



**Progress the game, so everyone can share in its heritage and possibilities.**

## AFL Child Safeguarding and Wellbeing Policy

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Related Policies and Procedures	<ul style="list-style-type: none"><li>AFL Safeguarding Commitment Statement</li><li>AFL Safeguarding Children and Young People Code of Conduct</li><li>AFL Safeguarding Children and Young People Complaints and Reporting Procedure</li></ul>			



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## 1. PURPOSE

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

The purpose of this Policy is to:

- a) Provide a clear statement to all AFL People that the AFL has zero tolerance for child abuse and harm.
- b) Safeguard children and young people against different forms of child abuse and harm.
- c) Work towards an organisational culture of child safety and wellbeing within the AFL.
- d) Ensure that all AFL People are aware of their responsibilities for identifying possible child abuse and harm and for establishing controls and procedures for reducing the likelihood of such abuse and/or detecting such abuse when it occurs.
- e) Provide guidance to AFL People as to action that should be taken where they suspect any child abuse or harm within or outside of the AFL.
- f) Provide assurance that all suspected child abuse and harm will be reported and investigated as appropriate.

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

There may be exceptional situations where this Policy does not apply, for example, in an emergency situation. However, it is crucial that, where possible, AFL People seek authorisation from their Department General Manager or, if appropriate, a member of the Executive, prior to taking action that contravenes this Policy or advise their Department General Manager or, if appropriate, a member of the Executive, as soon as possible after any incident in which this Policy has not been followed.

## 2. DEFINITIONS

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

Term	Definition
<b>Adult</b>	A person eighteen years of age or older.
<b>AFL</b>	Australian Football League being the governing body for Australian Football, which conducts Australian Football competitions throughout Australia.
<b>AFL People</b>	The following persons associated with the AFL and/or AFL State Entities: All employees (including casuals); and All directly engaged volunteers and contractors / consultants who are engaged to provide services to the AFL or an AFL State Entity that involve an interaction with Children or Young People.
<b>AFL State Entities</b>	The State entities controlled by the AFL being: <ul style="list-style-type: none"><li>• AFL (NSW/ACT) Commission Limited;</li><li>• AFL Northern Territory Limited;</li><li>• AFL Queensland Limited;</li><li>• Football Tasmania Limited; and</li><li>• Australian Football League (Victoria) Limited.</li></ul>

Term	Definition
<b>Bullying</b>	<p>Bullying involves the inappropriate use of power by one or more persons over another less powerful person and is generally an act that is repeated over time and is intended to cause distress and risk to a person's wellbeing. Bullying has been described by researchers as taking many forms which are often interrelated, and may include:</p> <ul style="list-style-type: none"> <li>• <i>Verbal</i> (name calling, put downs, threats);</li> <li>• <i>Physical</i> (hitting, punching, kicking, scratching, tripping, spitting);</li> <li>• <i>Social</i> (ignoring, excluding, ostracising, alienating); and/or</li> <li>• <i>Psychological</i> (spreading rumours, stalking, dirty looks, hiding or damaging possessions);</li> <li>• <i>Cyberbullying</i> (any sustained name calling, put downs, campaigns of harassment or trolling in an online environment).</li> </ul>
<b>Children and Young People</b>	<p>People under the age of eighteen years. Child or Young Person shall mean a single person falling within the definition of Children and Young People.</p>
<b>Child abuse</b>	<p>Child abuse includes all forms of physical abuse, emotional or psychological abuse, sexual abuse, sexual exploitation, neglect or negligent treatment, grooming, commercial (e.g. for financial gain) exploitation, exposure to family violence, harassing behaviour such as bullying or other exploitation of a Child or Young Person and includes any actions that results in actual or potential harm to a Child or Young Person. Child abuse can be a single incident but usually takes place over time.</p>
<b>Child Safe Standards</b>	<p>The (Victorian) Child Safe Standards are a set of legislated outcome-based Standards that require organisations providing services, programs and/or facilities to children and young people to comply with. The Child Safe Standards (Standards) aim to support organisations in developing practices that prevent and improve responses to allegations of child abuse and support the safety and wellbeing of children and young people by embedding safeguarding practices into everyday thinking. It is the policy of the AFL and its State Entities to comply with the requirements of these Standards.</p>
<b>Contractor</b>	<p>Any person or organisation engaged to provide services for, or on behalf of, the AFL or any of its subsidiaries. This includes agents, advisers, and subcontractors of the AFL or an AFL State Entity and employees, officers, volunteers, and agents of a Contractor or subcontractor.</p>
<b>Cultural Safety</b>	<p>Cultural Safety is an environment where individuals can express their identity in the form they choose without any concerns. Having a culturally safe space acknowledges differences and similarities across cultural values, spirituality connections, family networks, community dynamics and enables shared respect for all individuals.</p>
<b>Department General Manager</b>	<p>Department General Manager means a member of staff responsible for the management of a department or a function. The role will typically have 'General Manager' in the title and report directly to an Executive.</p>
<b>Emotional or psychological abuse</b>	<p>Emotional or psychological abuse occurs when a Child or Young Person does not receive the love, affection or attention they need for healthy emotional, psychological and social development. Such abuse may involve repeated rejection or threats to a Child or Young Person. Exposure to family violence can also impact the emotional and psychological wellbeing of a Child or Young Person. Constant criticism, teasing, ignoring, singling out (pointing out), threatening, yelling, scapegoating, ridicule and rejection or continual coldness are</p>

Term	Definition
	all examples of emotional abuse. These behaviours can result in significant damage to the Child's or Young Person's physical, intellectual or emotional wellbeing and development.
<b>Employee</b>	A person employed by the AFL or any of its subsidiaries.
<b>Executive</b>	Executive means a member of staff with executive responsibility for a department reporting to the AFL Chief Executive Officer.
<b>Family violence</b>	Family violence occurs when Children or Young People are forced to live with violence between adults in their home. It is violence between members of a family, or extended family, or those fulfilling the role of family in a Child or Young Person's life. It can include witnessing violence or the consequences of violence. Exposure to family violence places Children and Young People at increased risk of physical injury and harm and has a significant impact on their wellbeing and development.
<b>Grooming</b>	Grooming means behaviours that manipulate or control a Child/Young Person, their family, guardian and carers or other support networks, or organisations, with the intention to gain access to the Child/Young Person, obtain the Child/Young Person's compliance, maintain the Child/Young Person's silence, and avoid discovery of sexual abuse.
<b>Harm</b>	Harm to a Child or Young Person is any detrimental effect of a significant nature on a Child's or Young Person's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by: <ul style="list-style-type: none"> <li>• emotional or psychological abuse, physical abuse or neglect;</li> <li>• sexual abuse;</li> <li>• a single act, omission or circumstance; and</li> <li>• a series or combination of acts, omissions or circumstances.</li> </ul>
<b>Harassment</b>	Any type of behaviour towards a person that they do not want and is offensive, abusive, belittling, or threatening and is reasonably likely to cause harm to the person who is the subject of harassment. Sexual harassment includes unwanted or unwelcome sexual behaviour towards a person which may make them feel offended, humiliated or intimidated.
<b>LGBTIQ+</b>	Acronym for Lesbian, Gay, Bisexual, Transgender, Intersex, Queer and/or Questioning.
<b>Misconduct with a Child or Young Person</b>	Any behaviour involving a Child or Young Person that is objectively age inappropriate and/or places the Child or Young Person at risk of harm.
<b>Neglect</b>	Neglect is the persistent failure or deliberate denial to provide a Child or Young Person with the basic necessities of life. Such neglect includes the failure to provide adequate food, clothing, shelter, adequate supervision, clean water or medical attention to the extent that the Child's or Young Person's health and development is, or is likely to be, significantly harmed. Categories of neglect include physical neglect, medical neglect, abandonment or desertion, emotional and educational neglect. In the context of a sporting environment, it may involve an adult being aware that a Child or Young Person is at risk of abuse and not reporting these concerns to authorities.
<b>Non-binary</b>	This is an umbrella term for any number of gender identities that sit within, outside of, across or between the spectrum of the male and female binary. A non-binary person might identify as gender fluid, trans masculine, trans feminine, agender or bigender.

Term	Definition
	A non-binary person may or may not use the gender-neutral pronouns of 'they' and 'them'.
<b>Person in a Position of Authority</b>	Person in Position of Authority means a person, regardless of age, who through their position or involvement in Australian football can exercise power, control or influence over a Child/Young Person.
<b>Physical abuse</b>	Physical abuse occurs when a person subjects a Child or Young Person to non-accidental physically aggressive acts. The abuser may inflict an injury intentionally or inadvertently as a result of physical punishment or the aggressive treatment of a Child or Young Person. Physically abusive behaviour includes (but is not limited to) shoving, hitting, slapping, shaking, throwing, punching, biting, burning, kicking and excessive and physically harmful over-training. It also includes giving Children or Young People harmful substances such as drugs, alcohol or poison. Certain types of punishment, whilst not causing injury, can also be considered physical abuse if they place a Child or Young Person at risk of being hurt.
<b>Prohibited Conduct</b>	Conduct prescribed in Clause 10 of this Policy.
<b>Protected Characteristics</b>	<p>Protected Characteristic means:</p> <ul style="list-style-type: none"> <li>• Age;</li> <li>• Disability;</li> <li>• Race or ethnicity;</li> <li>• Sex or gender identity;</li> <li>• Sexual orientation; or</li> <li>• Religion.</li> </ul>
<b>Safeguarding Children and Young People Code of Conduct</b>	The Safeguarding Children and Young People Code of Conduct outlines what is, and what is not, acceptable behaviour or practice when working with or engaging with Children and Young People as further detailed in this Policy.
<b>Sexual abuse</b>	Sexual abuse is any act which exposes a Child or Young Person to, or involves a Child or Young Person in, sexual processes beyond their understanding or contrary to accepted community standards. Perpetrators of sexual abuse take advantage of their power, authority or position over the Child or Young Person for their own benefit. It can include making sexual comments to a Child or Young Person, engaging Children or Young People to participate in sexual conversations over the internet or on social media, kissing, touching a Child's or Young Person's genitals or breasts, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object. It can involve undertaking sexual acts in the presence of a Child or Young Person or forcing them to watch such acts. Voyeurism, exhibitionism, and exposing a Child or Young Person to pornographic magazines, websites and videos, or involving them in pornography and Sexual Exploitation are also considered forms of sexual abuse.
<b>Sexual exploitation</b>	Sexual exploitation is a form of sexual abuse and occurs when a Child or Young Person is forced into sexual activities that are then unlawfully recorded in some way without the consent of one or more parties and/or used to produce child sexual abuse material. Such material can be in the form of actual photos or videos, whether published or circulated on the internet or social media. Exploitation can also involve a Child or Young Person who is forced into prostitution. Encouraging a child to view pornographic videos, websites, or images, or engaging a child to participate in sexual conversations over social media or otherwise is also considered sexual exploitation.

Term	Definition
<b>Transgender</b>	Someone whose gender does not exclusively align with the one they were assigned at birth. Transgender relates to a person's gender, not their sexual orientation.
<b>Unlawful discrimination</b>	<p>Includes both:</p> <ul style="list-style-type: none"> <li>direct discrimination such as treating a Child or Young Person less favourably than other people or groups because of personal characteristics; and</li> <li>indirect discrimination when an unreasonable rule or policy applies to everyone but has the effect of disadvantaging some people because of personal characteristics they share, where such personal characteristics is protected by applicable anti-discrimination legislation</li> </ul>
<b>Victimisation</b>	Victimisation means subjecting a person, or threatening to subject a person, either in-person or online, to any unfair treatment because the person has made, or intends to pursue their right to make, a complaint, report or lawful disclosure, including under applicable legislation or this Policy, or for supporting another person to take such action.
<b>Vilification</b>	A public act, conduct or behaviour that incites hatred, serious contempt for, or revulsion or severe ridicule of, a person or group of people because of a particular characteristic they hold, as covered by applicable legislation, including their race, religion, identifying as homosexual, transgender or non-binary.
<b>Vicarious trauma</b>	The experience of trauma symptoms that can result from being repeatedly exposed to other people's trauma and their stories of traumatic events.
<b>Volunteer</b>	A person engaged by the AFL or an AFL State Entity in any capacity who is not otherwise an employee or contractor, including parents or carers that volunteer, directors, coaches, officials, administrators and team and support personnel.
<b>Wellbeing</b>	<p>Wellbeing encompasses the health of the whole Child and Young Person – physical, mental, social, spiritual and emotional.</p> <p>Social and Emotional Wellbeing of Aboriginal and Torres Strait Islander Children and Young People includes the connection Aboriginal and Torres Strait Islander Children and Young People have to self, family, community, culture, spirituality, and land/sea which are vital aspects of their wellbeing. It also acknowledges the impact that colonization continues to have on this population groups' health and wellbeing.</p>
<b>Working with Children Check (WWCC)</b>	A Working with Children Check (however named) under the applicable legislation of a state or territory of Australia. State and territory specific details can be found here: <a href="https://aifs.gov.au/resources/resource-sheets/pre-employment-and-volunteer-screening-checks">https://aifs.gov.au/resources/resource-sheets/pre-employment-and-volunteer-screening-checks</a> .

### 3. SUPPORTING DOCUMENTS

This Policy should be read in conjunction with and is supported by the AFL's Commitment Statement to Safeguarding Children and Young People (approved by the AFL Commission), Safeguarding Children and Young People Code of Conduct and Safeguarding Children and Young People Complaints and Reporting Procedure (Supporting Documents). This Policy and the Supporting Documents are available on the AFL website at: <https://www.afl.com.au/policies>

#### **4. SCOPE**

This Policy applies to the AFL and the AFL State Entities and all AFL People as follows:

- AFL and AFL State Entity employees (including casuals); and
- AFL and AFL State Entity directly engaged volunteers and contractors/consultants, who are engaged to provide services to the AFL and/or an AFL State Entity that involve an interaction with Children or Young People.

Whilst the Policy does not apply to AFL clubs, or State or community football leagues and clubs, the AFL is committed to supporting such bodies to understand their obligations in relation to safeguarding children and young people primarily through leadership and providing relevant resources.

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

All children and young people, regardless of their gender, race, religious beliefs, age, disability, sexual orientation, or family or social background, have the right to feel safe and be free from any harm or abuse. The AFL is committed to promoting and protecting the safety and wellbeing of all children and young people in our care who access AFL activities, programs, services or facilities, by fostering a culturally safe environment where children and young people feel safe and welcome.

As part of the AFL's commitment to safeguarding children and young people, the AFL commits to the following:

- The AFL has zero tolerance for child abuse.
- The AFL will seek to provide an environment in which all children and young people feel supported and respected.
- The AFL recognises the needs of Aboriginal and Torres Strait Islander children and young people, children and young people from culturally and/or linguistically diverse backgrounds, children and young people with a disability and children and young people who identify as LGBTI+, transgender and/or non-binary and will implement culturally appropriate practices and procedures to address those needs.
- The AFL supports the active participation of children and young people and welcomes the opinions of children, young people and their families to inform the development and update of policies and procedures in relation to matters affecting the safety and wellbeing of children and young people.
- The AFL will engage with children and young people and their parents/carers about safeguarding practices and help empower them to speak up when they see or hear something that makes them feel unsafe. This will be achieved through the provision of relevant information through appropriate resources which are readily available and accessible to children, young people and their parents/carers.
- In the event a concern or allegation is raised in relation to child abuse or any other inappropriate behaviour towards a child or young person that has occurred while a child or young person is under the AFL's care, the AFL will ensure it is treated seriously, in a culturally sensitive manner and fully investigated in accordance with this Policy, the Supporting Documents, any other related policies or procedures and relevant legislation.
- The AFL will actively promote the safety of children and young people throughout the Australian Football community, whilst recognising the need for state and local football leagues and clubs that are not under the AFL's direct control to take responsibility for providing a safe physical and online environment for children and young people in their care.

#### **6. RESPONSIBILITIES WITHIN THE AFL**

Child safeguarding is a shared responsibility of all AFL People.

All AFL People must ensure that they understand their roles and responsibilities in respect of the protection of children and young people as set out in this Policy including reporting information about suspected child abuse and/or harm. Failure to report information about suspected child abuse and/or harm is prohibited conduct, particularly in relation to Position of Authority roles. The Position of Authority requirements are mandated under state and territory legislation. Non-compliance could result in criminal convictions under the relevant laws.

A summary of the responsibilities of key groups of AFL People is set out below. Failure to meet the responsibilities of the roles as set out below would be considered a breach of this Policy.

Entity	Role/Responsibility
<b>AFL Commission / Executive</b>	<ul style="list-style-type: none"> <li>Endorse appropriate policies and procedures relating to Children and Young People's safety and wellbeing.</li> <li>Promote the AFL's commitment to safeguarding Children and Young People as set out in this Policy.</li> <li>Ensure adequate resources are allocated to allow for the effective implementation of this Policy and the Supporting Documents.</li> <li>Support review of this Policy and the Supporting Documents on at least an annual cycle, or at a time governed by legislation, regulations, or organisational learnings.</li> <li>Assist in creating and maintaining a child safe culture and a culture of inclusion.</li> <li>Advocate and promote Children and Young People's right to be heard and participate in decisions made about them.</li> </ul>
<b>AFL State Entity Heads and AFL General Managers</b>	<ul style="list-style-type: none"> <li>Ensure all AFL People engaged by the AFL State Entity or the AFL (as applicable) understand their obligations under this Policy and the Supporting Documents.</li> <li>Oversee the implementation of this Policy by all AFL People engaged by the AFL State Entity or the AFL (as applicable).</li> <li>Ensure adequate resources are allocated to allow effective implementation of this Policy by AFL People engaged by the AFL State Entity or the AFL (as applicable).</li> <li>Assist in creating and maintaining a child safe culture and a culture of inclusion.</li> <li>Provide support to AFL People in any decision of an AFL Person to initiate any form of action to protect a Child or Young Person from child abuse or harm.</li> <li>To the extent relevant to the individual's role, support and guide community football bodies (Leagues, Associations and Commissions) to understand their obligations regarding safeguarding Children and Young People through communication and providing relevant resources to them.</li> <li>Ensure AFL People engaged by the AFL State Entity or the AFL (as applicable) that may be involved in a matter relating to the safety and wellbeing of a Child or Young Person are referred to appropriate supports, such as counselling and formal debriefing.</li> <li>Advocate and promote Children and Young People's rights to be heard and the right for Children, Young People and their families to participate in decisions made about them.</li> <li>Create opportunities for regular discussion at all levels to support a culture of continuous improvement and accountability for child safeguarding and wellbeing.</li> <li>Ensure that AFL People engaged by the AFL State Entity or the AFL (as applicable) are aware of the appropriate recruitment, screening and employment/engagement practices in relation to individuals with specific roles</li> </ul>

Entity	Role/Responsibility
	<p>in working, coaching, umpiring or volunteering with Children and Young People and their families.</p> <ul style="list-style-type: none"> <li>• Be familiar with the types of child abuse and harm that might occur within their area of responsibility and be alert for any indications of such conduct.</li> </ul>
<b>AFL and AFL State Entity employees, volunteers and contractors/consultants (directly engaged)</b>	<ul style="list-style-type: none"> <li>• Maintain a full understanding of the commitments and expectations in relation to safeguarding Children and Young People as set out in this Policy and the supporting documents.</li> <li>• Undertake any required induction and training relevant to safeguarding Children and Young People.</li> <li>• Seek guidance from Department General Manager or other appropriate AFL personnel if there is a lack of understanding in relation to the commitments and expectations as set out in this Policy and the Supporting Documents.</li> <li>• Take the appropriate action to protect Children and Young People from all forms of child abuse and any other forms of inappropriate behaviour.</li> <li>• Assist in creating and maintaining a child safe culture and a culture of inclusion.</li> <li>• Report any concerns or evidence in regard to the safety of Children and Young People in the organisation through the appropriate reporting channels as set out in the AFL Safeguarding Children and Young People Complaints and Reporting Procedures and the other Supporting Documents.</li> <li>• Adopt the practices and behaviour set by this Policy as standard when carrying out their roles.</li> </ul>
<b>AFL Integrity &amp; Security Department</b>	<ul style="list-style-type: none"> <li>• Investigate and take appropriate action in respect of any report received in relation to an AFL Person breaching this Policy or any other AFL policy relevant to safeguarding Children and Young People.</li> <li>• Investigate and take appropriate action in respect of any report in relation to child safety or child abuse or any other inappropriate behaviour in accordance with the AFL Safeguarding Children and Young People Complaints and Reporting Procedures.</li> <li>• Provide guidance, support and advice to all AFL People in relation to concerns about a Child's or Young Person's safety or wellbeing.</li> <li>• Act as a key contact for queries, comments or concerns raised by AFL People in relation to safeguarding Children and Young People from child abuse and other inappropriate behaviour.</li> <li>• Review reports in relation to investigations conducted under this Policy and provide feedback to appropriate AFL People including the AFL safeguarding committee on a monthly basis.</li> </ul>
<b>AFL People Department</b>	<ul style="list-style-type: none"> <li>• Cooperate with the AFL Security and Integrity Department in respect of any investigations relating to this Policy, the Supporting Documents and any other related safeguarding Children and Young People policies and procedures.</li> <li>• Take appropriate action in respect of any AFL People found to be in breach of this Policy, the Supporting Documents and any related safeguarding Children and Young People policies and procedures (which may include dismissal).</li> </ul>
<b>AFL Mental Health and Wellbeing team</b>	<ul style="list-style-type: none"> <li>• Provide advice and counsel to the AFL Child Safeguarding Steering Committee and Safeguarding Manager regarding issues of child safety where wellbeing of a Child or Young Person is involved.</li> <li>• Contribute towards adherence with the new legislative requirements detailing wellbeing of children and young people.</li> <li>• Create systems of wellbeing in relevant AFL programs, contributing to safe and inclusive environments.</li> <li>• Collaborate on youth advisory initiatives.</li> </ul>
<b>Safeguarding Manager</b>	<ul style="list-style-type: none"> <li>• Provide specialist procedural advice and assistance across the AFL on child protection and safeguarding matters.</li> </ul>

Entity	Role/Responsibility
	<ul style="list-style-type: none"> <li>• Embed a strong compliance and risk mitigation culture across all programs and services delivered to Children and Young People.</li> <li>• Develop guidance materials to support AFL People's understanding and adherence to child safe practices.</li> <li>• Review and update the AFL Safeguarding Policy and Supporting Documents.</li> <li>• Act as the main contact for AFL State Entity related safeguarding queries.</li> <li>• Develop and deliver education initiatives on safeguarding matters to all AFL People and community.</li> <li>• Provide leadership on safeguarding to State and Territory leagues and clubs.</li> </ul>
<b>AFL Child Safeguarding Steering Committee</b>	<ul style="list-style-type: none"> <li>• Oversee effective ongoing implementation of Child and Young Person safeguarding practices in relation to Children and Young People engaged in AFL programs, services, activities and/or use AFL facilities.</li> <li>• Oversee a review of the AFL Safeguarding Policy and the Supporting Documents on at least an annual basis.</li> <li>• Contribute to the AFL's child safeguarding strategy and monitor, track progress and review the strategy and implementation plan as needed.</li> <li>• Promote the work of child safeguarding throughout the organisation and help identify and build strategic relations between child safeguarding and relevant areas of the business.</li> <li>• Participate in the development, dissemination and review of an annual self-assessment audit of the AFL's organisational compliance with the Child Safe Standards.</li> <li>• Provide support and advice in relation to complaint handling as necessary.</li> <li>• Input to risk management plans including identification of risks and mitigation controls</li> <li>• Ensure the voice of the child is heard and given opportunities to contribute where appropriate.</li> <li>• Support AFL People and AFL State Entities to engage openly with Children, Young People and families about AFL policies and the AFL's child safeguarding approach, including receiving input and feedback on the effectiveness of the approach.</li> <li>• Communicate to Executive level the child safeguarding strategy and implementation plan with regular updates on progress and activities.</li> </ul>

## 7. RECRUITMENT AND PRE-EMPLOYMENT SCREENING

The AFL is committed to implementing recruitment and screening practices that prioritise the safety of children and young people from child abuse and harm. AFL recruitment and screening practices must identify the most suitable people for positions who share the AFL's commitment to protecting the safety and wellbeing of children and young people. The AFL requires all AFL employees to pass through its recruitment and screening processes prior to commencing their engagement with the AFL. The AFL's recruitment and screening practices include:

- Clear position descriptions are provided that state relevant safeguarding requirements;
- Communication of this Policy and the commitments described to potential applicants for positions;
- Holding face-to-face interviews (or via videoconference platforms), which include safeguarding-related questions;
- Verbally obtaining two professional reference checks for all potential employees and two suitable reference checks for volunteer positions;
- Undertaking the relevant screening checks (specific to the role), which may include identity, criminal record, Working with Children Checks (all AFL employees must hold an employee Working with Children Check) and qualification checks;

- As soon as reasonably practicable following engagement, a requirement that AFL employees review and acknowledge their understanding of this Policy; and
- Once engaged, a requirement that all new AFL employees participate in an induction program, which will provide them with further information about our commitment to safeguarding children and young people.

The AFL requires all AFL employees to successfully obtain, maintain and evidence for the duration of their employment or other engagement, a valid Working with Children Check and/or a satisfactory police background check.

The AFL may at any time request satisfactory evidence of either or both of a Working with Children Check or a satisfactory police background check. If an individual is unable to or does not obtain a Working with Children Check or satisfactory police background check, or for whatever reason is unable to maintain a Working with Children Check or current satisfactory police background check at any time, AFL may take action up to and including the termination of their employment or engagement.

The AFL requires AFL employees to disclose investigations, convictions or charges affecting their suitability to engage with children and young people to the AFL People Department and reviews police checks and Working with Children Checks on a regular, ongoing basis.

Due to the nature of our work, we apply a minimum age policy of 18 years for employees at the AFL. This ensures we provide a safe work environment for our employees, as well as children and young people who are involved in our programs, services and facilities. Exceptions to this Policy must be approved by the Executive General Manager People.

## **8. CREATING CULTURALLY SAFE ENVIRONMENTS FOR ABORIGINAL AND TORRES STRAIT ISLANDER CHILDREN, YOUNG PEOPLE AND THEIR FAMILIES**

The AFL is committed to creating environments where Aboriginal and Torres Strait Islander culture is acknowledged and appreciated, and Aboriginal and Torres Strait Islander children, young people, their families and community members feel safe and included.

The AFL will:

- Promote a Welcome to Country and/or an Acknowledgement of Country for significant meetings and formal events to show respect to the importance of Aboriginal and Torres Strait Islander cultural traditions;
- Implement the AFL Reconciliation Action Plan to celebrate the important steps taken in creating a positive cultural environment;
- Consult with families and members of Aboriginal and Torres Strait Islander communities to identify opportunities to promote culture and practices through its AFL programs;
- Provide opportunities for Aboriginal and Torres Strait Islander children and young people to share their cultural identity and express their culture through AFL programs;
- Adopt a social and emotional wellbeing approach towards Aboriginal and Torres Strait Islander children, young people and communities;
- Provide training for staff on the strengths of Aboriginal and Torres Strait Islander culture and its importance to the wellbeing and safety of Aboriginal and Torres Strait Islander children and young people;
- Celebrate and acknowledge days of cultural significance;
- Seek feedback from Aboriginal and Torres Strait Islander children, young people, families and communities on their experiences of AFL programs, particularly how safe they feel expressing their culture; and
- Take a zero-tolerance approach to racism and act on any incidents of racism or other forms of unlawful discrimination promptly.

## **9. CHILD SAFE PRACTICES AND REQUIREMENTS**

This Policy addresses the major areas where interaction occurs with the children and young people who take part in any AFL activities, programs, services or facilities. This Policy also imposes an obligation on AFL People who organise such activities, programs, services or facilities to identify where risks to safeguarding of children and young people may arise and adopt control measures to properly manage those risks (see further at section 10) of this Policy.

### **9.1 Sexual misconduct**

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

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

- 'contact behaviour', such as sexual intercourse, kissing, fondling, sexual penetration or exploiting a child through prostitution; and
- 'non-contact behaviour', such as flirting, sexual innuendo, sexual harassment, inappropriate text messaging/sharing of images, sexual conduct in the presence of a minor, inappropriate photography or exposure to pornography or nudity.

### **9.2 Grooming**

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

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

Perpetrators will seek to build a trusting relationship with a child, young person and/or their family and/or act to isolate the child or young person to abuse them.

Grooming in online environments has become more prevalent in recent years with the increase in online communication. Online grooming can occur quickly with children or young people being persuaded to participate in sexual activity on webcams or exchanging sexual images (nudes).

AFL People are strictly prohibited from engaging in any conduct that may reasonably be considered to be of the nature of grooming or in any way exploitative of the power imbalance that may exist in relationships with children and young people.

### **9.3 Peer-to-Peer abuse**

The AFL acknowledges that child abuse or harm can occur through peer-to-peer interactions and may include behaviours ranging from harassment and bullying to sexual contact. If AFL People become aware

of or witness any peer-to-peer abuse (for example, bullying, harassment, physical fights) they should act to stop it immediately. If the behaviour persists, AFL people must take steps to protect the abused child or young person. Parents and carers should be contacted and informed about any peer-to-peer abuse and how it will be managed.

All identified or suspected peer-to-peer abuse that may be of criminal nature must be reported to the Police and the AFL Integrity & Security Department.

#### **9.4 Positive guidance**

The AFL strives to ensure that children and young people participating in any AFL activities, programs, services or facilities are aware of the acceptable limits of their behaviour so that we can provide a positive and safe experience for all participants.

Wherever possible, children and young people are encouraged to 'have a say' and participate in all relevant organisational activities and decision making in relation to those activities, especially on issues that are important to them. Children, young people and their families are to be given access to relevant information to assist them in their involvement, including about the AFL's safeguarding approach.

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

- an effective and positive environment; and
- the safety and/or wellbeing of children and young people and/or AFL People participating in AFL programs, services or using AFL facilities.

AFL People are required to use behaviour management strategies that are fair, respectful and appropriate to the developmental stage of the children or young people involved. The child or young person needs to be provided with clear directions and given an opportunity to redirect any misbehaviour in a positive manner.

Under no circumstances are AFL People to take disciplinary action involving physical punishment or any form of treatment that could reasonably be considered as degrading, cruel, frightening or humiliating. Please refer to section 9.12 of this Policy for further information on when an AFL Person may make physical contact with a child or young person when carrying out a behaviour management strategy.

#### **9.5 Promoting equity and diversity**

All AFL People must ensure that their approach and interactions with children and young people are sensitive, respectful and inclusive of all backgrounds and abilities. In particular, AFL People are expected to:

- promote the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander children and young people (for example, by never questioning a child's self-identification);
- promote the cultural safety, participation and empowerment of children and young people with culturally and/or linguistically diverse backgrounds (for example, by translating our children, young persons and family resources into multiple languages to ensure accessibility and by having zero tolerance of discrimination);
- promote the safety, participation and empowerment of children and young people with a disability (for example, by ensuring children and young people have appropriate access to AFL programs, services and facilities); and
- promote the safety, participation and empowerment of children and young people who identify as LGBTI+, transgender or non-binary (for example, supporting the right for trans children to participate in the team of their preferred gender).

#### **9.6 Adhering to professional role boundaries**

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

Without express authorisation from a Department General Manager or person delegated with their authority, all AFL People **should not**:

- provide unauthorised transportation, for example, giving children or young people lifts in their car to an activity without consent from a parent or carer (see section 9.16 below);
- engage in activities with children or young people who are participants in or members of our programs or organisation outside AFL activities, programs or services;
- provide support to a child or young person, or their family, unrelated to AFL activities, programs or services; for example, tutoring, financial support, babysitting or providing accommodation;
- seek contact with children or young people (or former participants) outside AFL programs, activities or services, including through social media platforms or by phone;
- where there is no existing social, personal or family relationship prior to engaging in AFL services, accept an invitation to attend any private social function at the request of a child or young person who has participated, or is participating, in any AFL program, activity or service – or at the request of their family (for example, graduation ceremony);
- develop any ‘special’ relationships with children or young people that could be seen as favouritism, such as the offering of gifts, special treatment or singling specific children or young people out, or being secretive with relationships;
- engage in open discussions of a mature or adult nature with or in the presence of children or young people; or
- discriminate against a child or young person on the basis of gender, race, religious beliefs, age, disability, sexual orientation, family or social background.

If an AFL Person’s position description or similar document does not expressly grant that AFL Person the right to do any of the above, such authorisation may not be inferred and instead the AFL Person must seek express authorisation from their Department General Manager or person delegated with their authority to do any of the above.

Any AFL Person that becomes aware of a situation in which a child or young person requires assistance that is beyond the confines of that person’s role, or beyond the scope of usual services, they should at the earliest opportunity:

- contact the child or young person’s parent or carer to discuss;
- seek advice from their Department General Manager or person delegated with their authority; and/or
- refer the matter to an appropriate support agency (for example, Child Protection).

## **9.7 Use of language and tone of voice**

AFL People should use language and tone of voice in the presence of children and young people that:

- provides clear direction, boosts their confidence and encourages and affirms them;
- is not abusive or harmful to children or young people;
- does not include language that is:
  - discriminatory, racist, homophobic or sexist or in any way vilifies a child or young person;
  - derogatory, belittling or negative, for example, by calling out a child’s behaviour in front of other team mates, by calling a child a ‘loser’ or telling them they are ‘too fat’;
  - intended to threaten, intimidate or frighten, for example, finger pointing or getting in a child or young person’s personal space; or
  - profane or sexual in nature.

These examples are all types of verbal abuse. Any language that is used to intimidate, frighten or control a child or young person or is thought to ‘toughen them up’ is never justifiable. Any form of verbal abuse and use of inappropriate language can affect a child or young person’s self-esteem and may cause them to lose interest in participating in Australian Football.

## **9.8 Supervision**

AFL People are responsible for supervising children and young people participating in an AFL program, activity or service to ensure those participants:

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

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

## **9.9 Use of electronic and online communications**

Where possible, all email, text messages and other forms of messages sent to a child or young person should be copied to their parent or carer.

Where a parent or carer is not included in a communication between an AFL Person and a child or young person, the AFL Person must:

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

All AFL People are required to adhere to the AFL Social Media Policy.

AFL People are required to report to the AFL Integrity & Security Department if they become aware of any children or young people who may have been placed at risk of abuse or exploitation via social networking sites, text messaging, gaming sites or through web searches, or inappropriate email communication.

## **9.10 Photographs, filming or livestreaming of children and young people**

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

- children and young people are to be photographed, filmed or part of livestreaming while involved in an AFL program, activity or service only if:
  - consent is obtained from the child’s or young person’s parent or carer;
  - the child or young person consents to being photographed, filmed or livestreamed;
  - the context is directly related to participation in the program, activity or service;
  - the child or young person is appropriately dressed and posed; and
  - the image is taken in the presence of other AFL People where possible.

- If a child or young person does not wish to be photographed, filmed or livestreamed or a child or young person's parent or carer has not provided permission for the child or young person to be photographed, filmed or livestreamed, the child or young person is not to be singled out or made to feel purposely excluded.
- Images are not to be distributed (including as an attachment to an email) to anyone other than the child or young person photographed without the relevant Department General Manager's or a person delegated with their authority's knowledge and approval.
- Where photography is permitted and where practicable, AFL People should use a work device rather than a personal device (phone, camera, etc) to photograph, film or livestream children and young people.
- Photographs, films or livestreaming should not be taken or conducted in the presence of or whilst children or young people are getting dressed.
- Images are to be stored in a manner that prevents unauthorised access and should be destroyed or deleted as soon as practicable after they are no longer required subject to any IT data storage processes.
- AFL People must comply with the AFL's Privacy Policy in relation to holding and disclosing images and any other personal information. In particular, AFL People should inform a child's or young person's parent or carer about the nature of the use of the image(s) as well as how the image(s) will be stored and how the image(s) can be accessed by the parent or carer.

### **9.11 Giving gifts**

AFL People may only give a gift to a child or young person engaged in an AFL program, activity or service when:

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

### **9.12 Physical contact with children and young people**

Any physical contact with children and young people must be appropriate to the delivery of the program, activity or service, such as assisting with skill learning, and based on the needs of the child or young person. Where physical contact is appropriate (for example, a coach demonstrating a safe tackling technique) children and young people should always be asked if they consent to physical contact.

Under no circumstances should any AFL People have contact with children or young people participating in our program or activity that:

- involves touching of:
  - genitals;
  - buttocks; or
  - the breast area,
- other than as part of delivering medical or allied health services by a medical professional (in an emergency situation where a child or young person may not be able to consent) or in the process of administering first aid (however, where possible, consent should always be sought before making physical contact);
- would appear to a reasonable observer to have a sexual connotation;
- is intended to cause pain or distress to the child or young person (e.g. physical punishment);
- is overly physical (e.g. wrestling, horseplay, tickling or other roughhousing);
- is unnecessary (e.g. assisting with toileting when a child does not require assistance);
- is initiated against the wishes of the child or young person, except if such contact may be necessary to prevent injury to the child or young person or to others, in which case:

- physical restraint should be a last resort;
- the level of force used must be appropriate to the specific circumstances, and aimed solely at restraining the child or young person to prevent harm to themselves or others; and
- the incident must be reported to the AFL Integrity and Security Department and the child or young person's parent or carer as soon as possible.

All AFL People are required to report to the AFL Integrity and Security Department as soon as possible any physical contact initiated by a child or young person (whether directed to another child or young person, to an AFL Person or any other person) that is sexual and/or inappropriate, for example, acts of physical aggression, to enable the situation to be managed in the interests of the safety of the child or young person, AFL People and any other participants.

### **9.13 Overnight stays and sleeping arrangements**

Overnight stays are to occur only within or part of a formal program, activity or service, and must not occur at a private residence. Written authorisation of the parent or carer of each child and young person involved must be obtained including medical forms.

Practices and behaviour by all AFL People during an overnight stay with children and young people must be consistent with the practices and behaviour expected during delivery of AFL programs, activities or services at all other times.

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

- minimum of two adults on any overnight stay with children or young people present. If an exemption is required, written permission from the relevant Department General Manager and each parent or carer must be obtained in advance;
- providing children and young people with privacy when bathing, using the bathroom and dressing;
- observing appropriate dress standards when children and young people are present (e.g. no exposure to adult nudity);
- not allowing children or young people to be exposed to pornographic material (e.g. through movies, television, the internet or magazines);
- not leaving children or young people under the supervision or protection of peers or unauthorised persons such as hotel staff;
- not allowing sleeping arrangements that may compromise the safety of children and young people such as unsupervised sleeping arrangements, or an adult sleeping in the same bed as a child or young person;
- the exercisable right of children and young people to contact their parents, carers or others if they feel unsafe, uncomfortable or distressed during the stay; and
- ensuring an appropriate gender balance of adult supervisors is present if male and female children and young people are participating in the overnight stay (e.g. female supervisors available if female children or young people are involved and vice versa).

### **9.14 Change room arrangements**

AFL People are required to supervise children and young people in change rooms while balancing that requirement with a child or young person's right to privacy. In addition:

- AFL People should avoid one-to-one situations with a child or young person in a change room area;
- AFL People should where possible, avoid being present in a change room area with a child or young person whilst they are changing;
- AFL People are not permitted to use the change room area to undress or dress, while children and young people are present;

- AFL People need to ensure adequate supervision in ‘public’ change rooms when they are used, providing the level of supervision required for preventing abuse by members of the public, adult users, or general misbehaviour, while also respecting a child’s or young person’s privacy;
- phones, cameras and recording devices are not to be used in changing rooms and in particular whilst children and young people are in a state of undress and/or getting dressed; and
- AFL People should respect and where possible, accommodate the wishes of children and young people to use toilets, change rooms and other facilities in accordance with their gender identity.

### **9.15 Use, possession or supply of alcohol or drugs**

Whilst supervising children or young people, AFL People must not:

- use, possess or be under the influence of an illegal drug;
- use or be under the influence of alcohol;
- be incapacitated by any other legal drug such as prescription or over the counter drugs;
- supply alcohol or drugs (including tobacco/vapes) to children or young people; or
- supply or administer medicines, except when permitted by law (e.g. epi pen) or with the consent of a child or young person’s parent or carer under a valid prescription for that child or young person and at the prescribed dosage.

Use of legal drugs, other than alcohol and tobacco, is permitted, provided such use does not interfere with the AFL Person’s ability to care for children and young people involved in our sport.

### **9.16 Transporting children and young people**

The AFL acknowledges that from time to time there are valid reasons for transporting children and young people. Children and young people are to be transported only:

- in circumstances that are directly related to the delivery of an AFL program, activity or service;
- with prior authorisation from the relevant Department General Manager or person delegated with their authority and from the child or young person’s parent or carer; and
- by a designated adult that has a full driver’s license and insurance.

It is recommended that the child or young person being transported sits in the back seat of the car and expected timelines of travel are to be communicated to that child or young person, the parent or carer and management.

### **9.17 Drop off/pick up of children and young people**

The AFL acknowledges that parents and carers may not always be present during the delivery of programs or services. Where parents or carers drop off and pick up children and young people, AFL People must:

- ensure children, young people and their parent or carer know the start/finish times and location of the activity;
- have an accessible register of parent or carer emergency contact numbers and always have access to a phone;
- ensure they are aware of any alternative pick up arrangements for children and young people and that the parent or carer has provided written or direct verbal consent;
- where an alternative pick up arrangement has been made, that AFL people request photo identification to confirm identity of person to pick up the child or young person;
- wait until the last child or young person is collected before they leave;
- when a parent or carer is running late, ask the second to last child or young person and their parent or carer (or another coach or club member) to wait also to avoid being left alone; and
- contact police if a parent or carer or other family member cannot be reached.

## **9.18 Uniform**

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

## **10. PROHIBITED CONDUCT**

### **10.1 Prohibited Conduct – AFL People**

An AFL Person commits a breach of this Policy when they:

- are found guilty of any breach of a relevant state or territory or Commonwealth law relating to or involving Child Abuse or Grooming; or
- either alone or in conjunction with another or others, engage in any of the following conduct, either in-person, online or via any other form of telecommunication, against, or in relation to, a Child/Young Person:
  - i. Harmful Behaviours Towards a Child/Young Person;
  - ii. Bullying;
  - iii. Discrimination;
  - iv. Harassment;
  - v. Victimisation;
  - vi. Vilification;
  - vii. request or infer that the Child/Young Person keep any communication secret from their parents/carer, or other AFL Person such as a coach or administrator, or the AFL, an AFL State Entity or MSL;
  - viii. supply alcohol, or drugs (including tobacco) to a Child/Young Person;
  - ix. supply medicine to a Child/Young Person, except for:
    - (A) where the AFL Person reasonably believes that the medicine is necessary for lifesaving medical treatment;
    - (B) when permitted by law; or
    - (C) with the consent of the parent, guardian, or carer of the Child/Young Person and under a valid prescription for that Child/Young Person and at the prescribed dosage; or
- do not comply with the Child Safe Practices and Requirements as set out in Section 9 of this Policy that are applicable to all AFL Persons.

### **10.2 Prohibited Conduct – Person in a Position of Authority**

In addition to Prohibited Conduct outlined in 9.18.1, a Person in a Position of Authority commits a breach of this Policy when they, either alone or in conjunction with another or others, engage in any of the following conduct against, or in relation to, a Child/Young Person:

- do not comply with continue in a Child/Young Person-related position if they have been charged or convicted of a crime that would make them ineligible to be granted a WWCC; or
- the Child/Young Person Safe Practices that are applicable to Persons in a Position of Authority as set out in Section 9 of this Policy.

## **11. RISK MANAGEMENT**

The AFL will prioritise the safety of children and young people in its overall risk management approach.

The AFL has prepared and maintains a Safeguarding Children and Young People Risk Register in line with the AFL's Enterprise Risk Management Framework. The risk register is continuously updated to capture any key safeguarding children and young people risks across AFL activities, programs or services and the controls in place to mitigate these risks.

An AFL Safeguarding Children and Young People Risk Assessment (risk assessment) should be undertaken in advance of the provision of any AFL activities, programs or services involving children or young people. The risk assessment must identify potential risks to the safety of children and young people and the proposed control measures to be implemented to manage those risks. The risk assessment must be prepared in consultation with the AFL Risk and Compliance Manager and Safeguarding Manager and approved prior to the activities, programs or services taking place.

## **12. REPORTING OBLIGATIONS**

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

AFL People are required to immediately report:

- any instance of any AFL People breaching this Policy or the Safeguarding Children and Young People Code of Conduct;
- any instances, allegations or disclosures of child abuse or other inappropriate conduct such as grooming or bullying that they become aware of, or any concerns that they develop in relation to these matters (whether by a source internal or external to the AFL, including a family member, carer or guardian of the child or young person).

Reports must be submitted on the AFL's online reporting platform in accordance with the AFL Safeguarding Children and Young People Complaints and Reporting Procedure.

The AFL documents any allegation, disclosure or concern regarding child abuse and any other form of inappropriate behaviour and monitors responses to all allegations, disclosures or concerns.

Additional legal obligations may exist in each State and Territory regarding mandatory reporting (See Appendix A) where any behaviour that may constitute a criminal offence must be reported to a statutory agency/body (e.g. police or relevant child protection agency) in accordance with the relevant state/territory law. For example, failure to disclose sexual offences committed against a child and failure by a Person in a Position of Authority to protect a child against sexual abuse. Failure to report information about suspected child abuse and/or harm is prohibited conduct, particularly in relation to Position in a Position of Authority roles. The Position of Authority requirements are mandated under state and territory legislation. Non-compliance could result in criminal convictions under the relevant laws.

### **12.1 Acknowledging vicarious trauma and support to AFL People**

It is acknowledged that disclosures of harm and/or abuse can be traumatic for every person involved. If an AFL Person requires assistance or support to debrief about an incident, allegation and/or disclosure they are encouraged to discuss this confidentially with their manager and/or access the Employee Assistance Program (EAP Tel: 1300 687 327).

## **13. INVESTIGATING**

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

## **14. RECORD KEEPING**

Good record management plays an important role in safeguarding children and young people by assisting the AFL to identify causes for concern at an early stage and to monitor and manage safeguarding issues in a timely and thorough manner when they arise. The management of accurate and up to date records also plays an important role in the continuous review and improvement of the AFL's safeguarding policies and practices.

The AFL will:

- retain records of reports of child abuse and complaints about child safety;
- in maintaining records of reports about child safety, maintain confidentiality and privacy for children, young people and their families in accordance with legislation; and

will appropriately note identified risks to child safety through the record keeping process and will incorporate those into its risk register.

## **15. PRIVACY**

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

On occasion, to support the safety and wellbeing of children and young people, the AFL may share information both internally between AFL programs and/or with relevant external bodies. Any information shared will be done so in a confidential manner and in accordance with applicable data protection legislation and the AFL's Privacy Policy.

## **16. COMMUNICATION AND EDUCATION**

The AFL communicates this Policy to all AFL employees. The AFL involves AFL employees in reviews of this Policy and communicates any significant alterations of this Policy to AFL employees. In accordance with the AFL's development and implementation of its education plan, all AFL employees will be required to undertake safeguarding training as part of the onboarding process with the AFL and AFL employees who work directly with children and young people will be required to undertake regular safeguarding training to refresh their knowledge on safety and wellbeing matters.

## **17. MONITORING AND REVIEW**

The AFL monitors AFL People's and our external providers' compliance with this Policy and the Supporting Documents. The AFL reviews policies, procedures, practices and incident data in relation to safeguarding children and young people from child abuse and harm on an ongoing basis.

The AFL involves relevant stakeholders in reviews of this Policy and communicates any significant alterations of this Policy to AFL People. The AFL undertakes reviews at least annually to identify and document potential risks to children or young people associated with the delivery of our activities, program, services and facilities. The AFL has a procedure to undertake annual reviews of this Policy, as part of our ongoing compliance with safeguarding requirements, although reviews and alterations may occur more frequently due to legislative changes, organisational changes, incident outcomes and other matters deemed appropriate by the AFL Executive.

## 18. RELATED LEGISLATION

The AFL and all AFL People are also bound by legislation relevant to the protection of children and young people. Please refer to Appendix A for a list of relevant legislation.

### APPENDIX A

	<b>Principle Child Protection Act</b>	<b>Mandatory Reporting</b>	<b>WWCC</b>	<b>Reportable Conduct</b>
<b>NSW</b>	Children and Young Persons (Care and Protection) Act 1998 (NSW)	Children & Young Persons (Care & Protection) Act 1998 (NSW)	Child Protection (Working with Children) Act 2012	Ombudsman Act 1974
<b>ACT</b>	Children and Young People Act 2008 (ACT)	Children & Young People Act 2008 (ACT)	Working with Vulnerable People (Background Checking) Act 2011	Reportable Conduct and Information Sharing Legislation Amendment Act 2016
<b>VIC</b>	Children, Youth and Families Act 2005 (Vic.) Child Wellbeing and Safety Act 2005	Children, Youth & Families Act 2005 (Vic) Crimes Act 1958	Worker Screening Act 2020	Children Legislation Amendment (Reportable Conduct) Act 2017 Child Wellbeing and Safety Act 2005
<b>TAS</b>	Children, Young Persons and their Families Act 1997 (Tas.)	Children, Young Persons and their Families Act 1997 (Tas)	Registration to Work with Vulnerable People Act 2013	
<b>QLD</b>	Child Protection Act 1999 (Qld)	Child Protection Act 1999 (Qld)	Working with Children (Risk Management and Screening) Act 2005	
		Education (General Provisions) Act 2006 (Qld)		
<b>NT</b>	Care and Protection of Children Act 2007 (NT)	Care & Protection of Children Act 2007 (NT)	Care and Protection of Children Act 2007 (NT)	
<b>CTH</b>		Family Law Act 1975 (Cth)		
<b>Australian Employment Legislation</b>				
Australian Human Rights Commission Act 1986				

	Principle Child Protection Act	Mandatory Reporting	WWCC	Reportable Conduct
	Age Discrimination Act 2004			
	Disability Discrimination Act 1992			
	Racial Discrimination Act 1975			
	Sex Discrimination Act 1984			
	Fair Work Act 2009			
	Fair Work Regulations 2009			
	Freedom of Information Act 1982			
	Privacy Act 1988			
	Work Health and Safety Act 2011 (Cth)			
	Fair Work Amendment (Protecting Vulnerable Workers) Act 2017			
	<b>International legislation</b>			
	The United Nations Convention on the Rights of the Child 1989			