South East Leisure

Child Safety and Wellbeing Policy

Purpose

South East Leisure (SEL) is dedicated to protecting children and young individuals from harm by implementing a comprehensive framework of strategies, practices, policies, and procedures to ensure their safety and wellbeing.

This policy aims to:

- embed an organisational culture of child safety, for all children with particular emphasis on the cultural safety of Aboriginal and Torres Strait Islander children, children from culturally and/or linguistically diverse backgrounds, children with disabilities, and children who identify as LGBTQIA+;
- assist SEL to prevent and respond to any actual, suspected or alleged abuse or safety concerns of children;
- inform SEL employees, volunteers, and contractors of their legal and duty of care obligations in reporting alleged abuse and neglect.

This policy is intended to operate in conjunction with the Mandatory Reporting and Reportable Conduct requirements which apply to some groups of employees at SEL.

Scope

This policy applies to all SEL Directors and employees (permanent, fixed term or casual), volunteers, members, patrons and contractors.

Victoria's commitment to child safety is demonstrated through the framework of the Child Safe Standards (the Standards) made under the *Child Wellbeing and Safety Act 2005.*

Definitions

The following words and phrases are defined in Appendix One of this policy:

- Aboriginal and/or Torres Strait Islander
- Child Abuse
- Child Safe Standards
- Child/ Young person
- Children/young people from culturally and/or linguistically diverse backgrounds
- Cultural Safety for Aboriginal and Torres Strait Islander Children
- Emotional or Psychological abuse
- Grooming
- Harm
- LGBTIAQ+

- Mandatory Reporting
- Neglect
- Reasonable belief
- Reportable Conduct Scheme
- Sexual abuse

South East Leisure's Commitment to Child Safety and Wellbeing

SEL is committed to providing an environment where children and young people accessing sports and recreation are safe and feel safe, empowered and secure.

At SEL, our core values of Care, Open, Fun and Sustainable are the cornerstones of our practices, fostering safe, enjoyable, and inclusive environments for all children regardless of their cultural background, abilities, or beliefs.

We commit to:

- maintaining a zero-tolerance approach towards child abuse (including grooming for abuse) and reportable conduct, recognising the paramount importance of our responsibilities for child safety and wellbeing.
- proving an environment that respects and supports everyone, with particular emphasis on the cultural safety of Aboriginal and Torres Strait Islander children and young people, children and young people from a culturally and/or linguistically diverse backgrounds, children with disabilities and children who identify as LBGTQIA+.
- empowering children and vulnerable individuals by informing them of their rights and responsibilities and supporting them to speak up about any matters of importance to them, including if something goes wrong. We work to include the participation of children in decision making regarding any services or other matters affecting them.
- preventing children and vulnerable people's abuse and identifying risks early, and where possible, to remove and reduce these risks.
- ensuring all allegations and safety concerns are treated seriously and consistently in line with SEL's policies and procedures, and all relevant legislation.
- upholding and following our legal and moral obligations to contact authorities when it is concerned about a child or young person's safety.
- maintaining robust human resources and recruitment practices for all SEL Team Members and volunteers, ensuring they are properly screened.
- regularly training, educating and screening our directors, employees, volunteers and contractors (including referees) to provide a child safe environment.
- Regularly reviewing and improving upon our Child Safety and Wellbeing program.

SEL has specific policies, procedures and training in place which supports its leadership team, employees, contractors and volunteers to achieve these commitments.

South East Leisure

Child Safety and Wellbeing Code of Conduct

SEL requires its employees to conduct themselves professionally and in a manner that reflects our commitment to child safety and wellbeing.

Clear expectations for appropriate behaviour with children are established in SEL's Code of Conduct. All SEL's employees, volunteers and contractors must agree to abide by SEL's Code of Conduct.
SEL will take appropriate disciplinary action against any employee, volunteer or contractor found to have contravened this Code or other related policies and procedures.

Training and Supervision

Training and education are important to ensure everyone at SEL understands that the safety of children and young people are everyone's responsibility.

SEL's culture aims for all employees, volunteers, and contractors (in addition to patrons, members, parents, guardians, carers and children/ young people) to feel confident and comfortable in discussing any allegations of abuse or safety concerns.

SEL educates its employees and volunteers to identify, assess and minimise risks of abuse of children and you people and, where employees work with children or young people, to detect potential signs of abuse.

SEL also supports employees and volunteers, including through ongoing supervision, to:

- develop their skills to identify and protect children and young people from abuse;
- promote the cultural safety of Aboriginal and Torres Strait Islander children and young people, the cultural safety of children and young people from a culturally and/or linguistically diverse backgrounds, children with disabilities and children who identify as LBGTQIA+;
- Understand their obligations to report any suspected, alleged or actual disclosures of child abuse.

New employees and volunteers will be supported to ensure they understand SEL's commitment to the safety of children and young people, and that everyone has a role to play in protecting children and vulnerable people from abuse. Our comprehensive induction module focusing on Child Safety must be completed as part of new team member onboarding. Appropriate work practices will be used to check that the behaviour of employees and volunteers towards children and young people is safe and appropriate.

Recruitment

SEL takes all reasonable steps to employ skilled people to work with children and young people. It develops selection criteria based on position descriptions and advertisements which clearly demonstrate SEL's commitment to the safety of children and young people and an awareness of its social and legislative responsibilities.

SEL actively encourages applications from Aboriginal and Torres Strait Islander peoples, people from culturally and/or linguistically diverse backgrounds, people with a disability and people from the LBGTQIA+ community. All appointments are based on merit.

All people engaged by SEL to perform work at SEL facilities, including volunteers, are required to hold and to provide evidence of a valid Working with Children Check. SEL carries out reference checks and police record checks to ensure that it is recruiting the right people.

Requirements of contractors and service providers

SEL requires any:

- contractors accessing SEL facilities and
- service providers using SEL facilities to provide activities for children and young people

to acknowledge and accept the SEL Child Safety and Wellbeing Policy and procedures. Further, SEL ensures all contractors and service providers performing work at SEL facilities hold and provide evidence of a valid Working with Children Check.

Incidents, disclosures and suspicions of Child Abuse

SEL is committed to hearing and acknowledging the voices of children and young people and their families. SEL has developed procedures and processes aimed at managing feedback and complaints that involve children and young people related to their safety.

SEL's '*Critical Actions when responding to incidents, disclosures and suspicions of Child Abuse*' procedure provides the reporting procedure and methods to deal with any allegation thoroughly and in a timely manner. Any incidents, disclosures or suspicions of abuse should be reported through appropriate channels, including internally within SEL and to the Department of Families, Fairness and Housing (DFFH) Child Protection and Victoria Police, depending on the severity and urgency of the matter. SEL employees must report all suspected child abuse incidents and allegations.

Any person employed by SEL who has engaged in inappropriate behaviour or unlawful conduct may be counselled or warned in accordance with SEL policies. Serious or persistent breaches can lead to formal disciplinary action up to and including dismissal.

Disciplinary action may also be taken against any person employed by SEL who makes a false

or vexatious complaint. However, no such action will be taken if a person raises a legitimate concern about alleged child abuse that is proven to be unfounded on investigation. If an allegation is made against a person not connected with SEL, then SEL will delegate suitable team members to implement an appropriate process, which may include reporting the allegations to Victoria Police or DFFH.

Reporting a Child Safety Concern

The safety of children and young people is everyone's responsibility. SEL encourages reporting of alleged child abuse and takes all allegations of child abuse seriously. This includes a person believing, on reasonable grounds, that a child or young person is in need of protection and the child/young person's parents are unable or unwilling to protect the child.

If you believe a child is at immediate risk of abuse or harm, phone 000.

If the concern is related to the conduct of a South East Leisure employee, volunteer, contractor, guest or anyone working in one of SEL's facilities, or if you wish to speak to our Child Safety team, please contact us by:

- Raising your concern with any SEL team member who is trained to manage and report the concern.
- Completing the form on the SEL Child Safety and Wellbeing webpage which will be sent directly to the child safety team at South East Leisure
- Telephoning SEL's customer service team on (03) 9767 3100 and asking to speak to the South East Leisure Child Safety officer.

SEL provides access to translation services for providing feedback or complaints. To access translation services please contact the Translating and Interpreting Service (TIS). Telephone 13 14 50 and ask to be put through to telephone number (03) 9767 3100.
The process for reporting a Child Safety Concern is also available in video format on the SEL Child Safety and Wellbeing webpage, to support children, young people and the community in their access to information in raising concerns.

All reports and allegations made to South East Leisure will be responded to in accordance with our legal obligations, including but not limited to:

- Victorian Child Safety Standards.
- Reportable Conduct Scheme
- Legislative requirements and mandatory reporting requirements
- SEL Code of Conduct
- SEL Performance Counselling and Discipline Policy
- SEL's Critical Actions when responding to incidents, disclosures and suspicions of Child Abuse procedure.

South East Leisure Child Safety Officer

SEL has a designated Child Safety Officer as the primary point of contact to provide advice and

support regarding the safety and wellbeing of children at SEL. Contact information for this role is tabled below.

Company Position	Email address
Health, Safety and Wellbeing Business Partner	childsafety@southeastleisure.com.au

Legislative responsibilities

SEL takes its legal responsibilities seriously, including the criminal offences of failure to disclose (which applies to all adults in Victoria) and failure to protect (which applies to relevant employees of SEL). In addition, any SEL employees or volunteers who are mandatory reporters must comply with their duties.

Fair procedures

As well as being concerned about the safety and wellbeing of children and young people, SEL also aims to be fair and just to its employees and volunteers. The decisions SEL makes when recruiting, assessing, or investigating alleged incidents and undertaking disciplinary action will always be thorough, transparent, and evidence based. The principles of procedural fairness and natural justice will be applied.

SEL will record all allegations of abuse and safety concerns. All records will be securely stored in confidential files, subject to the privacy and confidentiality parameters set out below.

If an allegation of abuse or a safety concern is raised, SEL will provide regular and timely updates (as appropriate) to relevant children, young people and/or families (as well as to the person who is alleged to have committed the abuse) on progress and actions taken by SEL. Support services will also be recommended and/ or coordinated.

Privacy and Confidentiality

SEL will respect the privacy of all individuals involved, whether they are members of our workforce, volunteers, parents/guardians/carers, children, or young people, unless there is a risk to someone's safety. Information should be treated as confidential and should only be used and disclosed on a need-to-know basis, with the consent of the individual or their authorised representative, or otherwise in accordance with law.

The SEL Incident Management system which is used to report and investigate Child Safety and Wellbeing matters includes safeguards and access control restrictions to ensure information is kept confidential and secure.

Risk Management

SEL has adopted a risk management approach to the development of its Child Safety Wellbeing Program. In addition to general occupational health and safety risks, SEL proactively manages

risks of abuse to children and young people. SEL has risk management strategies in place to identify, assess, and take steps to minimise abuse risks, which include risks posed by physical environments (for example, any rooms with doors that can lock), and online environments (for example, no employee and volunteer is to have contact with a child on social media unless necessary or appropriate in the course of their role with SEL).

Roles and Responsibilities

Role	Responsibility
All SEL Employees	Be aware of this policy and SEL's commitment to child safety and wellbeing. Apply the Child Safe Standards to their work. Take reasonable steps to protect children and young people from harm and abuse. Treat allegations, suspicions, incidents and disclosures of child abuse and harm seriously Notify and report any alleged or suspected harm or abuse through appropriate channels, including internally within SEL and to the Department of Families, Fairness and Housing (DFFH), Child Protection and Victoria Police, depending on the severity and urgency of the matter. Ask their manager questions, seeking training and support when unsure of their child safety responsibilities.
SEL Executive Management and Managers	Promote awareness of: • this policy • the SEL Code of Conduct Apply the Child Safe Standards to their work. Ensure team members feel safe to speak up about child safety. Hire suitable people to work with children and young people and screen them appropriately. Engage suitable suppliers in child-related work. Ensure team members are appropriately trained and supported in child safety responsibilities. Identify child safety risks through a child safety risk assessment. Act, report and record breaches of the this policy and SEL Code of Conduct and notify authorities where required by law.

Board of Directors	Provide strategic support and guidance of Child safety initiatives Ensure that appropriate resources are made available to allow SEL's Child Safety and Wellbeing Policy to be effectively implemented. Holding the CEO and Executive Team accountable for effective implementation. Maintain oversight of Child Safety practices within SEL through audits and regular reporting of any incidents.

Continuous Improvement and Policy Review

SEL takes responsibility for continuously improving the ways in which, in its operations it provides for the safety of children and young people and the prevention of abuse. SEL will review and improve this policy at least once every two years or following any significant incidents, changes in operating environment or developments in Child Safety best practices or legislation.

Version	Approved	Approved by	Amendment type	Review
1	June 2022	SEL Board	Development of new policy	June 2024
2	February 2025	SEL Board	Review and update to Policy	February 2027
3	November 2025		Updates following external audit with recommendations incorporated	February 2027

Appendix One – Definitions

Aboriginal and/or Torres Strait Islander	The term 'Aboriginal' is inclusive of Aboriginal and Torres Strait Islander peoples.
Child Abuse	All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the Child's health, survival, development or dignity in the context of a relationship with a person of responsibility, trust or power.-

Child Safe Standards	The 11 Victorian Child Safe Standards established under the *Child Wellbeing and Safety Act 2005 (Vic)*
Child/Young Person	A person who is under the age of 18 years
Children/young people from culturally and/or linguistically diverse backgrounds	A child or young person who identifies as having particular cultural or linguistic affiliations by virtue of their place of birth, ancestry or ethnic origin, religion, preferred language or language spoken at home or because of their parents' identification on a similar basis.
Cultural Safety for Aboriginal and Torres Strait Islander Children	Aboriginal and Torres Strait Islander children are given the opportunity to be connected to their culture and provided with a safe, nurturing and positive environment where they are comfortable with being themselves, expressing their culture, their spirituality and belief systems.
Emotional or Psychological abuse	Emotional abuse of a Child refers to an inappropriate verbal or symbolic act towards a Child and/or a pattern of failure overtime to provide a Child with adequate non-physical nurturing and emotional availability. Such acts of commission or omission are likely to damage a Child's self-esteem or social competence
Grooming	Grooming is a term used to describe what happens when a perpetrator of abuse builds a relationship and rapport with a child with a view to abusing them at some stage in the future. Grooming can also be used to describe the process that a perpetrator goes through when building rapport and a relationship with guardians of children, or people with the responsibility for the care of children and young people. Grooming can occur over any length of time, in a variety of settings where a relationship can be formed, such as leisure facilities, childcare, music, religious and sporting activities, internet chatrooms and social media, or by SMS.

Harm	Harm to a Child or Young Person, is any detrimental or harmful effect of a significant nature to the Child or Young Person's physical, psychological or emotional wellbeing. It does not matter how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect, sexual abuse or exploitation, a single act, omission or circumstance or a series or combination of acts, omissions or circumstances.
LGBTIAQ+	Children up to the age of 18 years who identify as lesbian, gay bisexual, transgender, intersex, queer/questioning, asexual and other terms that people use to describe their experiences of their gender, sexuality and psychological sex characteristics.
Mandatory Reporting	Mandatory reporting is the legal requirement for certain professional groups to report a reasonable belief of child physical or sexual abuse to child protection authorities. The following are mandatory reporters in Victoria: • registered medical practitioners • nurses • midwives • registered teachers and early childhood teachers • school principals • school counsellors • police officers • out of home care workers (excluding voluntary foster and kinship carers) • early childhood workers • youth justice workers • registered psychologists • people in religious ministry.
Neglect	Failing to meet a child's basic needs, such as providing adequate food, drink, shelter, clothing, supervision, hygiene and medical attention.
Reasonable belief	A reasonable belief is formed if a reasonable person in the same position would have formed the belief on the same grounds. You do not have to have proof or concrete evidence.

Reportable Conduct Scheme	A scheme administered by the Commission for Children and Young people (CCYP) that requires organisations to report to the commission within three business days, certain allegations of child abuse or misconduct towards children made against an employee, including volunteers. Reportable conduct covers: • Sexual misconduct or physical violence committed against, with or in the presence of a child. • Behaviour causing significant emotional or psychological harm. • Significant neglect of a child. • Sexual offences.
Sexual abuse	The involvement of a Child in sexual activity that they do not fully comprehend, is unable to give informed consent to, or for which the Child is not developmentally prepared, or else that violates the laws or social taboos of society. Children can be sexually abused by both adults and other Children who are – by virtue of their age or stage of development – in a position of responsibility, trust or power over the victim.