

Child Safety and Wellbeing Policy**Date of issue:** 15 April 2025**Next review date:** April 2027**Policy owner:** Child Safety and Wellbeing Officer**Policy sponsor:** General Manager, Corporate and Governance**Policy approver:** CEO**Attachments:** A) Statement of Commitment; B) SSCT Code of Conduct relating to child safety and wellbeing; C) Recognising signs of child abuse or harm

1. Background

The State Sport Centres Trust (SSCT) is required to comply with the Child Safe Standards, which set out the compulsory minimum standards for organisations that provide services for children and young people (or where services and facilities are used by children and young people), to help protect them from harm. (The standards can be viewed in full here: <https://ccyp.vic.gov.au/child-safe-standards/the-11-child-safe-standards/>)

The SSCT provides several services and programs dedicated to children and young people, including occasional care, holiday programs, school programs, swim squad and swim schools. SSCT venues and facilities are visited by children and young people through events and activities with their families, friends, schools and as general members of the public. The SSCT also employs young people across its venues.

This policy is informed and guided by the following:

- *Child Wellbeing and Safety Act 2005* and associated regulations and standards (Victorian Child Safe Standards)
- *Children, Youth and Families Act 2005*
- *Family Law Act 2005*
- *Privacy and Data Protection Act 2014*
- Royal Life Saving Australia's Child Safety in Aquatic Facilities (draft guidelines)
- A guide for creating a Child Safe Organisation from the Commission for Children and Young People (April 2023)

Various resources from the Department of Health and Human Services and Department of Education and Training

2. Purpose

This policy aims to ensure that all employees, volunteers and contractors (together, known as “staff” or “staff members”) engaged by the SSCT are aware of the organisation’s commitment to create and maintain a child safe culture that meets the Child Safe Standards.

A child safe environment means the organisation has shared attitudes, values, policies and practices that prioritise the safety and wellbeing of children and young people.

3. Scope

This policy applies to all staff and to the broad range of situations where interaction with children and young people may occur at the SSCT’s venues and facilities. While this policy sets out the overarching policies applicable to all staff members and programs, the SSCT’s occasional care facility is subject to additional regulations and standards.

Work instructions subsequently drafted to provide further guidance pursuant to this policy are deemed to be part of this policy.

4. Definitions

CCYP is the Commission for Children and Young People.

Child means a child or young person under the age of 18 years.

Child abuse means:

- a sexual offence committed against, with or in the presence of, a child, whether or not a criminal proceeding in relation to the offence has been commenced or concluded
- sexual misconduct, committed against, with or in the presence of, a child
- physical violence committed against, with or in the presence of, a child
- any behaviour that causes significant emotional or psychological harm to a child or significant neglect of a child.

Child Safety and Wellbeing Officer is the individual responsible for providing child safety services within the organisation, including assessment, intervention and management of risks to the safety and wellbeing of children and young people who visit SSCT venues.

Reportable Conduct Scheme means the scheme established by the *Child Wellbeing and Safety Act 2005 (Vic)* which creates obligations on the heads of organisation to report allegations of child abuse and misconduct by staff members. **Statement of Commitment** is the SSCT’s express commitment to child safety and wellbeing, as set out in Attachment A.

5. Child Safe Standards

Standard 1

Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued.

The SSCT is committed to establishing an inclusive and culturally safe environment where the strengths of Aboriginal culture, values and practices are respected.

The SSCT is committed to ensuring racism within the organisation is identified, confronted and not tolerated.

We think about how visitors can have a positive experience in a safe environment. For Aboriginal children and young people, we recognise the link between Aboriginal culture, identity and safety and actively create opportunities for Aboriginal visitors and the Aboriginal community to have a voice and presence in our planning, program design and activities by looking for opportunities that:

- encourage and support children to express their culture and enjoy their cultural rights
- support and facilitate participation and inclusion within the organisation by Aboriginal children and their families
- recognise and celebrate Aboriginal peoples, their achievements, communities and cultures through celebrations of Aboriginal culture and staff training on Aboriginal cultural safety.

Standard 2

Child safety and wellbeing is embedded in organisational leadership, governance and culture.

To achieve this, we:

- publicise our Statement of Commitment
- prioritise child safety and wellbeing issues when addressing feedback and managing incidents
- document duty of care obligations in recruitment policies and staff position descriptions
- provide guidance to staff about promoting child safety and wellbeing
- outline expected standards of behaviour of staff members in the SSCT Code of Conduct relating to child safety and wellbeing (see Attachment B) and take appropriate action to deal with breaches

- make staff aware of the Child Safe Standards through a dedicated staff intranet page and providing targeted training for key staff.

Standard 3

Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously.

The SSCT has strategies in place to develop a culture that facilitates participation and is responsive to the input of children and young people.

We make available age-appropriate and easy to understand documents that support children to raise complaints, feedback or concerns. We facilitate children and young people raising safety concerns for themselves, their friends or peers.

We identify ourselves to children and young people by wearing our name badge at all times.

We support staff to seek, listen to and act on the voices of children when making decisions that have an impact on children and young people.

Standard 4

Families and communities are informed and involved in promoting child safety and wellbeing.

The SSCT considers that families and the community of visitors have an important role in monitoring and promoting children's safety and wellbeing and helping children to raise any concerns.

To support family engagement, the SSCT is committed to providing families and community with accessible information about the SSCT's child safe policy and practices and involving them in the organisation's approach to child safety and wellbeing.

We welcome feedback from our visitors, families and communities about our facilities and services and their experiences.

Standard 5

Equity is upheld and diverse needs respected in policy and practice.

As a child safe organisation, we celebrate the rich diversity of our visitors, families and communities and promote respectful environments that are free from discrimination. Our focus is on wellbeing and growth for all. We recognise that every child has unique skills, strengths and experiences to draw on.

We pay particular attention to individuals and groups of children and young people in our community with additional and specific needs. This includes tailoring our child safety strategies and supports to the needs of:

- Aboriginal children and young people
- children from culturally and linguistically diverse backgrounds
- children and young people with disabilities
- children unable to live at home or impacted by family violence
- international students
- children and young people who identify as LGBTIQ+.

We train our staff on recognising, understanding and supporting diversity, equity and inclusion. We strive to reflect the diverse and intersecting interests, needs, experiences and cultures of the children and families we work with. We acknowledge or celebrate important cultural dates in our workplace.

Standard 6

People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

The SSCT applies robust child safe recruitment, induction, training, and supervision practices to ensure that all staff, contractors, and volunteers are suitable and appropriately qualified to work with children.

When engaging staff to perform child-related work, we:

- establish position descriptions that set clear expectations about the roles, requirements, duties, and responsibilities regarding child safety and wellbeing
- sight, verify and record the person's current Working with Children Check
- collect and record:
 - proof of the person's identity and any professional or other qualifications
 - the person's history of working with children
 - references that address suitability for the job and working with children.

Standard 7

Processes for complaints and concerns are child-focused.

We require staff to treat allegations of child abuse and harm seriously. We provide information and training for staff about how to respond to allegations and concerns.

We publish child-friendly information on our website for children and young people about how to make a complaint. We register feedback, complaints and concerns in our systems, respond within a reasonable time and keep people informed of progress and any delays.

Standard 8

Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

All staff members are required to participate in the SSCT's child safety and wellbeing induction and ongoing training program. The program focuses on:

- this policy
- the SSCT Code of Conduct
- any other child safety and wellbeing information that the SSCT considers appropriate to the nature of the role.

Standard 9

Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

We identify, assess and manage risks to child safety and wellbeing in venues and facilities. These risks are managed through our child safety and wellbeing policy and practices.

Ongoing training and education are essential to ensuring that staff understand their roles and responsibilities and develop their capacity to effectively address child safety and wellbeing matters.

In addition to the child safety and wellbeing induction, staff participate in a range of training and professional learning to equip them with the skills and knowledge necessary to maintain a child safe environment.

Standard 10

Implementation of the Child Safe Standards is regularly reviewed and improved.

The SSCT has established processes for the review and ongoing improvement of its child safety policy and practices. We undertake to:

- review and improve this policy every 3 years or after any significant child safety incident
- analyse any complaints, concerns, and safety incidents to improve policy and practice
- act with transparency and share pertinent learnings and review outcomes with staff.

Standard 11

Policies and procedures document how the organisation is safe for children and young people.

This policy, related Work Instructions and the SSCT Code of Conduct relating to child safety and wellbeing document our general approach to child safety and wellbeing and our expectations of staff.

6. Procedures

6.1 Responsibilities

Role	Responsibility
Trust	<ul style="list-style-type: none"> has overall responsibility for the organisation's compliance with this policy provides overall risk governance, including management of child safety and wellbeing risks.
Audit & Risk Committee (ARC)	<ul style="list-style-type: none"> oversees the operation and implementation of the risk management framework, including child safety and wellbeing risks.
CEO	<ul style="list-style-type: none"> ensures Trust and Audit and Risk Committee are notified of changes to, or instances of non-compliance with this policy
Executive Team	<ul style="list-style-type: none"> approves this policy ensures compliance with this policy ensures implementation of this policy within their teams encourages the building of a child safe culture and builds child safety into the everyday thinking and actions in the organisation.
Child Safety and Wellbeing Officer	<ul style="list-style-type: none"> champions child safety matters in all contexts and forums so that safeguarding children and young people becomes an embedded part of SSCT planning, operations and culture oversees any mandatory notifications or reportable conduct is the key point of contact for child safety breaches, incidents and concerns provides guidance to managers and business units to support implementation of this policy coordinates assurance reporting to the Executive team, ARC and Trust, on implementation of this policy and any additional actions required to ensure SSCT compliance keeps abreast of any developments to relevant legislation and best practices.

General Manager – Corporate and Governance	<ul style="list-style-type: none"> ensures that relevant stakeholders to this policy are appropriately engaged and consulted reviews and refreshes this policy, as required provides support to the Child Safety and Wellbeing Officer, as required.
General Manager, People and Culture (delegated via People Support, Manager)	<ul style="list-style-type: none"> ensures recruitment policies and practices are in line with this policy ensures all new staff members are enrolled in the online e-learning modules during the induction period ensures ongoing training is provided to staff members regarding this policy and records staff completion of training manages complaints and allegations against staff relating to child abuse, in consultation with the Child Safety and Wellbeing Officer.
Managers	<ul style="list-style-type: none"> conduct spot checks of program activities and services to ensure adherence to this policy ensure staff members within respective business units understand and adhere to this policy ensure that child safe implementation plans are current provide status reports on child safe implementation plans to the Executive team, where relevant, in collaboration with the Child Safety and Wellbeing Officer provide report to Executive team on allegations of child abuse, complaints or child safety concerns raised in the organisation, in collaboration with the Child Safety and Wellbeing Officer provide report to Executive team on child abuse and harm risks identified, management plans, whether mitigation actions have been implemented and whether they have been effective, in collaboration with Child Safety and Wellbeing Officer.
All staff	<ul style="list-style-type: none"> understand, implement and comply with this policy and related code of conduct and Work Instructions not tolerate any form of child abuse or mistreatment report any suspected child abuse to the Child Safety and Wellbeing Officer seek advice from the Child Safety and Wellbeing Officer, when required.

6.2 Communication

Staff must ensure that patrons and visitors have access to the SSCT's Statement of Commitment. In addition to the SSCT's website, the Statement of Commitment, where possible, should be shared and communicated in the following ways:

- displayed in a prominent location within the centre
- communicated to patrons through newsletters and other direct mail
- within staff induction packs
- displayed in staff rooms
- shared regularly within staff meetings and staff communications.

6.3 Risk assessments

Risk identification and mitigation are fundamental to keeping children safe from harm. The management of risks of child abuse and harm is embedded in the organisation's leadership, governance and culture. This is evidenced in the management of child safety and wellbeing risks in:

- the SSCT's enterprise risk register
- business unit risk registers
- program or project risk assessments
- the incident management system.

6.4 Cultural safety

Cultural safety has been described as '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'. It empowers people and enables them to contribute and feel safe to be themselves'. At the SSCT, staff are encouraged to support children and young people within SSCT premises to express their culture and enjoy their cultural rights. These can include children:

- learning their histories, stories and traditions
- being part of cultural practices
- learning and speaking their language without discrimination.

The SSCT recognises and celebrates Aboriginal peoples, their achievements, communities and cultures. Each July, the SSCT hosts events across SSCT facilities celebrating and reflecting on the rich history, culture and achievements of Aboriginal and Torres Strait Islander peoples during NAIDOC Week.

Cultural safety is an ongoing learning journey. Staff are provided with training on cultural awareness and cultural safety.

6.5 Physical contact with children

Due to some of the services and programs provided by the SSCT, SSCT staff may be required to have physical contact with children and young people. Physical contact with children is appropriate if it:

- is used to assist in skill development
- is required for the child's safety
- occurs in an open environment, and/or
- is required within the course of work duties, such as changing a nappy.

Physical contact with children is inappropriate if it:

- includes touching any part of the body that may cause distress or embarrassment.
- frightens, distresses or embarrasses a child, or
- occurs in a private place.

6.6 Recognising when a child is at risk

Whether child abuse and harm are perpetrated in the organisation or in the home, being aware of behavioural indicators that may signify a child is being abused is important to creating a child safe organisation.

Different types of child abuse and harm can have different indicators. Information on indicators of the different types of abuse and harm is set out in Attachment C.

6.7 Breach of policy or code of conduct relating to child safety and wellbeing

Staff members who suspect a breach of this policy or related code of conduct must report their concerns to their line manager or the Child Safety and Wellbeing Officer. If the breach involves the staff member's direct line manager, staff can report to the manager's supervisor.

Members of the community can also report any breach of the policy and code of conduct to the Child Safety and Wellbeing Officer.

If the breach involves alleged or suspected child abuse, staff members must notify the Child Safety and Wellbeing Officer and follow the procedures set out in section 6.8.

6.8 Allegation of abuse or harm

6.8.1 Reportable conduct

The SSCT supports self-reporting by children and young people. Staff members should encourage children and young people to inform them of any activity, behaviour or person that makes them feel uncomfortable or unsafe. This will be performed with the understanding and respect of any needs related to diversity and/or disability.

All notifications, whether by staff members or against a staff member, will be treated with strict privacy and confidentiality.

If a staff member suspects or receives a report that a child is the subject of abuse or negative treatment, they are required to report it as follows:

- As soon as the abuse is suspected, the concern must be raised with the Child Safety and Wellbeing Officer and the General Manager, People and Culture (if the allegation is against a staff member). The Child Safety and Wellbeing Officer must ensure an incident report is completed in the incident management system (with appropriate confidentiality settings).
- If the allegation relates to a reportable conduct, the Child Safety and Wellbeing Officer must notify the Chief Executive Officer, prior to reporting to the CCYP. The Chief Executive Officer should provide a report to the Trust and the Audit and Risk Committee, as needed.
- Where required, the Child Safety and Wellbeing Officer will take the complaint to the Police for further action.

In the event of an allegation or complaint against a staff member, a full investigation in line with SSCT Incident Reporting and Investigation Procedure will be conducted. The Child Safety and Wellbeing Officer and the General Manager, People and Culture will meet to determine which suitably qualified staff member is best placed to complete the investigative tasks.

Investigative tasks may include:

- Interviewing complainants (including children and parents) and any witnesses.
- Gathering and analysing all available information, including reviewing CCTV footage.
- Interviewing staff members involved in the complaint.
- Making a finding, on the balance of probabilities, if the claims are substantiated or not.
- Completing a report with recommendations of next steps.

. During such investigation, at the General Manager, People and Culture absolute discretion, in consultation with the Child Safety and Wellbeing Officer, the worker will:

- be assigned to other duties that do not require direct contact with children or be stood down from work on full pay
- not contact the child or parent/guardian involved in a complaint.

Under such circumstances, relevant human resources policies and procedures apply. Reinstatement of a worker will only occur after all allegations have been fully investigated and have been found to be without merit based on a balance of probabilities.

6.8.2 Mandatory reporting scheme

In addition to reporting requirements under the Child Safe Standards, the SSCT's Occasional Care is also subject to the mandatory reporting scheme pursuant to the *Child, Youth and Family Act 2005* and *Family Law Act 2005*. If an SSCT occasional care staff member forms a belief on reasonable grounds that a child is in need of protection from physical injury or sexual abuse, that staff member must notify the Child Safety and Wellbeing Officer. The Child Safety and Wellbeing Officer will make the report to Child Protection.

6.8.3 Failure to report

Failing to report child abuse may be a criminal offence in some circumstances.

6.9 Filming & Photography

The following guidelines apply for all filming and photography taken at any SSCT venues and facilities.

6.9.1 General

The SSCT does not impose a blanket ban on photography or filming of children at SSCT venues and facilities. The SSCT recognises the expectation of a patron to record sporting achievements, including a parent or carer wishing to record their child or young person's sporting achievements, but this expectation is balanced with other patrons' expectations of privacy and protecting children and young people from abuse and harm. In allowing filming and photography, the SSCT applies the following conditions:

- a) All images or video taken must be for private (non-commercial) use only, unless otherwise previously approved by the SSCT.
- b) Permission should be obtained from the child's parent/guardian prior to taking any images or video of a child or young person, including filming as a tool to review and develop performance.
- c) If parents, carers and other visitors are taking photographs or filming crowds or performances, these images must be used respectfully.
- d) The SSCT prohibits inappropriate filming and photography, including but not limited to photos or videos taken:
 - indecently, which includes any form of nudity, 'up skirting', 'down blousing' or any footage obtained covertly

- of specific children and young people who have no relation or association with the person taking the photos or videos
 - within a private area such as change rooms, toilets, showers, steam room or sauna (this includes open showers)
 - for the purposes of voyeurism
 - of any part of the body with the intent of sexualisation of the body or part
 - of individuals protected by court order as this can divulge an individual's location and place them in danger.
- e) If an SSCT staff member has reasonable concerns that an individual is filming or taking photographs inappropriately, the SSCT may do one or more of the following:
- ask the individual to delete the video or photograph(s) to the SSCT staff member's satisfaction,
 - ask the individual to leave the SSCT premises, and/or
 - call the local police.
- f) The SSCT uses CCTV surveillance in accordance with the *Privacy and Data Protection Act 2014*.

6.9.2 Professional videographers and photographers

- a) All external parties filming or taking photos need to register with SSCT by completing a Filming and Photography Authorisation Form.
- b) Professional photographers, videographers, members of the media, unauthorised coaches, spectators or other visitors to the SSCT are not permitted unsupervised access to children or young people.
- c) Permission needs to be obtained from a parent/guardian prior to taking any images of all children and young people, ensuring that they are aware of the way in which the image may be used.

6.9.3 Filming and photography by SSCT employees

Where the SSCT proposes to film, televise, photograph and otherwise record images of patrons, for example, for marketing purposes, it will notify and provide parents or carers with the reasonable opportunity to withhold or withdraw consent from any such recording. Parents or carers may withhold or withdraw consent on behalf of children and young people in their care by providing notice to the SSCT.

6.10 General recruitment and contracting

6.10.1 Working with Children Check

All staff members are required to have a valid Working with Children Check.

6.10.2 Position description

In drafting a position description, staff must determine if the role will involve direct or indirect contact with children. This will influence the screening and types of questions for the selection process. Direct contact includes:

- supervision, leadership and control over children
- delivering programs and services for children
- delivering education and training sessions to children
- delivering or supervising coaching or practical training sessions to children.

6.10.3 Advertising

Job advertisements should clearly reference the Statement of Commitment and the organisation's zero tolerance for child abuse and harm. It should also include a statement of the SSCT's commitment to providing an inclusive and welcoming environment and promoting cultural safety for children. This should be included in all advertisements, position descriptions and other related documents.

6.10.4 Assessing the application

In assessing the suitability of an applicant, particularly for a role with direct contact with children, staff should consider asking the following questions:

- Why they want to work or volunteer with children
- Their understanding of professional boundaries between adults and children
- Attitudes to children's rights and how they can be upheld
- Understanding of, or willingness to learn about, the importance of cultural safety for Aboriginal children
- Understanding of, or willingness to learn about the diverse needs of children
- Whether their values and past behaviours align with a commitment to child safety and zero tolerance of child abuse and harm.

6.10.5 Reference checks

Staff should consider asking referees to assess an applicant's suitability to work with children:

- Have you observed the applicant interacting with children and/or managing the behaviour of children?

- Do you have concerns about the applicant working with children?
- Did you have any disciplinary matters relating to the applicant or concerns about their adherence with the organisation's Code of Conduct?
- Would you employ them again?

6.10.6 Third-party contractors

When selecting third-party contractors, staff must conduct a risk assessment of the types of services that the organisation is contracting for and the level of contact the contractor or their staff will have with children. Staff must assess whether, and the extent to which, the engagement of third-party contractors poses risks of child abuse and harm. The risk assessment may indicate that the preferred contractor will need to go through a child safe selection as set out above.

Depending on the level of risk posed by third-party contractors, staff should consider the following actions:

- Requiring third-party contractors to comply with this policy
- Monitoring compliance by third-party contractors with the Child Safe Standards
- Working with third-party contractors to identify, prevent and reduce risks of child abuse and harm
- If unable to adequately manage risks of child abuse and harm, staff should consider terminating the contract or take other appropriate action to protect children.

6.10.7 When recruiting staff younger than 18 years old

The SSCT acknowledges its legal obligations to provide a safe and healthy working environment and child safe environment for all employees and recognises that there may be additional obligations when an employee is younger than 18 years old (referred to as "young people" for the purposes of section 6.10.7).

Managers should consider a customised induction program for young people, who are unlikely to have significant workplace experience. Consult with People Support for guidance.

Managers should consider that young people cannot be expected to possess the judgment or maturity of older staff members. When requiring young people to comply with SSCT rules and procedures, managers must explain those requirements and provide any necessary information, instruction and training.

Managers should consider appropriate supervision and be receptive to young people's feedback about their employment and any concerns they may have about their safety and wellbeing at the workplace.

7. Related policies

Complaints handling

Privacy

Occasional Childcare Child Safety and Wellbeing and related documents

Risk management

Contractor management

Inclusion action strategy 2022-2025

Gender equality action plan 2022-2025

Attachment A: Statement of Commitment to Child Safety and Wellbeing

The State Sport Centres Trust (SSCT) is committed to the safety and wellbeing of children and young people.

We seek to prevent harm of any kind impacting children and young people and have zero tolerance for racism, child abuse, discrimination and inequality. Children and young people's rights, relationships, identity and culture must be recognised and respected, their voices heard, and their concerns acted upon.

We aim to foster a culturally safe, child safe and child friendly environment for all children and young people we have contact with, deliver services to, or are visitors to our venues and facilities.

The SSCT requires all staff to uphold these commitments. The SSCT has specific policies, work instructions and training in place to achieve these commitments.

Attachment B: SSCT Code of Conduct relating to child safety and wellbeing (for inclusion in the SSCT Code of Conduct)

All employees, contractors and volunteers (together, known as 'staff members') of the State Sport Centres Trust (SSCT) are responsible for the safety, wellbeing and empowerment of children and young people who we employ, have contact with, deliver services to, or are visitors to our venues and facilities. All staff members are expected to act in accordance with all relevant legislation, the Child Safety and Wellbeing Policy and the SSCT Code of Conduct.

The SSCT Code of Conduct describes a common set of expectations for SSCT staff members. This section of the SSCT Code of Conduct relating to child safety and wellbeing addresses the requirements when staff members might interact with children and young people within the State Sport Centres (SSC). It has been developed to help staff members safeguard those children and young people from physical or emotional harm and neglect.

1. Positive guidance and discipline

The SSCT strives to ensure that children and young people attending SSC are aware of the acceptable limits of their behaviour so that a positive experience can be provided for all participants. Children are encouraged to feel safe, be safe and to have positive relationships and friendships with their peers and others attending SSC.

There are times however when staff members may be required to use appropriate techniques and behaviour management strategies to ensure:

- an effective and positive environment for all participants
- the safety and/or wellbeing of other children, young people or personnel participating in any of the programs, school excursions and/or sporting activities.

We require our staff members to use 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 direction and given an opportunity to redirect their misbehaviour in a positive manner.

Under no circumstances are our staff members to take disciplinary action involving physical punishment or any form of treatment, verbal or otherwise, that could reasonably be considered as degrading, cruel, frightening or humiliating. This kind of behaviour may result in a formal investigation being undertaken. Appropriate disciplinary action may follow and may result in termination of employment.

2. Use of language and tone of voice

Language and tone of voice used in the presence of children and young people should provide clear direction, boost their confidence, encourage or affirm them. It should not be harmful to children. In this respect, staff members must avoid language that is:

- discriminatory, racist, sexist or sexual
- derogatory, belittling or negative, for example, calling a child a 'loser' or telling them they are 'too fat'
- intended to threaten or frighten.

3. Use of electronic and online communications

The SSCT prohibits all personal electronic communication between staff members and the children and young people who visit the SSC and to whom we provide service, except when authorised with the express permission of a member of the Executive Team and the child's parent or guardian.

4. Adhering to professional role boundaries

SSCT staff members should not, of their own volition or at the request of a service user, act outside the confines of their duties (as specified in their position description) when helping to deliver customer service, lessons, activities or schools' programs, unless reasonably deemed appropriate, such as a child or young person asking for information from administrative support staff.

SSCT staff members:

- must not provide unauthorised transportation, for example, driving children between sites in a personal vehicle, or offering an unaccompanied child a ride on a work buggy or vehicle
- must not engage in activities with children or young people who are visitors to our organisation outside school excursions, family activities or schools' programs, such as usage of facilities usually closed to the public, unless reasonably expected in offering onsite assistance
- must not provide any form of support to a child or young person or their family unrelated to general visitation or our family activities and schools' programs, for example, offering swimming or sports lessons at the child's home or babysitting
- must not seek contact with children or young people outside visits to the SSC venues, family activities or schools' programs, unless authorised and through approved workplace channels of communication
- must not 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 SSC activities, family activities or schools' programs – or at the request of their family

- must not develop any 'special' relationships with children that could be seen as favouritism (for example, through gift giving, special treatment or inappropriate attention for specific children)
- must not engage in open discussions of a mature or adult nature in the presence of children (for example, out of work hours social activities).

If any staff member 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 the SSCT's usual service, they should, at the earliest opportunity; contact the child or young person's parent or guardian, refer the matter to an appropriate support agency, refer the child or young person to an appropriate support agency, and/or seek advice from the Child Safety and Wellbeing Officer and/or management.

5. Physical boundaries and contact

Any physical contact with children and young people who are attending SSC venues must be appropriate to the delivery of programs, school excursions and/or sporting activities, such as when demonstrating swimming strokes, helping children to climb down from equipment, providing first aid treatment, etc. If physical contact is required, it must be based on the needs of the child or young person (such as to assist or comfort a distressed young person). Under no circumstances should any SSCT staff member have physical contact with children or young people visiting SSC or participating in any SSCT activities and schools' programs that:

- would appear to a reasonable observer to have a sexual connotation
- involves intentional touching of genitals
- is intended to cause pain or distress to the child or young person – for example corporal punishment
- is overly physical – for example, wrestling, horseplay, tickling or other roughhousing
- is unnecessary – for example, 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/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,
 - the incident must be reported to the line manager and Child Safety Officer immediately, and

- if first aid is administered as part of injury prevention with a child, this must be documented within an Incident Report as per normal protocol.

6. Public and staff toilets

No child or young person is to be accompanied to a public or staff toilet without their carer, teacher or guardian. Staff members should avoid one-to-one situations with a child or young person in any toilet or change facilities unless in extreme circumstances where it would be deemed reasonable to do so (for example, a child without a parent or guardian is observed to be visibly distressed, unsafe or in need of medical attention in a public toilet). In those circumstances staff are to follow the Incident Management Procedure and request assistance as soon as possible. Staff members should not do anything of a personal nature for a child or young person that the child or young person can do for themselves, such as toileting and changing clothes.

7. Sexual misconduct

Under no circumstances is any form of sexual behaviour to occur between, with, or in the presence of, children or young people visiting or participating in any of the programs, school excursions or sporting activities being undertaken at the SSC. Engaging in sexual behaviour while on SSC premises or while representing SSCT is prohibited even if the young persons involved may be above the legal age of consent. 'Sexual behaviour' needs to be interpreted widely, to encompass the entire range of actions that could reasonably be regarded as sexual in nature, including but not limited to:

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

8. Reporting obligations

All personnel **MUST** make an Incident Report as soon as possible if:

- they become aware of any child safety concerns or allegations
- they observe any SSCT staff member whose practice or behaviour is contrary to the expectations of behaviour set out in this Code of Conduct
- any physical contact is initiated by a child or young 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, our personnel and any other participants.

*SSCT staff members, visitors to the SSC and members of the community can report any breach of the SSCT child safety and wellbeing policy and this code of conduct to the SSCT Child Safety Officer.

*The privacy of all personal information related to child safety reporting for all involved parties will be protected throughout any reporting process – in person and in records management.

Attachment C: Indicators of abuse

This information sheet is designed to assist staff to recognise the physical and/or behavioural signs of child abuse. The information set out below has been copied from the Child Safe Standards toolkit: Resource 4B of the Department of Health and Human Services available at <https://providers.dhhs.vic.gov.au/child-safe-standards>.

Physical violence

Physical violence occurs when a child suffers or is likely to suffer harm from a non-accidental injury or injuries inflicted by another person. Physical violence can be inflicted in many ways, including beating, shaking, burning or use of objects.

Physical indicators include (but are not limited to):

- unexplained bruises, burns or welts
- fractured bones, sprains or dislocation
- cuts, grazes or scratches
- ligature or bite marks
- bald patches or hair missing in tufts
- missing or loosened teeth
- poisoning or medication overdose.

Behavioural indicators include (but are not limited to):

- inconsistent, vague or unlikely explanations of an injury
- wariness, fear or distrust of adults
- avoidance of physical contact
- disproportionate reactions or limited emotion displayed when hurt or threatened
- wearing clothing that is unsuitable for the weather conditions (to hide injuries)
- unexplained absences and decline in academic performance
- substance abuse, self-harm or suicide attempts.

Sexual offences

Sexual offences occur when a person involves a child in sexual activity, or deliberately puts the child in the presence of sexual behaviours that are exploitative or inappropriate to his/her age and development. Child sexual abuse can involve a range of sexual activity including fondling,

masturbation, penetration, voyeurism and exhibitionism. It can also include exposure to or exploitation through pornography or prostitution, as well as grooming behaviour.

Physical indicators include (but are not limited to):

- bruising, bleeding or discharge from the genital or rectal area
- signs of pain, itching or discomfort in the genital or rectal area
- presence of sexually transmitted diseases
- frequent urinary tract infections
- pregnancy (actual or suspected)
- self-mutilation.

Behavioural indicators include (but are not limited to):

- displaying age-inappropriate sexual behaviour or knowledge
- promiscuity or inappropriate expressions of affection
- sudden fears of specific places or particular adults
- obsessive and compulsive washing
- complaining of headaches, stomach pains or nausea
- sleeping difficulties
- poor self-care or personal hygiene
- regressive behaviours such as bedwetting and speech loss
- substance abuse, self-harm or suicide attempts.

Serious emotional or psychological abuse

Serious emotional or psychological abuse occurs when harm is inflicted on a child through repeated rejection, isolation or by threats of violence. It can include derogatory name-calling, put-downs or persistent and deliberate coldness from a person, to the extent where the child's behaviour is disturbed and/or their emotional development is at serious risk of being impaired. Serious emotional or psychological abuse could also result from conduct that exploits a child without necessarily being criminal, such as encouraging a child to engage in inappropriate or risky behaviours.

Physical indicators include (but are not limited to):

- delays in emotional, mental or physical development
- speech impairments such as stuttering or being selectively mute
- rocking, thumb-sucking or other infantile behaviours

- eating disorders.

Behavioural indicators include (but are not limited to):

- exhibiting high anxiety or symptoms of stress
- poor self-image or low self-esteem
- displaying aggressive, demanding or attention-seeking behaviour
- compulsive lying or stealing
- unexplained mood swings or depression
- poor social and interpersonal skills
- excessive neatness or cleanliness
- substance abuse, self-harm or suicide attempts.

Serious neglect

Serious neglect is the continued failure to provide a child with the basic necessities of life such as food, clothing, shelter, hygiene, medical attention or adequate supervision, to the extent that the child's health, safety and/or development is, or is likely to be, jeopardised. Serious neglect can also occur if an adult fails to adequately ensure the safety of a child where the child is exposed to extremely dangerous or life-threatening situations.

Physical indicators include (but are not limited to):

- frequent hunger or signs of malnutrition
- poor personal hygiene
- appearing dirty and unwashed
- lack of adequate or suitable clothing
- unattended health problems
- appearing pale and weak
- inadequate shelter or unsanitary living conditions.

Behavioural indicators include (but are not limited to):

- stealing or begging for food
- aggressive or self-destructive behaviour
- involvement in criminal activity
- poor, irregular or non-attendance at school
- refusal or reluctance to go home
- limited positive interaction with parents, carers or guardians
- poor academic performance
- substance abuse.