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AFL Safeguarding Children and Young People Policy

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1. PURPOSE

This Safeguarding Children and Young People 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 behaviour standards set out in this Policy (including by complying with appropriate measures to address risks) and report any behaviours that do not comply with it.

The purpose of this Policy is to:

1. Provide a clear statement to AFL People forbidding Child Abuse.
2. Prevent Child Abuse occurring within the AFL.
3. Work towards an organisational culture of child safety within the AFL.
4. Ensure that all AFL People are aware of their responsibilities for identifying possible Child Abuse and for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs.
5. Provide guidance to AFL People as to action that should be taken where they suspect any Child Abuse within or outside of the AFL.
6. Provide assurance that any and all suspected Child Abuse 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 Head or, if appropriate, a member of the Executive, prior to taking action that contravenes this Policy or advise their Department Head 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
AFL	Australian Football League being the governing body for Australian Football, which conducts Australian Football competitions throughout Australia.

Term	Definition
AFL People	<p>The following persons associated with the AFL and/or AFL State Entities:</p> <ul style="list-style-type: none"> • All employees (including casual); 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.
AFL State Entities	<p>The State entities controlled by the AFL being:</p> <ul style="list-style-type: none"> • AFL (NSW/ACT) Commission Limited; • AFL Northern Territory Limited; • AFL Queensland Limited; • Football Tasmania Limited; and • Australian Football League (Victoria) Limited.
Bullying	<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. Bullying has been described by researchers as taking many forms which are often interrelated, and may include:</p> <ul style="list-style-type: none"> • <i>Verbal</i> (name calling, put downs, threats); • <i>Physical</i> (hitting, punching, kicking, scratching, tripping, spitting); • <i>Social</i> (ignoring, excluding, ostracising, alienating); and/or • <i>Psychological</i> (spreading rumours, stalking, dirty looks, hiding or damaging possessions).
Children and Young People	<p>A person 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>
Child Abuse	<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, 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>
Department Head	<p>Department Head means a member of staff responsible for the management of a department or a function. The role will typically have 'Head of' in the title and report directly to an Executive.</p>
Emotional or Psychological Abuse	<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. Constant criticism, teasing, ignoring,</p>

Term	Definition
	threatening, yelling, scapegoating, ridicule and rejection or continual coldness are all examples of emotional abuse. These behaviours can result in significant damage to the Child's or Young Person's physical, intellectual or emotional wellbeing and development.
Executive	Executive means a member of staff with executive responsibility of a department reporting to the AFL Chief Executive Officer.
Family Violence	<p>Family violence occurs when Children or Young People are forced to live with violence between adults in their home.</p> <p>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.</p>
Grooming	<p>Grooming is a term used to describe activities by which a perpetrator of abuse builds a relationship with a Child or Young Person, with a view to physically abusing them. There is no set pattern in relation to the grooming of Children or Young People. For some perpetrators, there will be a lengthy period of time before the Physical Abuse begins. The Child or Young Person may be given special attention and, what starts as an apparently normal display of affection, such as cuddling, can develop into sexual touching or masturbation and then into more serious Sexual Abuse. Other perpetrators may draw a Child or Young Person in and abuse them relatively quickly. Grooming can take place in any setting where a relationship is formed, such as in the context of leisure, music, sports and religious activities, in internet chatrooms, in social media or by other technological channels.</p>
Harm	<p>Harm to a Child or Young Person is any detrimental effect of a significant nature on the Child's or Young Person's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by:</p> <ul style="list-style-type: none"> • Emotional or Psychological Abuse, Physical Abuse or Neglect; • Sexual Abuse; • a single act, omission or circumstance; and • a series or combination of acts, omissions or circumstances.
Neglect	<p>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 neglect and educational neglect.</p>
Physical Abuse	<p>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</p>

Term	Definition
	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.
Safeguarding Children and Young People Code of Conduct	The <i>Safeguarding Children and Young People Code of Conduct</i> 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.
Sexual Abuse	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. 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.
Sexual Exploitation	Sexual exploitation occurs when a Child or Young Person is forced into sexual activities that are then recorded in some way and/or used to produce pornography. Such pornography can be in the form of actual photos or videos or published on the internet. Exploitation can also involve a Child or Young Person who is forced into prostitution.

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 all AFL People.

In short, this means that this Policy applies to the AFL, the AFL State Entities and the AFL's and the AFL State Entities' employees, 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 communication 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 equal rights to protection from Child 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 including by fostering a culture in which Children and Young People feel safe.

As part of the AFL's commitment to the safeguarding of 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 particular needs of Aboriginal and Torres Strait Islander Children and Young People, Children and Young People from culturally and/or linguistically diverse backgrounds and Children and Young People with a disability and will implement culturally appropriate practices and procedures to address those needs.
- The AFL will consider the opinions of Children and Young People and use their opinions to inform the development of policies and procedures in relation to the protection of Children and Young People.
- The AFL will educate Children and Young People and their parents/guardians about self-protection and empowerment and ensure that relevant information and resources are accessible to them.
- 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 protection is a shared responsibility between all AFL People. All AFL People are responsible for the care and protection of the Children and Young People in our care and for reporting information about suspected Child Abuse. All AFL People must ensure that they understand their responsibilities in respect of the protection of Children and Young People as set out in this Policy.

A summary of the responsibilities of key groups of AFL People is set out below.

Entity	Role/Responsibility
AFL Commission / Executive	<ul style="list-style-type: none"> • Develop appropriate policies and procedures relating to Children's and Young People's safety. • Promote the AFL's commitment to safeguarding Children and Young People as set out in this Policy. • Ensure adequate resources are allocated to allow for the effective implementation of this Policy and the Supporting Documents. • 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. • Advocate and promote Children's and Young People's rights to empower and engage Children and Young People.
AFL State Entity Heads and AFL and AFL State Entity Department Heads	<ul style="list-style-type: none"> • 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. • Oversee the implementation of this Policy by all AFL People engaged by the AFL State Entity or the AFL (as applicable). • 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). • 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.

Entity	Role/Responsibility
	<ul style="list-style-type: none"> • 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. • 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. • Advocate and promote Children's and Young People's rights to empower and engage Children and Young People. • Create opportunities for regular discussion at all levels to support a culture of continuous improvement and accountability for child protection. • 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 in working, coaching, umpiring or volunteering with Children and Young People and their families. • Be familiar with the types of Child Abuse that might occur within their area of responsibility and be alert for any indications of such conduct.
<p>AFL and AFL State Entity employees, volunteers and contractors/consultants (directly engaged)</p>	<ul style="list-style-type: none"> • 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. • Undertake any required induction and training relevant to safeguarding Children and Young People. • Seek guidance from Department Head 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. • Take the appropriate action to protect Children and Young People from all forms of Child Abuse and any other forms of inappropriate behaviour. • Assist in creating and maintaining a child safe culture and a culture of inclusion. • 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. • Adopt the practices and behaviour set by this Policy as standard when carrying out their roles.
<p>AFL Integrity & Security Department</p>	<ul style="list-style-type: none"> • 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.

Entity	Role/Responsibility
	<ul style="list-style-type: none"> • 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. • Provide guidance, support and advice to all AFL People in relation to concerns about a Child's or Young Person's wellbeing. • 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. • Review reports in relation to investigations conducted under this Policy and provide feedback to appropriate AFL People. •
AFL People Department	<ul style="list-style-type: none"> • 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. • 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).

7. RECRUITMENT AND PRE-EMPLOYMENT SCREENING

The AFL is committed to implementing recruitment and screening practices that prioritise the safeguarding of Children and Young People from Child Abuse. AFL recruitment and screening practices must identify the most suitable people for positions who share the AFL's commitment to protecting Children and Young People. The AFL requires all AFL People 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, which include safeguarding-related questions;
- undertaking two professional reference checks for all potential employees and two suitable reference checks for volunteer positions;
- undertaking the relevant screening checks (specific to the role), which may include identity, criminal record, Working With Children Checks and qualification checks;

- as soon as reasonably practicable following engagement, a requirement that AFL People review and acknowledge their understanding of this Policy; and
- once engaged, a requirement that all new AFL People 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 People to successfully obtain and maintain 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 they for whatever reason are 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 People to disclose 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.

8. KEY 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 9) of this Policy.

8.1. 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, inappropriate text messaging, inappropriate photography or exposure to pornography or nudity.

8.2. 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 of 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 particular 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.

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.

8.3. 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 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 and Young People 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 or AFL People.

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 8.12 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.

8.4. 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 Indigenous (Aboriginal and Torres Strait Islander) Children and Young People (for example, by never questioning an Indigenous 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 having a zero tolerance of discrimination); and
- promote the safety, participation and empowerment of Children and Young People with a disability (for example, during personal care activities).

8.5. 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 Head 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 guardian (see section 8.16 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 or financial support;
- seek contact with Children or Young People (or former participants) outside AFL programs, activities or services, including through social media;
- 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; or
- engage in open discussions of a mature or adult nature with or in the presence of Children or Young People.

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 Head 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 guardian to discuss, and/or
- seek advice from their Department Head or person delegated with their authority.

8.6. Uniform

AFL People should only wear AFL uniform (where 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.

8.7. 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 harmful to Children or Young People;
- does not include language that is:
 - discriminatory, racist or sexist;

- derogatory, belittling or negative, for example, by calling a child a 'loser' or telling them they are 'too fat';
- intended to threaten or frighten; or
- profane or sexual in nature.

8.8. 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 our 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.

8.9. 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 guardian.

Where a parent 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 guardian, nor keep the communication a secret from the AFL Person's Department Head or person delegated with their authority.

All AFL People are required to adhere to the [AFL Social Media Engagement 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, gaming sites or through web searches, or inappropriate email communication.

8.10. 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/guardians are made aware of any gift given.

8.11. Photographs or filming 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 or filmed while involved in an AFL program, activity or service only if:
 - consent is obtained from the Child's or Young Person's parent or guardian;
 - the Child or Young Person consents to being photographed or filmed;
 - 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 or filmed or a Child's or Young Person's parent or guardian has not provided permission for the Child or Young Person to be photographed or filmed, 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 Head's or a person delegated with their authority's knowledge and approval.
- Photographs and films are not to be taken 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.
- 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 guardian 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 guardian.

8.12. 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.

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 or in the process of administering first aid;
- 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 guardian 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.

8.13. Overnight stays and sleeping arrangements

Overnight stays are to occur only within or part of a formal program, activity or service. Written authorisation of the parent or guardian 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 Head and each parent or guardian must be obtained in advance;
- providing Children and Young People with privacy when bathing 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 other Children or Young People or unauthorised persons such as hotel staff or friends;
- 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, guardians 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).

8.14. 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 avoid being present in a change room area with a Child or Young Person of the opposite sex 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; and
- phones, cameras and recording devices are not to be used in changing rooms and in particular whilst Children and Young People are getting dressed.

8.15. 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; or
- supply alcohol or drugs (including tobacco) to Children or Young People.

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.

8.16. Transporting children

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; and
- with prior authorisation from the relevant Department Head or person delegated with their authority and from the Child or Young Person's parent or guardian.

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 the parent or guardian and management.

9. RISK MANAGEMENT

The AFL will prioritise the safety of Children and Young People in its overall risk management approach.

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 adopted to manage those risks. The Risk Assessment must be prepared in consultation with the AFL Compliance & Risk Department and submitted for approval to the AFL Integrity and Security Department in advance of the relevant activity, program or service being undertaken, or as otherwise required by the AFL Compliance & Risk Department.

The Development Program Risk Assessment Guide, which includes the Risk Assessment template, is available from the AFL Compliance & Risk Department and should be used to assist in the identification of relevant risks. Training will be provided to the relevant AFL People in relation to the preparation of Risk Assessments.

For ongoing AFL activities, programs and services, an approved Risk Assessment may be used on the recurrence of such AFL activities, programs and services so long as it is periodically reviewed at least annually or more frequently when any substantive change occurs.

10. 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 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.

11. 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.

12. 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.

13. COMMUNICATION

The AFL communicates this Policy to all AFL People. The AFL involves AFL People in reviews of this Policy and communicates any significant alterations of this Policy to AFL People. The AFL will support ongoing education and training for all AFL People to ensure safeguarding information is provided on an ongoing basis.

14. 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 and practices in relation to safeguarding Children and Young People from Child Abuse 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.

15. 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 – RELEVANT LEGISLATION

	Principle Child Protection Act	Mandatory Reporting	WWCC	Reportable Conduct
NSW	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
ACT	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
VIC	Children, Youth and Families Act 2005 (Vic.)	Children, Youth & Families Act 2005 (Vic)	Working With Children Act 2005	Children Legislation Amendment (Reportable Conduct) Act 2017
TAS	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	
QLD	Child Protection Act 1999 (Qld)	Child Protection Act 1999 (Qld)	Working with Children (Risk Management and Screening) Act 2000	
		Education (General Provisions) Act 2006 (Qld)		
NT	Care and Protection of Children Act 2007 (NT)	Care & Protection of Children Act 2007 (NT)	Care and Protection of Children Act 2007 (NT)	
CTH		Family Law Act 1975 (Cth)		
Australian Employment Legislation				
Australian Human Rights Commission Act 1986				
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

