

ACS Child Safety and Wellbeing policy

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Introduction

The Association of Coeducational Schools (**ACS**) holds the care, safety and wellbeing of children as a central and fundamental responsibility of our school sporting association. The ACS is committed to promoting and protecting the interests and safety of children accessing the ACS' services. It also supports the rights and wellbeing of all employees and volunteers and encourages their active participation in building and maintaining a secure environment.

The purpose of the Child Safety and Wellbeing Policy is to protect children and young people in our programs from abuse or harm and ensure their wellbeing. The Child Safety and Wellbeing Policy provides clear guidelines to ensure that all who work, volunteer or partner with ACS are aware of their responsibilities for identifying and responding to concerns or allegations of child abuse or harm. It encourages a culture where issues regarding safeguarding children and young people are openly discussed. ACS are committed to best practice in child safety and promote a culture where every child is safe.

The ACS will work in direct partnership with its member schools, State Sporting Associations, contractors and external venue operators to clearly communicate, implement and adhere to the Victorian Child Safe Standards.

We have a zero-tolerance policy approach to child abuse and harm and will report all allegations of harm. The ACS is also committed to establishing a culturally safe environment, to preserve the safety of Aboriginal and Torres Strait Islander children, children from culturally and/or linguistically diverse backgrounds, children who are lesbian, gay, bisexual, trans and gender diverse, intersex, queer and asexual (LGBTIQ+), children with disabilities and children who are vulnerable and unable to live at home. The ACS value diverse and unique identities and experiences and remain committed to ensuring children who participate in its activities have a safe and happy experience. The ACS supports and respects children, personnel and participants.

Everyone working with the ACS is responsible for the care and protection of children within our care to ensure a child-safe environment is maintained at all times.

If any person believes a child is in immediate risk of abuse, telephone 000.

Purpose

ACS' Child Safety and Wellbeing Policy sets out our commitment and approach to creating and maintaining a child safe organisation where all children and young people feel safe. It also provides the policy framework for our approach to implementing the Victorian Child Safe Standards.

The aims of this Policy are to:

- prevent child abuse occurring within all the ACS Environments;
- ensure compliance with the Standards setting out the minimum requirements to be taken to keep children and young people safe;
- ensure that all parties are aware of their responsibilities for identifying possible occasions for child abuse and for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs;

- provide guidance on action that should be taken where a person suspects any child abuse or harm within all the ACS Environments; and
- provide assurance that any and all suspected abuse will be reported and fully investigated.

Scope

The Child Safety and Wellbeing Policy applies to all employees and volunteers of the ACS which includes contractors, officials, volunteers, coaches, umpires and referees, students on placement, Board/Committee members; collectively referred to as “**personnel**” throughout this policy.

The scope of the policy applies to relevant people at all times, including outside hours of ordinary work.

This policy should be read in conjunction with the Child Safe Reporting Procedure and the Child Safe Child Safe Code of Conduct.

Definitions

Term	Definition
Aboriginal and Torres Strait Islander	Includes all First Nations communities. ACS believes it is important to be respectful of how individual children, their families, carers and community refer to themselves, and use appropriate language when referring to individuals or communities.
ACS Committee of Principals	Means the Committee having management of the business of the Association.
ACS Environments	Means any physical or virtual environments made available or authorised by the ACS’ governing authority for use by a child, including: <ul style="list-style-type: none"> (a) Online ACS Environments (including email, portals and intranet systems); and (b) Other locations provided by ACS for a child’s use (including, without limitation, locations used for sports competitions).
Child	Means a person under the age of 18 years unless otherwise stated under the law applicable to the child. Collective term for “child” is “children”.
Child Abuse	An act or omission that endangers a Child’s physical or emotional health, well-being or development and can occur as a single incident or multiple incidents over time. Child abuse is defined in section 3 of the <i>Child Wellbeing and Safety Act 2005</i> (Vic) as including: <ul style="list-style-type: none"> (a) Any act committed against a child involving: <ul style="list-style-type: none"> • A sexual offence; or • An offence under section 49M(1) of the <i>Crimes Act 1958</i> (Vic) (Grooming); (b) The infliction, on a child, of: <ul style="list-style-type: none"> • Physical violence; or • Serious emotional or psychological harm; (c) Serious neglect of a child.
Child Protection	The body legislated to receive and investigate instances of Child Abuse. In Victoria this is the Department of Families, Fairness and Housing (DFFH).
Child Safe	Refers to an organisational environment that has an open and aware culture,

	understands child harm, is supported by robust child safe policies, promotes the empowerment and participation of children, identifies and manages child safety risks, and expects all stakeholders to report any allegations, disclosures or concerns for the safety and wellbeing of children. A child safe environment ensures that children and young people are culturally safe.
Child Safe Code of Conduct	<p>The document that sets the boundaries and expectations for appropriate and inappropriate behaviours between adults and children and young people in our physical and online environments.</p> <p>ACS take steps so that children and young people also know what is acceptable and what is not acceptable so that they can be clear and confident about what to expect from our personnel and how to raise concerns if they have them.</p>
CSO	<p>Child Safety Officers:</p> <ul style="list-style-type: none"> • The Executive Officer of the ACS • Current ACS President
Child Safe Standards	<p>Means the standards made under section 17(1) of the <i>Child Wellbeing and Safety Act 2005</i> (Vic), to ensure that in the operation of relevant entities:</p> <ul style="list-style-type: none"> (a) The safety of children is promoted; (b) Child abuse is prevented; and (c) Allegations of child abuse are properly responded to.
Contractor	A person or organisation that undertakes a contract to provide materials, tasks or labour to do a service or job.
Cultural Safety	Promotes the positive recognition and celebration of cultures. It is more than just the absence of racism or discrimination, and more than cultural awareness and cultural sensitivity. A culturally safe environment is socially and emotionally safe, as well as physically safe for children. It is underpinned by shared respect, shared meaning, shared knowledge and experience, and living and working together with dignity and truly listening. ¹
Disclosure	<p>Refers to a child telling someone (through words, drawings or actions) that they feel unsafe or have been harmed.</p> <p>Several types of disclosure have been identified, including purposeful telling (i.e., direct verbal means), accidental telling (i.e., third-party detection), elicited/ prompted telling (i.e., response to inquiry by a helping person), behavioural telling (i.e., behavioural, nonverbal communication; indirect verbal hints), telling purposely withheld (i.e., choice not to tell, denials) and triggered telling (i.e., in response to delayed memories).²</p>
Duty of Care	Organisations that facilitate work with children and young people have an obligation to ensure processes are in place to avoid acts or omissions that place children in circumstances that may lead to harm. If a child is abused/caused harm by an individual associated with our organisation, our organisation is presumed to have breached its duty of care unless it can prove that it took 'reasonable precautions' to prevent the abuse in question.
Directors/Heads of Sport	For the purposes of this document, Directors/Heads of Sport will refer to any employee whose role means they hold leadership responsibility for key organisational functions including recruitment, selection, supervision, program planning, risk management and program delivery.

¹ Revised from An Overview of the Victorian Child Safe Standards (November 2015) – State of Victoria, Department of Health and Human Services and A Guide for Creating a Child Safe Organisation (Version 2.0 December 2015) - Commission for Children and Young People.

² [1.-NC-Language-Guide_FINAL.pdf](#)

Mandatory Reporter	<p>Any adult who is legally required to ensure a report has been made when a concern, allegation and /or disclosure of child harm arises. A mandatory reporter may be a person who holds a particular occupation or falls under specific legislation.</p> <p>ACS requires all personnel to report all child safety concerns, allegations and disclosures.</p>
Reasonable Belief	<p>A ‘reasonable belief’ is not the same as having proof. A ‘reasonable belief’ is formed if a reasonable person in the same position would have formed the belief on the same grounds. A ‘reasonable belief’ might be formed when:</p> <ul style="list-style-type: none"> • a child states that they have been harmed • a child states that they know someone who has been harmed (sometimes the child may be talking about themselves) • someone who knows a child states that the child has been harmed • professional observations of the child’s behaviour or development leads a person to form a belief that the child has been harmed • signs of harm lead to a belief that the child has been harmed.
Reportable Conduct Scheme	<p>The Reportable Conduct Scheme requires reports made to the scheme if ACS becomes aware of an allegation of child abuse, child harm, risk of harm, serious neglect, or child related misconduct being made against a member of personnel.</p> <p>After police clearance, Reportable Conduct cases will be investigated by ACS. ACS may also seek advice from the Police, Scheme and Child Protection regarding appointing an external investigator.</p> <p>Reportable Conduct Schemes and their prescribed processes do not replace the need to report concerns, allegations, and disclosures to the Police when there are indicators that a crime may have been committed, and/or to child protection authorities where there are protective concerns for children and young people.</p>
Personnel	All personnel, committee members, volunteers, officials, coaches, umpires and referees, students on placement and contractors.
Young Person	For this policy a young person is aged between 12 and 18.
Zero tolerance	ACS does not accept or condone under any circumstances any form of Child Abuse or harm.

Commitment to Guiding principles

ACS recognises all children and young people have a right be to kept safe from harm. We are committed to always upholding this moral and legal obligation. All allegations and safety concerns will be treated seriously and consistently in line with our policies and procedures.

This Policy is based on the following principles:

- the ACS has a zero tolerance for child abuse;
- the interests of the child are paramount;
- child safeguarding and protection is a shared responsibility;
- all children have a right to feel safe and be safe, and have equal rights to protection from abuse;

- the ACS will consider the opinions of children and young people and use their opinions to develop child safety policies and procedures;
- the ACS will take into account the diversity of all children, including (but not limited to) the needs of Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, lesbian, gay, bisexual, trans and gender diverse, intersex, queer and asexual (LGBTIQ+) children and young people, children with disabilities, and children who are vulnerable and unable to live at home, and make reasonable efforts to accommodate these matters; and
- the ACS is committed to the cultural safety of Aboriginal and Torres Strait children, and those from culturally and/or linguistically diverse backgrounds, and to providing a safe environment for children living with a disability, children who identify as lesbian, gay, bisexual, trans and gender diverse, intersex, queer, and asexual (LGBTIQ+) and children unable to live at home.

Legislation and Policy Context

ACS takes its legal responsibilities seriously, including Mandatory Reporting, Voluntary Reporting and meeting our Reportable Conduct Scheme obligations. More details can be found in our Child Safe Reporting Procedure.

ACS Child Safety policies and procedures align with the:

- United Nations Convention on the Rights of the Child
- Victorian Child Safe Standards

Victoria's Child Safe Standards

Plain language summary

1 Your organisation welcomes Aboriginal children. You support them to express their culture and to enjoy their rights. You don't allow racism.

2 Child safety is important to everyone at all levels in your organisation. You document how you find, avoid, and stop risks of child abuse or harm.

3 Your organisation supports children to know their rights to be safe from abuse, informed, and involved. You help them to talk openly and take part in decisions that affect them.

4 Your organisation tells families and the community about what you do, and how you keep children safe from harm and abuse. You help families to have a say and to take part in decisions that affect their child.

5 Your organisation understands that every child is different and has different needs. You make sure that they can get the information and help that they need.

6 Staff know what they must do to keep children safe from abuse and harm. They record, report, and share information about child safety when they should. Staff who work with children have had the background checks they need.

7 Children and their families know how to make a complaint and what happens when a complaint is made. Your staff know how to respond properly to complaints.

8 Your organisation trains and supports staff to keep children safe from abuse and harm. Your staff know the signs of child abuse and harm and what to do if there are issues of abuse and harm.

9 Your organisation makes sure children are safe when they use your services, settings, and activities. This includes when children are online.

10 Your organisation checks and improves the ways you keep children safe from abuse and harm.

11 Your organisation has written policies about how you keep children safe from abuse and harm. They are easy to understand, and all staff follow them.

For more information, contact the Commission for Children and Young People
www.ccyp.vic.gov.au

Infographic of the 11 Victorian Child Safe Standards [CCYP | Child Safe Standards](https://www.ccyp.vic.gov.au/child-safe-standards)

Key legislation

Commonwealth

- Age Discrimination Act 2004 (Cth)
- Australian Human Rights Commission Act 1986 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Family Law Act 1975 (Cth)
- Privacy Act 1988 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Sex Discrimination Act 1984 (Cth)

Victoria

- Children, Youth and Families Act 2005
- Child Wellbeing and Safety Act 2005
- Commission for Children and Young People Act 2012
- Wrongs Amendment (Organisational Child Abuse) Act 2017
- Crimes Amendment (Protection of Children) Act 2014

- Crimes Amendment (Grooming) Act 2014
- Worker Screening Act 2020
- Sex Offenders Registration Act 2004
- Crimes Act 1958
- Charter of Human Rights and Responsibilities Act 2006
- Equal Opportunity Act 2010

Roles and Responsibilities

ACS personnel will ensure that each person understands their role, responsibilities and behaviour expected in protecting children and young people from abuse, neglect or risk of harm.

This table outlines the key responsibilities for specific roles within ACS for developing and maintaining a culture of child safety and wellbeing.

Role	Responsibilities
ACS Committee of Principals	<ul style="list-style-type: none"> • Ensuring: <ul style="list-style-type: none"> ○ child safe systems and structures are in place and adequately resourced ○ child safeguarding is addressed at a strategic level ○ The ACS Child Safety and Wellbeing Policy is aligned with the Victorian Child Standards and reflects Victorian legislative requirements. ○ adequate resources are allocated to allow for the development, effective implementation, communication and continuous improvement of this policy ○ child safety is a regular agenda item at ACS Committee of Principals meetings • Approving, and reviewing at regular intervals, the Child Safety and Wellbeing Policy • Clearly articulating the ACS risk appetite with respect to child safety matters and reviewing child safe risk register items • Reviewing and responding to complaints, allegations, or concerns regarding child safety matters in conjunction with the Executive Officer • Responding to and overseeing complaints made about or referring to the EO • Supporting a culture of openness and continued improvement and accountability to keeping children and young people safe from abuse, harm and neglect • Promoting commitment to this policy and its expectations both internally and publicly.
Executive Officer	<ul style="list-style-type: none"> • Ensuring child safety considerations are foremost in organisational decision-making • Developing opportunities for regular discussion and review at all levels to support a culture of continuous improvement and accountability of keeping children and young people safe from abuse and neglect. • Ensuring: <ul style="list-style-type: none"> ○ the ACS Child Safety strategy and policies are implemented ○ all personnel are aware of relevant laws and Standards, organisational policies and procedures, reporting requirements and the organisation’s Child Safe Code of Conduct ○ all personnel are aware of the appropriate recruitment, screening and employment practice in relation to safeguarding children and young people. • Reviewing and responding to complaints, allegations, or concerns regarding child safety matters in conjunction with the Committee of Principals • Monitoring compliance with the policy via an inbuilt mechanism for ongoing monitoring and review. • Reporting to the Committee of Principals, as per ACS policies and procedures, all breaches of the ACS Child Safety and Wellbeing Policy and ensuring the appropriate

	<p>steps for addressing such breaches are taken, along with implementing required actions to mitigate against further such breaches</p> <ul style="list-style-type: none"> • Recommending to the ACS Committee of Principals: <ul style="list-style-type: none"> ○ any changes to the ACS Child Safety and Wellbeing Policy in line with relevant legislative changes or evolving practice in consultation with relevant stakeholders ○ within ACS' annual operating budget, the expenditure of necessary resources to ensure ACS can demonstrate it is meeting its stated commitment to child safety, or invest in relevant initiatives to enable it to meet this commitment
<p>Child Safety Officer</p>	<ul style="list-style-type: none"> • Making the Child Safety and Wellbeing policy publicly available via the ACS website. • Ensuring: <ul style="list-style-type: none"> ○ induction and annual child safe training is in place for all ACS personnel (including ACS Committee of Principals members) ○ all managers/directors of sport are aware of their responsibilities for ensuring their teams complete the relevant training ○ all child safety training is reviewed at least annually and is aligned to the Victorian Child Safe Standards and relevant legislative requirements ○ the Executive Officer and delegates are aware of their Reportable Conduct obligations ○ A child friendly and accessible version of the Child Safety and Wellbeing Policy is available. • Acting as the first point of contact for child safety concerns or allegations of abuse and provide support to other personnel. • Supporting personnel to report to external authorities (such as police or DFFH services), as required. • Reporting complaints, allegations or concerns to the Executive Officer or the Chair of the Committee of Principals in accordance with procedures. • Maintaining and implementing a Continuous Improvement Plan • Reviewing and updating the Child Safety and Wellbeing Policy, Child Safe Code of Conduct and Child Safe Reporting Procedure every 2 years.
<p>Human Resources</p>	<ul style="list-style-type: none"> • Ensuring: <ul style="list-style-type: none"> ○ the Child Safety and Wellbeing Policy, Child Safe Reporting Procedure and the Child Safe Code of Conduct are shared with personnel as part of onboarding processes. ○ recruitment, selection, supervision and management practices are child safe ○ adequate wellbeing supports are in place for personnel who receive disclosures and who regularly work in the area of child safety. ○ the Child Safe Officer and others who hold the Child Safeguarding portfolio have suitable training to support their role. • Embedding appropriate wording to demonstrate ACS' commitment to Child Safety into all templates and practices used for recruiting personnel • Managing: <ul style="list-style-type: none"> ○ ACS disciplinary procedures as they apply to the Victorian Child Safe Standards and relevant legislation ○ Reportable Conduct allegations with the Child Safe Officer and EO.
<p>Directors/ Heads of Sport/Managers</p>	<ul style="list-style-type: none"> • Taking a proactive role as a member of the leadership team in ensuring child safety considerations are foremost in organisational decision-making • Conducting recruitment practices in line with requirements for child related work • Providing internal leadership in relation to program delivery matters to ensure that all personnel, and partners are aware of ACS' commitment and approach to child safety • Ensuring: <ul style="list-style-type: none"> ○ all personnel understand their child safeguarding responsibilities. ○ all personnel within their teams complete relevant training, understand their child safety responsibilities and maintain relevant knowledge for the fulfilment of their role, providing additional support if required ○ all ACS programs are developed taking account of the Victorian Child Safe Standards and any relevant legislation.

	<ul style="list-style-type: none"> ○ program risk assessments are reviewed and updated annually, or more frequently as required ○ 'child safety' is a standard agenda item for all meetings ○ reporting occurs in line with legislation ● Initiating appropriate performance management and/or disciplinary actions that may be required where personnel commit any breach of the ACS Child Safety and Wellbeing Policy or Child Safe Code of Conduct.
All Personnel	<ul style="list-style-type: none"> ● Understanding the signs of child abuse, child harm and neglect and how to respond ● Maintaining a thorough understanding of the commitments and expectations of this policy, the Child Safe Code of Conduct, the Child Safe Reporting procedure and other relevant policies and procedures and legislation related to safeguarding children and young people. ● Following the Child Safe Code of Conduct when engaging with children and young people ● Ensuring: <ul style="list-style-type: none"> ○ physical and online spaces are safe and inclusive for children and young people ○ compliance with this policy ● Advocating for and promoting child rights, empowering and engaging children and young people in support of this policy. ● Completing induction and ongoing training relation to policy and procedures relevant to safeguarding children and young people. ● Supporting a culture of openness, continued improvement and accountability to children and young people by engaging in regular review and discussion of policies and practices and providing feedback to support improvement ● Seeking guidance from a manager or the Child Safe Officer if there is ever any lack of understanding regarding this policy ● Taking action to protect children and young people from all forms of abuse, harm and neglect. ● Reporting any allegations, disclosures or concerns of abuse, harm and neglect ● Maintaining a child safe culture and a culture of inclusion and safety. <p style="text-align: center; color: red;">Where a child is in immediate danger call 000</p>

Child Safety Officers

A nominated Child Safety Officer (CSO) is available to listen, discuss and clarify issues personnel face in relation to child safeguarding and child abuse. The CSO is available to assist all personnel with reporting and ensure that adequate records are maintained. Please note that individuals may still have reporting obligations, as set out in the ACS Child Safe Reporting Procedure.

Recognising child abuse and neglect

ACS is committed to ensuring that our personnel understand the forms of abuse, harm and neglect. ACS understands that child abuse often occurs more than once, referred to as cumulative harm, and that children and young people are often subject to multiple forms of child abuse, referred to as multidimensional abuse.

Our personnel will be inducted and trained to ensure they understand and can respond to the following forms of child abuse³:

³ Adapted from <https://www.vic.gov.au/child-safe-standards-definitions>

Physical abuse/harm:

Physical abuse/harm occurs when a child suffers or is likely to suffer significant harm from an injury inflicted by a child’s parent or caregiver or any other adult. The injury may be inflicted intentionally or may be the inadvertent consequence of physical punishment or physically aggressive treatment of a child. This may take the form of punching, beating, shaking or otherwise harming a child.

Emotional abuse/harm:

Emotional abuse/harm occurs when a child’s parent, caregiver or any other adult repeatedly rejects the child or uses threats to frighten the child. This may involve children:

- Being repeatedly rejected, called names or being put down
- Being frightened by threats
- Experiencing continual coldness to the extent that it significantly damages their physical, social, intellectual or emotional development
- Being exposed to family violence

Neglect:

Neglect is the failure to provide for the child’s basic needs for life to the extent that the child’s health and development are, or are likely to be, placed at risk, including:

- Food
- Clothing
- Shelter
- Medical attention
- Supervision or care

The law differentiates between three different levels of neglect:

- 'Minor' neglect is low-level neglect that is trivial or temporary.
- 'Significant' neglect is medium-level neglect that causes harm to a child that is more than trivial or temporary.
- 'Serious' neglect is the highest level of neglect. It involves the continued failure to provide a child with the basic necessities of life and can also occur if an adult fails to adequately ensure the safety of a child exposed to extremely dangerous or life-threatening situations.

Sexual abuse/harm:

Any activity with a child before the age of legal consent that is for the sexual gratification of an adult or a substantially older child. These activities include oral-genital, genital-genital, genital-rectal, hand-genital, hand-rectal, or hand-breast contact; exposure of sexual anatomy; forced viewing of sexual anatomy; and showing of pornography to a child or using a child in the production of pornography. (This definition includes criminal activity. The legal age for consensual sexual activity is 16-17 years across Australian States and Territories. It is a criminal offence for adults in positions of care, supervision or authority to engage in sexual activity with a child (person under 18 years). There are also a range of criminal (incest) offences where the victim and accused are closely related. Age of consent does not apply in these circumstances.)⁴

Child sexual exploitation

A form of sexual abuse targeting children and young people under 18 who are manipulated or coerced to undertake sexual acts in exchange for any actual or promised benefit, for example food, accommodation, affection, money and/or gifts.⁵

Child sexual exploitation can occur in person or online, and sometimes the child or young person may not even realise they are a victim.

Grooming:

⁴ [1.-NC-Language-Guide_FINAL.pdf](#)

⁵ [1.-NC-Language-Guide_FINAL.pdf](#)

Grooming is a process of manipulation and/or intimidation of a child, children, family, kin, carer(s), support network(s) or organisation(s), by a person(s), community or organisation(s), for the purpose or facilitation of child sexual abuse. This may be face to-face and/or technology-assisted manipulation, and can include emotional manipulation, erosion of autonomy, befriending, gift-giving, privileging, bullying, threatening, taunting, lying, isolating, silencing and controlling behaviours that create opportunity for, compliance with and non-disclosure of child sexual abuse.⁶

Exposure to family violence:

Family violence is behaviour by a person towards a family member that is:

- Physically or sexually abusive
- Emotionally (psychologically) abusive
- Coercive or in any way controls or dominates that family member and causes that family member to fear for their safety or wellbeing, or for that of another family member
- Causes a child to hear, witness or otherwise be exposed to the effects of the behaviour referred to above
- Exposes a child to family violence which includes seeing, hearing, or experiencing violence in a number of ways.

Child Abuse and Family Violence can co-exist.

Sexually harmful behaviour:

A broad range of sexual behaviours in children and young people. This includes behaviours that affect their own development, as well as behaviours that are coercive, sexually aggressive or predatory to others. Harmful sexual behaviours are those displayed by a child (person below 18 years) that cause harm to others and/or themselves. Harmful sexual behaviours exist across a continuum of inappropriate, problematic, abusive and/or violent sexual behaviours, and can occur face-to-face and/or via technology between children who are peers, friends, family members or strangers.⁷

Harm:

A reference to physical harm or psychological harm (whether caused by an act or omission) and, without limiting the generality of this subsection, includes such harm caused by sexual, physical, mental or emotional abuse or neglect.

Psychological harm does not include emotional reactions such as distress, grief, fear or anger that are a response to the ordinary vicissitudes of life.

Reporting obligations

ACS has zero tolerance for child abuse or harm in any form. All disclosures, allegations and concerns regarding child safety whether they are made by an adult or child are treated very seriously and responded to as soon as possible, in line with our Child Safe Reporting Procedure.

ACS places the child at the centre of its complaint processes, ensuring all steps contribute to supporting the best interests of the child. ACS provides child-friendly avenues for complaints and allegations, including providing children with a safe and supported environment, and the time they need, to make any complaints or allegations.

ACS, and all personnel, have legal obligations to contact relevant authorities when concerned about a child's safety. ACS follows these obligations rigorously and supports all personnel to do the same.

Regardless of legislative standards, ACS takes the stance that all personnel have a moral and ethical obligation to report concerns about child abuse, child harm, risk of harm and neglect to the relevant authorities. This approach is reflected in our Child Safe Reporting Procedure.

All personnel are required to report any incidents, concerns or allegations that a child has suffered harm,

⁶ [1.-NC-Language-Guide_FINAL.pdf](#)

⁷ [1.-NC-Language-Guide_FINAL.pdf](#)

or is at risk of harm, in line with our Child Safe Reporting Procedure. This includes:

- notifying your Director/Head of Sport/Manager and the Child Safety Officer of the concern or allegation as soon as possible;
- notifying the member school; and
- contacting police, DFFH and/or another appropriate agency

ACS will never prohibit or discourage personnel from reporting an allegation of child abuse or harm to a child. ACS will always take action to respond to a complaint in accordance with our Child Safe Reporting Procedure.

Protection of reporters

Any personnel member that makes a report in good faith in accordance with the Child Safe Reporting Procedure will be supported by the ACS, and will not be penalised by the ACS for making the report.

Member schools

The ACS will carry out its obligations in conjunction with its member schools (including when those schools are hosting sporting events), having regard to their ongoing duty of care to their students.

Recruitment

When recruiting and selecting personnel involved in direct or indirect child-connected work, the ACS will make all reasonable efforts to ensure all people employed directly with us (including volunteers) have passed screening procedures and do not pose a risk to children or young people. ACS will confirm the applicant's Working With Children Check (**WWCC**) and National Police Check status (where required) and/or professional registration; such as with the Victorian Institute of Teaching (**VIT**). The Executive Officer records all WWCCs and other checks on a spreadsheet that is checked annually to see who requires a renewal.

All personnel are required to maintain a valid Working with Children Check (WWCC) and provide evidence of this to ACS. The WWCC must be linked to ACS as one of the organisations for whom the person is working or volunteering, in line with guidelines. Any changes to circumstances must be reported to ACS immediately.

Any costs associated with gaining a valid WWCC will be the responsibility of the individual.

ACS applies appropriate, robust child safety human resources and recruitment practices including child safe interview questions and child safe reference checking. ACS will conduct thorough verbal reference checks to ensure the suitability of all candidates prior to their engagement. This will include the ACS making reasonable efforts to gather, verify and record the following information about a person whom it proposes to engage to perform child-connected work:

- WWCC status, or similar check;
- proof of personal identity and any professional or other qualifications;
- the person's history of work involving children;

- references that address the person's suitability for the job and working with children; and
- child safe questions during the reference check process.

The type of evidence that an applicant is required to provide to the ACS will vary depending on the type of position that they are applying for. However, the ACS will not offer any applicant a position at the ACS until they provide the required evidence.

All successful applicants engaged at ACS will be assessed on an ongoing basis:

- during any scheduled performance review; and
- after any concern is raised regarding their conduct with children, to ensure that they remain suitable for child-connected work.

Once engaged, the ACS will provide personnel with access to this policy and personnel must review and acknowledge their understanding of this policy.

The ACS requires that member schools ensure all personnel and volunteers (including coaches and any officials) likely to have contact with students have a current WWCC, which needs to be signed off annually as part of the membership process. Member schools are required to comply with ACS Child safety documents.

The ACS is committed to ensuring the physical environment is representative of different cultures and abilities. The ACS will apply a thorough screening and recruitment process which aims to:

- promote and protect the safety of all children within all ACS Environments;
- encourage applications from Aboriginal and Torres Strait peoples, people from culturally and/or linguistically diverse backgrounds, lesbian, gay, bisexual, trans and gender diverse, intersex and queer (LGBTIQ+) individuals, and people with a disability;
- identify and recruit the safest and most suitable candidates who share the ACS' values and commitment to child safety and wellbeing; and
- prevent a person from working at the ACS if they pose an unacceptable risk to children.

Partnerships

ACS completes child safety risk assessments as part of organisational review, before starting partnerships, and works with our partners to address any concerns regarding child safety practices and approaches. We will work collaboratively with Partners and Contractors to monitor, support and ensure reporting of all child safety matters.

Training

Ongoing training and education are important to ensure that everyone at ACS understands that child safety is everyone's responsibility.

ACS is committed to regularly training and educating its personnel on safeguarding children and young people and ensuring their wellbeing. ACS provides:

- child safety training on initial engagement and annually through in-person and online inductions;
- easy access to this policy and related procedures;
- supervision;
- performance review; and
- ongoing support to develop capability in detecting, reporting and preventing child abuse or harm.

All personnel are required to undertake child safety training on induction and annual refresher training, as well as any additional training identified by ACS as important for their role.

Risk Management

The ACS will ensure that child safety is a part of its overall risk management strategy approach.

The Executive Officer in conjunction with the Directors/Heads of Sport, will be responsible for identifying and managing child safety risks within all ACS Environments. Executive Officer will receive regular training in relation to child safety.

ACS uses processes and templates to complete thorough risk child safe assessments prior to any relevant physical or online activity commencing.

Monitoring and reviewing risks regularly (including after incidents, near misses or complaints) is vital to ensuring ongoing learning and continuous improvement. ACS also reviews its policies, procedures and potential risks following the introduction of new, or changes to existing, child safe standards or legislation, or in response to emerging leading practice.

If the Executive Officer or Directors/Heads of Sport identifies risks of child abuse occurring in one or more of the ACS Environments, the Executive Officer will make a record of those risks and specify the action(s) the ACS will take to reduce or remove the risks (i.e. risk controls).

As part of its risk management strategy and practices, the Executive Officer will monitor and evaluate the effectiveness of the implementation of its risk controls.

The Executive Officer will report any risks to child safety to the ACS Committee of Principals.

The ACS will ensure that there are appropriate human resources policies to assess personnel in relation to compliance with their child safe obligations and continued suitability for child-connected work.

The ACS will ensure that appropriate training at least annually is conducted for personnel.

The Executive Officer will be open to receiving feedback from all members of the community on how to improve its risk management approach and better protect the safety of children. Where possible, the ACS will do its best to work with local Aboriginal and Torres Strait Islander communities, culturally and/or linguistically diverse communities, lesbian, gay, bisexual, trans and gender diverse, intersex, queer, and asexual (LGBTIQ+) individuals and people with a disability. Feedback should be directed to the Executive Officer in writing.

Equity and diversity

ACS recognises the diverse circumstances of children and young people and their families. We are committed to providing environments where children and young people feel safe and are listened to and respected regardless of their abilities, sex, gender, sexual orientation, cultural, religious or economic background. ACS strives to ensure that equity and diversity, as a principle and practice, are built into all aspects of child safety, including our policies, procedures and education and training.

In particular, we promote the cultural safety, participation and empowerment of:

- Aboriginal and Torres Strait children and young people;
- Children and young people from culturally and/or linguistically diverse backgrounds;
- Children and young people who are unable to live at home;
- Children and young people who are lesbian, gay, bisexual, transgender, intersex and/or queer; and
- Disabled children and young people

Participation and Empowerment of Children

ACS has developed a safe, inclusive, and supportive environment that involves and communicates with children, young people and their parents and carers. We encourage child participation and engagement that informs safe operations and builds the capability of children to understand their rights and their responsibilities. ACS is committed to supporting and encouraging children and young people to use their voice to raise and share their concerns with a trusted adult at any time.

It is our policy that simple and accessible processes are in place to assist children and young people to develop appropriate knowledge and skills to identify and communicate when they do not feel safe.

ACS will promote the Child Safe Standards in ways that are readily accessible, easy to understand, and user-friendly to children and young people, including:

- Our Child Safety and Wellbeing policy is available on our website and in our office for children and young people and parents and carers to read;
- The Child Safety and Wellbeing policy is available via request to Child Safety Officer by contacting admin@acssport.org.au

Informed families

ACS recognises that informed families who are aware of our child safety processes and requirements are central to developing a child safe culture. We work hard to ensure families have access to our child safety materials,

including this policy and Child Safe Code of Conduct, as well as providing accessible feedback and complaints avenues. Input from parents and carers, children and young people on our child safety approach is always welcome.

Continuous Improvement

ACS is committed to continuous improvement across our operations and practice, particularly in our approach to child safety. When reviewing our approach to child safety, including key documents, we seek the input of personnel, children and young people and their parents and carers. Any incidents, near misses or complaints are reviewed to assess strengths and required improvements across our service.

Record Keeping

ACS accurately records all allegations of abuse and safety concerns using our Child Safe Incident Report form.

The ACS will keep all documentation and evidence received by it in relation to any allegation of child abuse and any request for redress in secure and confidential files under the supervision of the Executive Officer, and subject to Public Record Office Victoria Recordkeeping Standards. Records will be kept even if an investigation does not substantiate a complaint.

Relevant personnel will be informed of record keeping processes.

In accordance with Royal Commission recommendations ACS will keep these records for a minimum of 45 years or higher if legislation or policy dictates.

Communication

The ACS is pro-active in the area of safeguarding and will communicate this policy to all ACS personnel via the ACS's website www.acssport.org.au and email upon appointment. The ACS will also ensure open communication with families, carers and the ACS community about its child safe approach and relevant information is accessible.

This policy will be communicated to all personnel and Committee members via; internal memo, email, meetings and the ACS Handbook.

References to this policy will be included in documentation provided to all officials that represent the ACS.

The ACS will ensure that its child safety practices and its Child Safe Code of Conduct are communicated in an

accessible manner for:

- a) younger children, by discussing the documents in-person (and/or any other method deemed appropriate and effective for the particular age of the child);
- b) children, families and carers from culturally and/or linguistically diverse backgrounds; and
- c) children, families and carers living with a disability, by discussing the documents in-person (and/or any other methods deemed appropriate and effective for the particular type of disability that the child is living with).

Breaches and Disciplinary Action

ACS requires all personnel to adhere to the Child Safety and Wellbeing Policy. Where a breach in policy is identified, ACS will respond without delay in accordance with ACS policies and procedures. Those who breach this policy will face disciplinary action, up to and including termination of engagement. Any inappropriate behaviour will be reported as required through appropriate channels including Police and any relevant authority, in line with required legislation.

Privacy and confidentiality

The ACS will collect, use, disclose and hold personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs).

Principles

There are two guiding principles in respect to a child's privacy:

- a) First, the ACS will operate on "the best interests" principle. All personnel members will do what they believe to be in the best interest of the child. This principle supersedes all others; and
- b) Second, the ACS will respect a child's confidentiality except in situations where it conflicts with the best interests principle.

As much as is reasonably possible, an individual's confidentiality is to be protected. Both those who are making reports and those about whom accusations are being made are entitled to confidentiality. Where there is suspected abuse or misconduct, personnel must not disclose or make use of the information in a manner that breaches confidentiality, other than to report and act consistent with the Child Safety and Wellbeing policy, Child Safe Code of Conduct and Procedure, and relevant statutory requirements.

Monitoring and review

In accordance with the ACS's document management framework a review and evaluation of this Child Safety and Wellbeing policy, Child Safe Code of Conduct and Procedure shall be conducted at least every two years, and following every child safety incident, and improve where applicable.

The Executive Officer will be responsible for ensuring that this Child Safety and Wellbeing policy, Child Safe Code of Conduct and Procedure is reviewed and updated.

Related Policies and Documents

This Child Safety and Wellbeing Policy is to be read in conjunction with other related policies and

procedures. These include our:

- Child Safe Code of Conduct
- Child Safe Reporting Procedure