information about our commitment to safeguarding Children and Young People.

All persons running the organisation (board/committee members, managers etc) and all workers over the age of 14 years, even those not working directly with children and young people, to hold a current, not prohibited WWCC issued by the Screening Unit of the Department of Human Services, provide evidence of this prior to employment and to renew every 5 years.

PAFC requires workers to disclose convictions or charges affecting their suitability to engage with Children and Young People to the People department and reviews police checks and WWCC on a regular, ongoing basis. In accordance with the ***Child Safety (Prohibited Persons) Act 2016***, PAFC is registered with the DHS Screening Unit, and we link all Working with Children Checks (WWCC). PAFC will arrange and cover the expense for WWCC for all workers.

PAFC will verify the accuracy of all WWCCs in the DHS Screening Unit portal as required by law. Further, the Club will immediately contact the Department of Human Services Screening Unit when we become aware of assessable information regarding any person involved with our Club, including any serious criminal offence, child protection information, or disciplinary or misconduct information.

7. TRAINING

We have strategies in place to supervise, train and support workers to understand our Club's child safe policy, their mandatory reporting obligations, how to build culturally safe environments and their responsibilities to create a child safe and friendly environment.

Our strategies include:

- As part of their induction, all workers must read and understand the Mandatory Reporting Information Booklet available at:
https://dhs.sa.gov.au/data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF
- All workers will complete the annual AFL accreditation training, covering Child Safe Environments.
- Specific workers who work directly with children and young people will complete RRHAN-EC mandatory notification training.

8. REPORTING AND RESPONDING TO HARM OR RISK OF HARM

PAFC aims to ensure that children and young people are safe from harm and risk of harm.

Section 17 of the Safety Act defines 'harm' to mean physical or psychological harm (whether caused by an act or omission), including harm caused by sexual, physical, mental or emotional abuse or neglect.

Mandated reporters in our Club are workers who:

- Provide services to children and young people
- Hold a management position in the Club the duties of which include direct responsibility for, or direct supervision of, the provision of those services to children and young people.

Mandated reporters have a legal obligation to notify the **Child Abuse Report Line (CARL)** on **13 14 78** as soon as practicable if they have a suspicion that a child or young person has been harmed or may be at risk of harm. Reports must be submitted on the AFL's online reporting platform in accordance with the [AFL Safeguarding Children and Young People Complaints and Reporting Procedure](#).

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

If not a mandated reporter, any person can report harm or risk of harm to a child or young person. The individual who identifies the harm or risk of harm is encouraged to make the report to authorities and can request support from another worker to do so if required.

All adult workers (even if not a mandated reporter) have a legal obligation to report child sexual abuse by another worker to the police and to protect a child from sexual abuse by another worker. Failure to meet these obligations may be considered a criminal offence.

Following a report being made to CARL or SAPOL workers must make an internal report to management.

The Club will be guided by the Department for Child Protection and/or SAPOL after a report has been made as to whether we can conduct an internal investigation.

If a worker is reported to CARL or SAPOL for causing harm or risk of harm to a child or young person, they will be removed from any role that involves working with any child or young person until authorities have concluded their investigation.

Following a report to CARL or SAPOL we will support the child or young person by:

- Referring the child, young person or their family to other appropriate services
- Continuing to provide a service to the child, young person and their family and monitor their circumstances.

9. REPORTING AND RESPONDING TO GENERAL COMPLAINTS OR FEEDBACK

Compliments, complaints, or feedback can be provided verbally to any worker or direct to the General Manager, People & Culture via email at people@pafc.com.au. We will deal with all complaints and feedback received promptly, sensitively and fairly.

We will:

- Listen to the complaint/feedback.
- If a worker receives a complaint, they must forward it to management as soon as possible.
- The person receiving the complaint will make a record of it if received verbally.
- Advise the time expected for an outcome.
- Management will respond to the complainant with an outcome in a timely manner.
- Clearly document and securely store decisions and actions taken in response to complaints and feedback.
- Make sure that procedural fairness, including confidentiality, is followed at all times.

If the child, young person or their family is not happy with the outcome from the complaints process they can contact the AFL Integrity and Security department via the AFL Portal in

accordance with the AFL Safeguarding Children & Young People Complaints and reporting procedure and the below organisations.

- Health and Community Services Complaints Commissioner 8226 8666.
- Australian Human Rights Commission Online: www.humanrights.gov.au Tel: 1300 656 419.
- South Australian Equal Opportunities Commission (for complaints relating to discrimination) Online: www.eoc.sa.gov.au Tel: 08 8207 1977.

10. PRIVACY

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

11. RISK MANAGEMENT

Identified risk	Actions to minimise risk;
Physical contact	• Any physical contact must be appropriate to the delivery of services being provided • Where physical contact is required, this is undertaken in a safe way by explaining why contact is required (for example skill development and correcting technique) and what will happen, and asking the child/young person for their permission (or their family if this is more appropriate) before proceeding • Unnecessary physical contact is not allowed
Online communications	• Cyber safety and social media guidelines are in place and provided to all workers • Appropriate supervision is provided for all online activities • Workers must not communicate with children or young people via social media
Transport of Children and young people	• Workers must not transport a child or young person unless specifically approved by parents/guardians • Parents/guardians must provide consent before transporting a child or young person • Workers must have a valid, unrestricted driver's license • Vehicles must be registered, insured and in roadworthy condition • Workers must not be alone in a vehicle with a child or young person
Supervision	• Children and young people are to be supervised by parents/guardians at all times • Another adult is always present or in sight when conducting one to one consulting, coaching, instruction or other activity



	• If child/young person not collected by parent/guardian at end of consult/class/training, two adults are to stay with child/young person until they are collected • Workers supervising Children our young people must not be under the influence of alcohol or illegal drugs.
Overnight and/or off-site activities	• Consent of parent or guardian must be given • Children and young people must be supervised by a minimum of 2 adults of the same gender as the children attending • Privacy when children or young people are bathing, toileting and dressing must be provided • Children and young people will not be left under the supervision of unauthorised persons • Sleeping arrangements will not compromise the safety of children or young people such as unsupervised sleeping arrangements, or children or young people sharing a bed or an adult sleeping in the same bed as a child or young person • In the event of billeting arrangements, host adults should have a child or young person attending the same event from the same household, and have a not prohibited WWCC • Children and young people have the right to contact their parents, or another adult, if they feel unsafe, uncomfortable, or distressed during the stay
Taking images of children and young people	• Consent of child young person and their parent/guardian is required before taking pictures and/or recording video content. • Disclosure will be made as to how the image is to be used and consent must be provided by the child, young person and parent/guardian • Images must be presented in a way that de-identifies the child or young person
Physical environment	• Maintain a risk register that is reviewed annually to ensure effectiveness • Conduct risk assessments for all activities • Ensure all equipment is in good working order
Privacy and confidentiality	• Digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties • Workers must not disclose information regarding any child or young person without written consent of the child, young person and their parent/guardian



Change room requirements	• A minimum of two adults of the same gender as the children or young people must be present • Supervision will be provided ensuring the child or young person's right to privacy • Adults must not shower or change whilst supervising or in the presents of children or young people • Phones, cameras and recording devices must not be used in change room
Behaviour standards	Under any circumstances, workers must not: • Develop any 'special or grooming' relationships with children that could be seen as favouritism (for example, the offering of gifts or special treatment for specific children) • Exhibit behaviours with children which may be construed as unnecessarily physical (for example, inappropriate sitting on laps. This may be appropriate on some occasions for example while reading a storybook to a small child in an open plan area with other staff present) • Under no circumstances put children at risk of harm (for example, by locking doors) • Do things of a personal nature that a child can do for themselves, such as toileting or changing clothes • Engage in open discussions of a mature or adult nature in the presence of children • Use inappropriate language in the presence of children • Express personal views on cultures, race or sexuality in the presence of children • Discriminate against any child, including because of culture, race, ethnicity or disability • Have contact with a child or their family outside of our Club without consent (for example, no babysitting) • Have any online contact including social media with a child or their family unless necessary

12. LEGISLATION

This policy should be read in conjunction with:

- Children and Young People (Safety) Act 2017
- Child Safety (Prohibited Persons) Act 2016
- National Principles for Child Safe Organisations
- Australian Human Rights Commission Act 1986
- Age Discrimination Act 2004
- Disability Discrimination Act 1992
- Racial Discrimination Act 1975
- Sex Discrimination Act 194
- 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

	<u>Principle Child Protection Act</u>	<u>Mandatory Reporting</u>	<u>WWCC</u>	<u>Reportable Conduct</u>
<u>NSW</u>	Children and Young Persons (Care and Protection) Act NSW	Children & Young Persons (Care of Protection) Act 1998	Child Protection (Working with Children) Act 2012	Ombudsman Act 1974
<u>ACT</u>	Children and Young People Act 2008 (ACT)	Children and Young People Act 2008 (ACT)	Working with Vulnerable People (Background Checking) Act 2011	Reporting Conduct & Information Sharing Legislation Amendment Act 2016





<u>VIC</u>	Children, Youth and Families Act 2005 (Vic.)	Children, Youth and Families Act 2005 (Vic.)	Working with Children Act 2005	Children Legislation Amendment (Reportable Conduct) Act 2017
<u>TAS</u>	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	
<u>QLD</u>	Child Protection Act 1999 (Qld)	Child Protection Act 1999 (Qld) Education (General Provisions) Act 2006 QLD	Working with Children (Risk Management & Screening) Act 2000	
<u>NT</u>	Care & Protection of Children Act 2007 (NT)	Care & Protection of Children Act 2007 (NT)	Care & Protection of Children Act 2007 (NT)	
<u>CTH</u>		Family Law Act 19675 (Cth)		

PAFC documents relating to the Policy.

- Code of Conduct
- Grievance and Dispute Management Procedure
- Whistleblower Policy
- PAFC Safeguarding Children Statement

13. DEFINITIONS

Adult means a person over the age of 18.

AFL means the Australian Football League, which is the governing body for Australian Football, which conduct Australian Football competitions throughout Australia.

Breach means a failure to do what is required by a law, an agreement, or a duty.

Bullying means the inappropriate use of power and is generally an act that is repeated over time. Bullying takes many forms including verbal, physical, social and psychological.

Child / Young Person means a person under the age of 18.

Emotional or Psychological harm occurs when a Child or Young Person does not receive the love, attraction or attention they need for healthy emotional, psychological and social development. Such abuse may involve repeated rejection 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 can result in significant damage to the Child's or Young Person's physical, intellectual or emotional wellbeing and development.

Family Violence occurs when Children or Young People are forced to live with violence between adults in their home. 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.

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.

Harm to a Child or Young person is any detrimental effect of a significant nature on the Child or Young Persons physical, psychological or emotional wellbeing. It is immaterial how the harm is caused.

PAFC means Port Adelaide Football Club.

Sexual Harm means 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.

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.

Worker means an employee, volunteer, contractor, intern, student or visitor of the Club.

14. REVIEW

We will, at a minimum, review this policy and the related procedures once every 5 years as required by the Children and Young People (Safety) Act 2017. We will also review this policy when:

- New or added risks are identified for children or young people, which may require a change in the policy or procedures



- A critical incident where a child or young person has experienced harm through involvement in the Club
- Concerns are raised by anyone involved in your Club about child safety or welfare in the Club
- Awareness or compliance to the child safe policy and/or procedures is low
- Legislative changes/requirements.

PAFC will lodge a new child safe environments compliance statement with the Department of Human Services each time we review and update this policy.

This policy will be reviewed by People and Culture five (5) years from the date of operation of this version.

Policy Risk Rating:

Level 1

Review period: minimum five (5) years

Approved

A handwritten signature in blue ink, appearing to read 'Matthew Richardson'.

Matthew Richardson

Chief Executive Officer

Port Adelaide Football Club

Date:

4 February 2025

Date Endorsed by Governance:

5/2/2025
