Policy for Safeguarding Children and Young People

Fremantle Football Club

(ACN 066 055 249)

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1. Purpose and Commitment

1.1. Purpose

This Policy for Safeguarding Children and Young People (Policy) outlines how the Fremantle Football Club (FFC) will deliver its obligations and commitments to safeguarding Children and Young People involved in FFC activities, events, services and facilities. This Policy seeks to provide a safe, fair and inclusive environment for Children and Young People through FFC's programs and services by assisting FFC People to understand their respective responsibilities regarding safeguarding Children and Young People.

The purpose of this Policy is to:

1. Provide a clear statement to FFC People prohibiting Child Abuse;
2. Prevent Child Abuse from occurring within the FFC and its corresponding activities and programs;
3. Work towards an organisational philosophy of child safety within the FFC and wider community;
4. Ensure that all FFC People are aware of their respective responsibilities for identifying possible Child Abuse and for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs; and
5. Provide guidance to FFC People as to appropriate action that should be taken when there is suspicion of Child Abuse.
6. Provide assurance that any and all suspected Child Abuse will be reported and investigated as appropriate.

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

Part of our pledge to Children and Young People within the AFL community means that we are inclusive of those from a breadth of diverse backgrounds. This includes but is not limited to:

- Aboriginal and Torres Strait Islander Children and Young People;
- Children and Young People with a disability
- LGBTQI+ Children and Young People; and
- Children and Young People from culturally linguistically varied backgrounds.

This Policy has been endorsed by the FFC Board and FFC Executive.

1.2. Commitment

FFC recognises the importance of Children and Young People and their role within FFC and the community, with Children and Young People requiring special care and consideration for them to be in a safe environment. The FFC is committed to the promotion and protection of the safety and welfare of Children and Young People in our supervision who access activities, programs, services or facilities of which the FFC is responsible for. Everyone involved in our sport including Children and Young People should be treated with respect and dignity and be free to participate without being discriminated against, harassed, bullied or abused.

The FFC’s Policy on Safeguarding Children and Young People seeks to promote and protect the rights of children in our care with an aim to prevent abuse from occurring by endorsing a child safe culture. In the unlikely event any concern or allegation is raised in relation to child abuse that has occurred under the FFC’s care, the FFC will ensure it is treated seriously. This concern or allegation will be fully investigated in a culturally sensitive manner in accordance with any relevant legislation and the FFC’s Policy and Procedure.
As a leader within the Australian sporting industry, the FFC will actively promote the safety of children, whilst recognising the importance for individuals and Affiliated Organisations to take direct responsibility for providing both a safe physical and online environment for children and young people in their care.

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.

As part of FFC’s commitment to the safeguarding of Children and Young People, FFC commits to the following:

- A zero-tolerance approach for Child Abuse.
- To provide an environment for all Children and Young People which allows them to feel supported and respected.
- Recognising the 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. Implementing appropriate practices and procedures to address individual needs.
- The consideration of the opinions and views of Children and Young People and use their respective opinions and views to inform the development of policies and procedures in relation to the protection of Children and Young People.
- In the event of inappropriate misconduct towards a Child or Young Person that has occurred while a Child or Young Person is under the FFC’s care. The FFC will ensure the matter is treated seriously, in a culturally sensitive manner and fully investigated in accordance with this Policy, the Supporting Documentation, other related policies and procedures and relevant legislation.
- The FFC will actively promote the safety and wellbeing of Children and Young People throughout the AFL community and wider community.

The delivery of a framework of child safety across the FFC is accomplished through continual support of Children and Young People. FFC also requires assistance from their parents/guardians and by each of our Affiliated Organisations to be a child safe organisation.

2. Scope

This Policy applies to the FFC and all FFC People; this meaning the FFC and FFC’s employees, players, directly engaged volunteers, consultants and contractors, who are involved to provide services to the FFC and/or are engaged in interactions with Children or Young People on behalf of the FFC.

3. Responsibilities / Key Requirements

3.1. Key Requirements

This Policy addresses the major areas where interaction occurs with Children and Young People who take part in FFC activities, programs, services of facilities.

(a) 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 FFC activities, programs, services or facilities. Engaging in sexual behaviour, either by FFC 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 or social media messaging, inappropriate photography or exposure to pornography or nudity.

(b) Grooming

FFC 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.

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.

(c) Positive Guidance

FFC strives to ensure that Children and Young People participating in any FFC 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.

FFC 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 FFC People to take disciplinary action involving physical punishment or any form of treatment that could reasonably be considered as degrading, cruel, frightening or humiliating.

(d) Promoting equity and diversity

All FFC People must ensure that their approach and interactions with Children and Young People are sensitive, respectful and inclusive of all backgrounds and abilities. FFC 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).

(e) Adhering to professional role boundaries

Interactions between FFC People and Children and Young People should be limited to interactions directly associated with the FFC activities, programs, services or facilities and FFC 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 FFC 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 3.1(o) below);
- engage in activities with Children or Young People who are participants in or members of our programs or organisation outside FFC activities, programs or services;
- provide support to a Child or Young Person, or their family, unrelated to FFC activities, programs or services; for example, tutoring or financial support;
- seek contact with Children or Young People (or former participants) outside FFC programs, activities or services, including through social media;
- where there is no existing social, personal or family relationship prior to engaging in FFC 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 FFC 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.

Any FFC 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.

(f) Uniform

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

This should only be done to allow a Child or Young person to identify an FFC Person as an authority figure who they can approach in times of need.

(g) Use of language and tone of voice

FFC 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.

(h) Supervision

FFC People are responsible for supervising Children and Young People participating in an FFC 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.

FFC People are required to avoid one-to-one unsupervised situations with Children and Young People participating in an FFC 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.

(i) 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 FFC Person and a Child or Young Person, the FFC Person must:
• restrict such communication to issues directly associated with delivering the FFC 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 FFC Person’s Department Head or person delegated with their authority.

(j) Giving gifts

FFC People may only give a gift to a Child or Young Person engaged in an FFC program, activity or service when:
• the FFC 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.

(k) 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 a FFC 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 FFC 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.

FFC People must comply with the FFC Privacy Policy in relation to holding and disclosing images and any other personal information. In particular, FFC 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.

(I) 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 FFC 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 FFC Integrity Committee, FFC Head of People & Culture, and the Child or Young Person’s parent or guardian as soon as possible.
All FFC People are required to report to FFC Integrity Committee or FFC Head of People & Culture, as soon as possible, any physical contact initiated by a Child or Young Person (whether directed to another Child or Young Person, to an FFC 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, FFC People, FFC and any other participants.

(m) 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 FFC People during an overnight stay with Children and Young People must be consistent with the practices and behaviour expected during delivery of FFC programs, activities or services at all other times.

Standards of conduct that must be observed by FFC 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 Executive 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 or 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 Peoplesuch 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).

(n) Change room arrangements

FFC 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:

- FFC People should avoid one-to-one situations with a Child or Young Person in a change room area;
- FFC People should avoid being present in a change room area with a Child or Young Person of the opposite sex whilst they are changing;
- FFC People are not permitted to use the change room area to undress or dress, while Children and Young People are present;
- FFC 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.

(o) Transporting children

FFC 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 FFC program, activity or service; and
- with prior authorisation from the relevant Executive 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.

(p) AFLW Requirements

In addition to the above, any further requirements for Safeguarding Children and Young Persons as part of the AFLW Program are detailed in Appendix B.

3.2. Recruitment and Pre-employment Screening

This Policy aims to minimise the likelihood that the FFC will appoint an employee/volunteer who is unsuitable to work with Children and Young People, reducing the possible risk posed to Children and Young People. FFC recruitment and screening practices must identify the most suitable people for positions who share FFC’s commitment to protecting Children and Young People. FFC requires all FFC employees to pass through its recruitment and screening processes prior to commencing their engagement with FFC.

FFC’s recruitment and screening practices include:

(a) Selection Criteria

All relevant role and job descriptions are to include a selection criterion which allows the applicant to demonstrate their comprehension and any experience they hold in working with Children and Young People, this may specifically address those with varied needs or backgrounds.

(b) Advertising

All roles involving interaction with Children and Young People should clearly include reference to safeguarding regimes in advertisements and job descriptions.

(c) Interviews

- Open-style questions are to be applied allowing for applicants to give an insight on their values, attitudes and understanding of professional boundaries and accountability regarding working with Children and Young People.
- Applicants should openly explain any gaps in employment.

(d) Pre-employment screening/s

- Applicants must ensure conformity with any screening obligations required by the FFC, including a valid Working with Children Check.
- An individual will not commence in any role involving any interaction with Children or Young People until the applicant’s screening has been validated and verified by the relevant body. In extraordinary circumstances, interactions can be commenced before validity or verification only when an applicant has
submitted for screening but is awaiting clearance. In these situations, additional supervision of the individual must be in place and there will be a ban on working alone.

(e) Education and Understanding

As soon as reasonably practicable following engagement, a requirement that FFC People review and acknowledge their understanding of this Policy; and once engaged, a requirement that all new FFC People participate in induction education, which will provide them with further information about or commitment to safeguarding Children and Young People.

### 3.3. FFC’s and FFC People’s Responsibilities

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<td><strong>Board of Directors</strong></td>
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| • Promotion of this Policy and FFC’s commitment and expectations.  
| • Guarantee adequate resources for implementation and development of this policy  
| • Assist in review of this Policy and any Supporting Documents at a minimum of an annual cycle, or when governed by changing legislation, regulations, or organisational learnings.  
| • Help with the promotion of Children’s and Young People’s rights and engage in the empowerment of Children and Young People.  |
| **Management Personnel** |  
|  
| • Ensure FFC People comprehend their obligations within this Policy and any supporting Documents.  
| • Oversee implementation of this Policy club-wide from an operations and people perspective.  
| • Allocate resources to allow for effective implementation of this Policy by FFC People.  
| • Support FFC Personnel in their decision upon commencement of any form of action to protect a Child or Young Person from abuse.  
| • Help guide external bodies (such as contractors, volunteers, schools) to understand their obligations through effective communication and providing relevant resources to them.  
| • Ensure FFC People engaged in any matters relating to safety or welfare of a Child or Young Person are consulted with appropriate support such as counselling.  
| • Help with the promotion of Children’s and Young People’s rights and engage in the empowerment of Children and Young People.  
| • Allow for further discussion to improve child safety and wellbeing.  |
| **Employees, Volunteers** |  
|  
| • Maintain an awareness and understanding of the commitments and expectations regarding Children and Young People as set out in this Policy.  
| • Participate in inductions and training in reference to Safeguarding Children and Young People.  
| • Seek clarification from management if an individual does not understand their responsibilities or the commitment outlined in this Policy.  
| • Act to assist in the protection of Children and Young People from all forms of Child Abuse or inappropriate behaviour.  
| • Help nurture a child safe culture and culture of inclusion in work practices.  
| • Report any concerns about safety or welfare of a Child or Young Person to the relevant authority as set out in FFC’s Reporting Procedure for Safeguarding Children and Young People.  |
| **Governance and Risk Department** |  
|  
| • Publish, and distribute this Policy and the consequences of Policy breaches.  
| • Support or advise FFC People in any concerns about a Child or Young Person’s safety or wellbeing.  
| • Be a contact for FFC regarding any matter in relation to safeguarding Children and Young People.  
| • Report to the Board and Management Team issues related to safeguarding Children and Young People and compliance with this Policy.  |
3.4. **Code of Conduct for Safeguarding Children and Young People**

The FFC’s Code of Conduct is reinforced by the following Commitment Pillars:

- Focus on an Individual’s Behavioural Requirements
- Recruitment/Pre-employment Screening and Education
- Involvement of Children, Young People and their Parent/Guardians
- Child Abuse Reporting
- Supporting a Child and Young Person through Safe Culture

This Code of Conduct for Safeguarding Children and Young People (**Code of Conduct**) explains a summary of the behaviours required by Fremantle Football Club (FFC) People towards and/or in the company of Children and Young People.

This Code of Conduct is applicable to all FFC People. It is essential for FFC to abide by the behavioural standards set out within this Code of Conduct and they have an obligation to report any behaviours that are not in compliance with this document in accordance with FFC’s Reporting Procedure for Safeguarding Children and Young People.

Any failure to follow this Code of Conduct will be deemed as a breach of the Policy and may lead to an investigation, disciplinary action including restriction or suspension of duties, or in extraordinary circumstances the termination of employment.

All FFC People **must** in the daily course of their employment or when engaged in activities or programs by the FFC:

- Treat all Children and Young People with the utmost respect;
• Ensure the appropriate supervision of all Children and Young People while participating in any FFC activity, program or within FFC facilities. This must be done whilst respecting the privacy of Children and Young People;

• Make certain that another adult is present when an individual is working near or with Children and Young People whenever possible;

• Ensure that if disciplinary action is required strategies are employed that are fair, respectful and appropriate for the development and welfare of the Child or Young Person involved;

• Restrict interactions with Children and Young People to the confines of FFC activities, programs, services and facilities;

• When possible all forms of communication including email, and text message sent to a Child or Young Person are copied to their parent, guardian or carer;

• Guarantee that correct approval has been obtained from the Child of Young Person’s parent, guardian or carer prior to any photography or film is taken of a Child or Young Person.

• Ensure that any photographs or film taken of a Child or Young Person is taken in relation to their involvement in FFC activities or programs.

• Endeavor to the best of their ability complete a risk assessment/s for any FFC activity or program that involves Children or Young People prior to carrying out the FFC activity or program.

• Disclose as soon as possible any charges or convictions affecting an individual’s suitability to engage with Children and Young People to the FFC Governance & Risk Department; and

• Immediately report any concern for a Child or Young Person’s safety or wellbeing or report any suspected breaches of the FFC’s Policy or this Code of Conduct, in accordance with the Reporting Procedure.

All FFC People must not in the daily course of their employment or when engaged in activities or programs by the FFC:

• Participate in any sexual behaviour with or in the presence of Children or Young People;

• Participate in a form of behaviour that a reasonable person would consider to be Child Abuse, including the Grooming of a Child or Young Person;

• Engage in any unnecessary physical contact with a Child or Young Person, this includes doing activities of a personal nature a Child or Young Person can do themselves.

• Commit disciplinary action involving physical punishment or any other kind of treatment could be reasonably deemed as demeaning, callous, frightening or degrading.

• Use inappropriate language or behaviour towards or in the presence of Children or Young People, that could be deemed as inappropriate, abusive, sexually proactive, intended to humiliate, culturally inappropriate or a form of harassment.

• Consume alcohol, illicit drugs or tobacco when working with any Children or Young People.

• Offer gifts or any other incentive to a Child or Young Person engaged in an FFC activity, program or service without permission from the FFC and the Child’s or Young Person’s parent, guardian or carer.

• Transport a Child or Young Person without the permission of the FFC or person assigned with their authority and the Child’s or Young Person’s parent, guardian or carer.

• Contact or look to arrange contact, including online contact, with Children or Young People outside of the FFC’s programs, activities or services; or
• Use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material.

4. Risk Management

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

This Policy also imposes an obligation on FFC 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 of this Policy. A Club Risk Assessment (Risk Assessment) should be undertaken in advance of the provision of any FFC 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 Governance & Risk Department and submitted for approval to the Governance & Risk Department in advance of the relevant activity, program or service being undertaken, or as otherwise required by the FFC Risk Management requirements.

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

5. Reporting Obligations

If a Child or Young Person is at imminent risk of harm or in immediate danger, all FFC People are required to report the incident directly to the Police by calling ‘000’ (within Australia)

FFC People are required to immediately report:

• Instances of any FFC Person breaching this Policy or the Code of Conduct for Safeguarding Children and Young People;

• Instances, allegations or disclosures of Child Abuse or other inappropriate conduct such as Grooming or Bullying that they become aware of, or any concerns they may develop in relation to these matters (whether by a source internal or external to the FFC, including a family member or guardian of the Child or Young Person).

Reports are to be submitted in accordance with FFC’s Whistleblower Policy:

• External Parties (e.g. Members of FFC) can contact either a Club Whistleblower Protection Officer (WPO) or the AFL’s Integrity and Security Department to make a report (See Appendix A);

• Internal parties (e.g. FFC Staff) may use any of the following channels to make a report:
  o verbally or in writing to their immediate supervisor or department manager;
  o verbally or in writing to a Club WPO as listed in the FFC Whistleblower Policy or Appendix A of this Policy; or,
  o if the individual does not feel they are able to use the internal channels as the alleged conduct involves a WPO or an executive of the Club; or, the Club has failed to appropriately respond to the report, they may contact the AFL’s Integrity and Security Department as detailed in Appendix A of this Policy.

6. Investigation

In the case when an appropriate child protection service, the police, the AFL Integrity and Security Department, or the FFC’s Integrity Committee investigate a report made in accordance with Clause 5 of this Policy, all FFC People must co-operate fully with the investigation.
7. Privacy

Ensuring the protection of personal information is fundamental to the FFC. The FFC will comply with all privacy legislation (including the Privacy Act 1988 (Cth) and the Australian Privacy Principles) when handling personal information as required by this Policy.

All personal information collected or recorded by the FFC in relation to the safety of Children and Young People will be treated seriously and the FFC will respect the privacy of the individuals involved, except if doing so would compromise the welfare of the Child or Young Person and/or investigation of the allegation.

8. Policy Communication, Status and Review

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

This Policy will be reviewed annually, in consultation with stakeholders. Certain circumstances may require an early review of the policy, these circumstances include but are not limited to legislative changes, organisation changes, incident outcomes and other matters deemed appropriate by the Board or the AFL governing body.

9. Relevant Legislation

The club has set out this policy to be consistent with the following Commonwealth 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 and Health and Safety Act 2011
- Fair Work Amendment (Protecting Vulnerable Works) Act 2017

The club additionally has set out this policy to be consistent with the following Western Australian Legislation:

- Children and Community Services Act 2004
- Children and Community Regulations 2006
- Working with Children Act 2004

10. Organisational Policies and Procedures

This document relates to other FFC policies, including:

(a) Whistleblower Policy
(b) Drug and Alcohol Policy

11. Definitions

Abuse means Physical Abuse, Emotional and/or Psychological Abuse, Sexual Abuse, and abuse of power that causes, is causing or is likely to cause harm to a person’s safety, wellbeing or development, whether directly or as a result of indirect actions such as the viewing of material by a person.

AFL means the Australian Football League
**Affiliated Organisations/s** means those organisations which are affiliated to Fremantle Football Club from time to time in accordance with the Club’s policies.

**Child Abuse** means the mistreatment of a Child or Young Person that harms, is harming or is likely to harm or endanger the Child or Young Person’s physical and/or emotional health, safety, development or wellbeing and includes Emotional and/or Psychological abuse, Bullying, Grooming, Sexual Exploitation, Sexual Abuse, Neglect and/or Harassment.

**Children or Young People** are individuals under 18 years of age that participates or is involved in any program or services delivered by the FFC or an Affiliated Organisation.

**Emotional/Psychological Abuse** is abuse that may involve humiliating, terrorising, name-calling, belittlement, inappropriate symbolic acts, taunting, sarcasm, yelling, negative criticism, placing unrealistic expectations on a Child or Young Adult or continual coldness from the parent, guardian or carer, to an extent that results in significant damage to the child’s physical, intellectual or emotional wellbeing a development

**FFC People** means the FFC’s employees, players, directly engaged volunteers, consultants and contractors, who are involved to provide services to the FFC and/or are engaged in interactions with Children or Young People on behalf of the FFC.

**Grooming** is a term used to describe what happens when a perpetrator builds a relationship with a child with a view to abuse them at some stage. Grooming does not necessarily involve any sexual activity or even discussion of sexual activity – for example, it may involve establishing a relationship with a Child or Young Adult, parent or carer (e.g. giving special attention, providing favours, giving gifts) for the purpose of facilitating sexual activity at a later time.

**Harm** means any detrimental effect on the child’s physical, psychological, emotional wellbeing or safety caused by physical, psychological or emotional abuse, neglect or sexual abuse. Harm can be caused by a single act, omission or circumstance or can be ongoing.

**Harassment** means any behaviour that offends, humiliates or intimidates another person in situations in which a reasonable person, having regard to all the circumstances, would have anticipated that the other person would be offended, humiliated or intimidated. It may be based on race or gender, related to disability, sex, religion or any other specific grounds and can take many forms such as oral, written or physical behaviour. A person can feel distressed regardless of whether the conduct is deliberate or unintentional.

**Physical Abuse** occurs when a person subjects a child 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; giving a child alcohol or drugs; or training that exceeds the child’s development or maturity

**Sexual Abuse** means behaviour when an adult or person in authority involves a Child or Young Person in sexual activity or exposes them to matter or communications of a sexual nature. Behaviours may include making sexual comments to a Child or Young Person, engaging the Child or Young Person in sexual conversations online or in person, kissing, touching a Child or Young Person’s genitals or other inappropriate touching of a Child or Young Person, oral sex or intercourse with a Child or Young Person, encouraging the Child or Young Person to view pornographic materials (whether that be online, magazines, videos) or engaging a Child or Young Person in sexual conversations (whether online or other forms of communication).

**Sexual Exploitation** means behaviour when an adult or person in authority involves a Child or Young Person in sexual activity or exposes them to matter or communications of a sexual nature. Behaviours may include making sexual comments to a Child or Young Person, engaging the Child or Young Person in sexual conversations online or in person, kissing, touching a Child or Young Person’s genitals or other inappropriate touching of a Child or Young Person, oral sex or intercourse with a Child or Young Person, encouraging the Child or Young Person to view pornographic materials (whether that be online, magazines, videos) or engaging a Child or Young Person in sexual conversations (whether online or other forms of communication).
Appendix A - Safeguarding Children and Young People Complaints & Reporting Procedure

1. Purpose

This Safeguarding Children and Young People Complaints and Reporting Procedure (Complaints and Reporting Procedure) sets out the procedure that all FFC People must follow to meet their responsibilities in relation to identifying, reporting, and responding to any concerns about, or incidents of, Child Abuse or other inappropriate behaviour towards Children or Young People in our sport.

2. Immediate Response

Overriding any practical requirements outlined through this procedure, if a Child or Young Person is at imminent risk of harm or in immediate danger, all FFC People are required to report the situation directly to the Police - CALL ‘000’ (within Australia).

3. What is to Be Reported

The following types of behaviours, including observed or suspected abuse, in relation to any Child or Young Person involved in FFC activities, programs or services must be reported in the manner described in this Complaints and Reporting Procedure:

- Child Abuse, Harm, Neglect or any other form of inappropriate behaviour such as Grooming or Bullying to a Child or Young Person (Emotional or Psychological, Physical or Sexual); and
- any breaches of the Policy or Code of Conduct.

4. Minimum Requirements When Responding to Disclosures of Child Abuse

The following points are to be considered and utilised when a reporting person is receiving a disclosure of Child Abuse from a Child or Young Person.

<table>
<thead>
<tr>
<th>LISTEN</th>
<th>REASSURE</th>
<th>RESPECT</th>
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</thead>
<tbody>
<tr>
<td>Actively listen to the Child or Young Person</td>
<td>Ask leading questions</td>
<td>DO NOT</td>
</tr>
<tr>
<td>Inform the Child or Young Person that they have done the correct thing by reporting</td>
<td>Make your own judgement or assessment</td>
<td></td>
</tr>
<tr>
<td>Respect the Child or Young Person may only reveal some details</td>
<td>Press for detail, a minimal account will suffice</td>
<td></td>
</tr>
<tr>
<td>Let the Child or Young Person use their own words in their own time - be patient</td>
<td>Make promises you cannot keep</td>
<td></td>
</tr>
<tr>
<td>Ask open ended questions</td>
<td>Make your own enquiries/investigations in relation to the allegations made</td>
<td></td>
</tr>
<tr>
<td>Explain to the Child or Young Person that other people may need to be told</td>
<td>Share information with others *Excl. Police, Child Protection, AFL Integrity and Security Department, FFC Integrity Committee, Manager, WPOs</td>
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</table>

5. How to Make a Report and Obligations

5.1. Overview

FFC People must report Child Abuse or other inappropriate behaviour in relation to a Child or Young Person that they are informed of, observe or suspect. A summary of the Incident Reporting Process that all FFC People must follow is set out at Appendix A1 to this Complaints and Reporting Procedure.
Immediate action will be taken in relation to any matter reported to the FFC. The FFC will act with integrity, provide strong leadership and make decisions that are child centred, legal, ethical, accountable and transparent whilst meeting national and state legislative requirements.

5.2. Reporting Person’s Obligations

a) **Step 1:** If the Child or Young Person is in imminent risk of harm or immediate danger, the reporting person is required to report the situation directly to the police - CALL ‘000’.

b) **Step 2:** Regardless of whether the matter is reported to the police, it is imperative that the reporting person immediately contacts their FFC Manager or an FFC Whistleblower Protection Officer in the instance of external FFC People.

c) **Step 3:** Report the conduct to an FFC WPO.

If the individual does not feel they are able to use the internal channels as the alleged conduct involves a WPO or an executive of the Club; or, the Club has failed to appropriately respond to the report, they may contact the AFL’s Integrity and Security Department via the AFL’s Online reporting tool here:


All FFC People retain the right to report directly to relevant authorities, such as police or child protection, any concerns they may have in relation to the safety and welfare of a Child or Young Person, regardless of whether or not they have also reported that matter internally.

5.3. Whistleblower Protection Officers

The FFC’s WPOs are appointed in accordance with the Whistleblower Policy. WPO Contact Details are as follows:

<table>
<thead>
<tr>
<th>Title</th>
<th>Name</th>
<th>Contact Details</th>
</tr>
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<tbody>
<tr>
<td>Executive General Manager Operations and People</td>
<td>Joseph Brierty</td>
<td><a href="mailto:Josephbriertywbo@fremantlefc.com.au">Josephbriertywbo@fremantlefc.com.au</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Landline: 08 9433 7180</td>
</tr>
<tr>
<td>Head of People and Culture</td>
<td>Brad Wellings</td>
<td><a href="mailto:Bradwellingswbo@fremantlefc.com.au">Bradwellingswbo@fremantlefc.com.au</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Landline: 08 9433 7122</td>
</tr>
<tr>
<td>Chair of Integrity Committee</td>
<td>Craig Carter</td>
<td><a href="mailto:Craigcarterwbo@fremantlefc.com.au">Craigcarterwbo@fremantlefc.com.au</a></td>
</tr>
<tr>
<td>Member of Board of Directors</td>
<td>Colleen Hayward</td>
<td><a href="mailto:Colleenhaywardwbo@fremantlefc.com.au">Colleenhaywardwbo@fremantlefc.com.au</a></td>
</tr>
</tbody>
</table>

5.4. Child Safety Officer’s Reporting Obligations

When an FFC Manager is notified by a reporting person (subject to Step 2 of section 5.2) of an incident, they are to:

a) ensure the Report is escalated to an FFC WPO for investigation;

b) not provide investigative advice to the reporting person unless consent is provided from the Head of the FFC Integrity Committee, AFL Head of the Integrity & Security Department or nominated delegate.

In taking a report or disclosure of an incident from others, the reporting person or FFC Manager is not to assess the validity of such allegations or concerns, but to report all allegations as described in the step by step process outlined in section 5.2.

6. Reporting Timeframes

Reports and notifications must be made as soon as practicable and no later than before ending that person’s shift or session of work.

7. What Happens to a Report
7.1. FFC Whistleblower Protection Officer Obligations:
An FFC WPO will manage and investigate the report in accordance with the FFC Whistleblower Policy (which may include notification to the AFL Integrity and Security Department or relevant Law enforcement).

7.2. AFL Integrity & Security Department’s Obligations
The AFL Integrity & Security Department (ISD) will:

- receive the online report through its secure Incident Management System (IMS);
- contact the reporting person;
- contact FFC without disclosing the reporters name if requested;
- conduct an assessment of the disclosed information;
- ensure adequate support services are provided to all relevant persons; and
- notify the relevant Law Enforcement agencies if criminality has been identified, pursuant to mandatory reporting compliance.

7.3. Mandatory Reporting Provisions
In Australia, each state and territory has child safety laws that set out responsibilities for both organisations and individuals who work or have contact with Children and Young People.

The following link will direct you to the responsibilities associated with each state and territory:

8. Who Investigates the Report
The following entities will investigate the report or disclosure:

- State or Federal Law Enforcement Agency (i.e. Police) *Where Required
- Child Protections Services or State equivalent *Where Required
- AFL Integrity & Security Department
- FFC Integrity Committee or Whistleblower Protection Officers per the FFC Whistleblower Policy
- Independent League / Administration through the engagement of independent investigative and welfare services (Where the report or disclosure does not relate to the FFC or FFC People).

NOTE: At no stage will the ISD or FFC investigate in parallel to a State or Federal Law Enforcement Agency (i.e. Police) investigation. The ISD or FFC, will only investigate once they have received confirmation and permission in writing from the relevant Law Enforcement Agency (i.e. Police) that their investigation is completed.

9. Confidentiality and Privacy
The ISD and FFC maintains the confidentiality and privacy of all concerned (including the alleged perpetrator), except if doing so would compromise the welfare of the Child or Young Person and/or investigation of the allegation.

The AFL Head of Integrity & Security or FFC Chair of Integrity Committee, as required, will be responsible for the authorisation of the disclosure and sharing of any information relating to any incident reported pursuant to this procedure.

10. Monitoring
All reports received by FFC WPO’s will be reviewed in accordance with the Whistleblower Policy.

All reports recorded on the IMS will be reviewed by the AFL Head of Integrity & Security. The AFL Head of Integrity & Security (or a nominated delegate) is the only person authorised to close a case and will ensure all relevant persons have been informed of the outcome.
Appendix A1 – Incident Reporting Process

WHAT to Report

- Observed abuse, harm or neglect - (Emotional, Physical, Sexual)
- Potential abuse, harm or neglect - (Emotional, Physical, Sexual)
- Any suspicion of abuse, harm or neglect - (Emotional, Physical, Sexual)
- Breaches of the FFC Safeguarding Children and Young people Policy and/or Code of Conduct

HOW to make a Report

STEP 1 – If a Child or a Young Person is in any imminent risk of harm or in immediate danger – call “000”
STEP 2 – Immediately consult your FFC Manager or FFC WPO
STEP 3 – When practicable, make a report to an FFC WPO or on the AFL’s online reporting platform – No later than the end of the reporting persons shift


WHAT HAPPENS to the Report

FFC Integrity Committee or AFL Integrity and Security Department

- Conduct an assessment of the report for investigation allocation (Police, FFC Integrity Committee, AFL Integrity Team)
- Provide welfare and support service referrals
- Consider mandatory reporting requirements (Police, DHS, other) *where required

If a child or young person is in any imminent risk or harm or immediate danger – call 000
Appendix B - Safeguarding Children and Young People: Considerations and Guidelines for AFLW
Safeguarding Children and Young People
Considerations and Guidelines for AFLW
Season 2021/22
Contents:

1. Introduction
2. Purpose of Considerations
3. Legal and Policy Positions
4. Role of the PDM
5. Scenarios:
   1. Meeting with Players
   2. Rooming
   3. Travel
   4. Changerooms
   5. Photography
6. Recommendations for Young Players Finishing School Commitments
7. Support Through Talent Pathways
Introduction

The growth of AFLW will see programs starting a lot earlier than previous years for the 2021/22 season. The draft will take place at the end of July, with players returning to their clubs in August to begin their pre-season campaigns. Moving the draft date is seen to allow players to understand their football commitments prior to completing their school commitments and allow clubs to fully assess and put in place support networks for the drafted player. The season will kick off in October, resulting in some Clubs managing young players who are to be considered underage and finishing their final months of schooling.

For young people, the opportunities AFLW brings them is exciting and is a huge step in the next stage of their personal and football life. For the player, managing school and football commitments must be a priority. For those staff within the club, special thought needs to be given to how young people can be supported in the club environment.

Clubs can positively influence those within their programs, especially in relation to the club values and behaviours, by providing safe and supportive environments.

Promoting and role modelling behaviours that demonstrate respect for self and others within the AFLW competition ensures that we can create a space where young people can participate, compete, and develop in a safe, fun and welcoming environment.

Purpose of Considerations:

Built on the foundations of respect and respectful relationships, these considerations have been developed to assist staff working in the AFLW Clubs to understand the legal and policy positions of the AFL in relation to safeguarding young people, so they can apply the practical approaches to supporting young players* within their programs.

The considerations also provide details in relation to supporting players who are finishing their schooling, outlining the recommendations put forward by the AFL and AFLPA.

The principles of practice in this document have been designed for staff to help guide conversation with players about respectful relationships and respectful behaviour in the AFLW Clubs, to ensure that everyone feels safe and supported within the club. They also act as a guide for staff, when considering safe conduct when supporting young players in different contexts of AFLW.

*For the purpose of this document, a young person refers to an individual who is under the age of 18 years
Legal and Policy Positions

In working with young players and supporting respectful behaviours within the Club, our initial reference point begins with some key AFL policy and legal positions.

These policies and positions are put in place to help guide staff and their interaction with each other, as well as the players within their programs.

The information within these documents outline the legal positions of certain actions and behaviours and allow for informed decisions in relation to the AFLW environments.

“Being an Adult”

It is important to remember that to be an “adult”, a player is to be 18 years old, however for certain things, the legal age can be younger. The following considerations should be made when working with young players within the Club:

Alcohol:

An individual must be 18 years old in order to buy and drink alcohol in licensed premises. Drinking on private premises, where the alcohol is provided by a teammate etc., and no parental permission has been granted is also considered against the law. The Club should be mindful of this responsibility to the young player at any club events or gatherings.

Driving:

The minimum age at which an individual can gain their provisional or probationary licence (P’s) can be different, depending on the state they have gained their licence. For example, in the Northern Territory, it can be 16 years and 6 months, while in Victoria it is 18 years of age. Most other States are 17 years old. There are also probationary rules for the driver, that may change on a State basis. Being mindful of the young players classifications may be important.

Age of Consent:

The age of consent for sexual relationships is the same for same-sex and heterosexual relationships. Under State Law, a person aged 16 or older can validly consent to sex with any person, except a person who is in a position of authority over them. This means that the general age of consent is 16. A person aged between 12 and 16 cannot validly consent to sex with a person who is more than two years older than them, even if they agree.

Health Care:

Young people can consent to medical treatment from the age of 16, however they do not have the automatic right to refuse treatment, especially in life-saving treatment. From the age of 18, they are able to provide full legal consent, and can also refuse it.
Role of the PDM

Support for the Young Player:

When a player is drafted to the club, one of the first people they meet with is the Clubs Player Development Manager (PDM). The role of the PDM is to facilitate and coordinate the support of the players off-field endeavours. This includes personal and professional development, education, vocation and career development, and wellbeing. With this role secondary responsibilities arise, that may include coordinating housing and relocation, and relationship management.

Being in a supportive role, players and staff members may look to the PDM for support and guidance in managing young players on their club lists. As the young players are most likely still living at home, and in the guardianship of their parents, the PDM may become the key contact for families when supporting the player. The support needed for the player is well within the role of the PDM, however the PDM needs to ensure that appropriate role boundaries are put in place so that they don’t take on a guardianship responsibility to the player in the club environment.

The PDM should consider their professional practice in reference to the Player Development Principles of Best Practice. In particular, considerations towards professional relationships with young players, to ensure that appropriate working relationships and expectations are developed from the start. Clear boundaries in regards to what is the Clubs responsibility in managing the young player, and where the role of the PDM’s support lies is important.

The PDM is a point of call for the player when transitioning into the club, supported by communication with football managers, the player, as well as the players parents. This may also include supporting the development of life skills needed in the AFLW environment. The players family is a key point of support for the player, and the PDM may act as a link between them and the club.

Managing the young person within the club should not fall solely on the PDM. The responsibility to care for the young person is not just the PDMs responsibility, but one that is considered by all those within the club. It is a collaboration of professional support provided by the Club Staff in conjunction with the player and their parents.
Safeguarding Young People into Practice – AFLW Scenario:

The following AFLW based scenarios and practice notes have been developed for consideration from the AFL Safeguarding Children and Young People Policy. They are to be used as a guide for managing different circumstances within the club environment, to ensure safe and effective practice in supporting young players. Different situations may arise throughout the pre-season, therefore it is important to refer to the Policy and be mindful of the practice notes provided. There may be times when you are required to reflect and implement “safe conduct” in scenarios that present themselves.

Scenario One: Meeting with Players

The nature of football requires players to meet for various reasons; whether it be a team meeting to discuss training and game plans, opportunities for feedback and development, or for wellbeing and personal development reasons. These meetings can often require one on one conversations, as staff member’s provide personalised consultation to the players needs and skill sets. Players may also look to have private conversations with staff members to seek help and support.

When meeting with young players, one on one consultation can pose identified risks to both individuals involved. Meeting one on one may seem harmless, and is something that is done with players regularly in order to fulfill role responsibilities, however it is important to protect yourself and the young person in these situations.

Practices should be put in place when players and staff are meeting with young players to ensure the safety of both parties. This also applies for players meeting one on one when a young person is involved.

Safeguarding Young People in Practice:

- Do not meet with young players 1:1 in a private location.
- If you have to meet privately, such as an office, leave the door open and try to remain in sight of others.
- In some cases, it might be possible to invite a parent, staff member, or player to a meeting.
- Where possible have more than 1 adult. If appropriate, you might meet with 2 young players at a time.
- It is recommended that you meet the young player in a public place, such as a coffee shop or sidelines at training.
- This may not be achievable for player development and wellbeing conversations but must be practiced for football operations and coaching conversations.
Scenario Two: Rooming

There are a number of scenarios that will require a young player to be traveling and staying away from home. Whether it be an interstate player visiting a club, early stages of relocation, pre-season trip, or if selected away game interstate. All these circumstances require consideration when organising and allocating rooms/accommodation for the young player to stay.

Players that are new to the squad can quite often be teamed up to room with other players to assist in familiarisation of team culture and values, as well as building relationships. When a young person is involved, staff must be mindful of the potential vulnerabilities of a young person, and who they are buddied up with to room with.

Safeguarding Young People in Practice:
- Be mindful of sleeping arrangements at the accommodation. Are players required to share a room or do they have separate sleeping areas?
- Room players of similar ages rather than in social groups etc. Where possible, room young players together. If not possible, players can be assigned a single room.
- Best practice is for the players to only go in their allocated room, respect others space. This can sometimes be hard with players wanting to socialise in their down time.
- Advise the players to meet in public space, avoiding 1:1 with young players and if a young player leaves the hotel, they MUST tell the PDM or another staff member.

Scenario Three: Travel

A young player who has joined the club may not have their licence or a car to transport them to and from training, team and individual meetings or club events. If this is the case, players and staff may offer up lifts to assist in getting the young person to where they need to be.

A scenario such as this could be an interstate player arriving at the airport, or player coming in to stay and train from a country town. Staff and players must be mindful of the practices recommended in allowing a young person to travel with them. It might be useful to consider a transport document that is signed prior to travel and kept with the PDM.

Safeguarding Young People in Practice:
- Look to avoid 1:1 travel where possible, if you are able to take someone with you when travelling in a car, do so.
- Communicate with the parent to ensure the young player has permission to travel with the allocated individual.
- Communicate times of departure/arrival with parents and team co-ordinators
- Do not make unscheduled stops while the travelling.
Scenario Three: Changerooms

It is important to minimise the risk to young players in vulnerable situations to ensure that the young player feels safe and included. A place of potential vulnerability could be the changerooms, due to its purpose and potential set up. Changerooms are used for multiple reasons, to gather as a group, access the medical team, as well as store belongs, shower and change. Depending on the layout of the change room, there may be exposed showers and change areas, that may create vulnerabilities for young players gathered with adults.

It is important for players an staff to be mindful of the changeroom environment, and put into place any practices that may reduce the risk of vulnerability to young players.

Safeguarding Young People in Practice:

• Assess the appropriateness of any staff member being around the changerooms.
• Anyone in the changeroom should have a purpose of being there, moving on anyone who happens to be there and doesn’t need to be.
• Allocate a time when young person can shower and get changed. Knock and announce yourself before entering when young people are changing.
• Remind players that phones and photos in changerooms are not appropriate especially with underage persons present – not everyone is comfortable with photos being taken.
• Remind players of appropriate and respectful behaviours in the changeroom.

Scenario Four: Photography

Taking photos at the football is a big part of the game – whether it be taking a photo to share a moment, or for fan engagement and club promotion. When the photos involved a young player, the context of the photo, reason for taking it, and where it is shared may need to be considered and discussed in order to ensure safe and effective practice.

Both staff and players need to be mindful about the photos they take and keep on their phone if young people are present. For example, on field photos may be more appropriate that those taken in the changerooms.

Safeguarding Young People in Practice:

• Be mindful of who is taking photos and what they are being used for, especially on personal devices.
• Be mindful of the timing of photos – e.g. not in bathers/sports bras at recovery sessions.
• Always ask permission, this is considered good practice, especially if they are to be posted on social media.
Recommendations for Young Players Finishing School Commitments:

The following recommendations have been developed to support players in their final year of schooling. Clubs are asked to put these recommendations into place to ensure a school first approach is taken to balancing study and football commitments. Relocating a player prior to finishing their school commitments can be considered detrimental to the players football/life balance. It is the coach, football manager, PDM and player’s shared responsibility to ensure the recommendations are committed to in order to support the players development and engagement at the club.

Requirements for Supporting School Leavers

1. School First Approach:
   Clubs are required to take a school first approach to player attendance and engagement at the club. They are encouraged to support the players in completing their school commitments through collaboration of needs with the player, their parents/carer, their school (e.g. Yr 12 Coordinator) and the Club.

2. Individual Development Plans:
   Players are to complete an Individual Development Plan (IDP) with their clubs Player Development Manager (PDM), to identify specific needs and support in completing their school commitments. The focus of the IDP should outline the current study commitments, identifying key dates and responsibilities to both school and football. The IDP will also identify any support needs going forward, such as relocation, ongoing study, or potential work opportunities.

3. Completing Year 12 Examinations:
   Players still completing their year 12 studies via examinations are expected to attend one (1) training per week. Players are allowed to attend one (1) optional training session per week is also permitted, but no more than two (2) sessions for the week. It is the players decision whether they attend that additional session per week or not. This session can be at the club or a home program. Flexibility with attendance is expected during the players exam period.

4. Player Relocation:
   A player cannot relocate to a Club until their last exam is completed. For those not completing exams, relocation may be managed on an individual basis.

5. Additional Requirements/Opportunities:
   • Players from interstate or remote locations may continue to train with their home-based clubs until they can relocate to their AFLW Club. (E.g. NAB League or Academy).
   • Players may attend any additional training sessions in their September/Oct School holidays. The decision to do so must be optional, and managed through plans made in player IDP.
   • Players are required to attend New Player Induction (virtually) on 4th September.
   • Players also have access to the AFLPA New Player Induction Program, that can be completed in their first year in AFLW.

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<tr>
<th>2021 School Exam Period</th>
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<tr>
<td>NSW/ACT</td>
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<td>TAS</td>
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Support through the Talent Pathways

New young players may have limited time with the club due to finishing their school commitments. The time they do have may be prioritised to medical and training requirements, which can influence the PDMs ability to gain information and assess support needs for the incoming player to the club. It may be appropriate to link in with the wellbeing coordinators at the young players club or academy.

These wellbeing coordinators will have a relationship with the player, and may be able to work with their new clubs in supporting their wellbeing and other responsibilities if access to the player is limited. In doing so, players must provide consent in sharing any information. Talk to the player about how you might be able to make this connection work for them and the support being provided.

For those players being recruited from country or interstate clubs/academies, having access to training facilities may be needed, while they finish their schooling. Home clubs/academies may be able to assist in this.

**NAB League Wellbeing Coordinators**
Marty Ryan - Bendigo Pioneers
Ann Steel - Calder Cannons
Adele White - Dandenong Stingrays
Todd Mahoney - Eastern Ranges
Emily Shears - Geelong Falcons
David Hobbs - Gippsland Power
Sarah Godfrey - GWV Rebels
Nick Buscombe - GWV Rebels
Sarah Osborne - Murray Bushrangers
Natascha Newton - Northern Knights
Heath Black - Oakleigh Chargers
Michael Harper - Sandringham Dragons
Emilie Burgess - Tasmania Devils
Jack Rhodes - Western Jets

**State Academy Wellbeing Coordinators:**
Sam Cox – WA
Emma McPherson – SA
Sophie Knights – Allies (NT/NSW/ACT)
Chris Haddock – QLD
Nicky Couston – AFLW National Academy