



**FOOTBALL**  
**SOUTH**  
**AUSTRALIA**

# **Child Safe Environment Requirements**

**Implemented January 2013**

**Updated November 2019**

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## **BACKGROUND**

Football SA is an organisation that is committed to fostering an environment where children feel respected, valued and encouraged to reach their full potential. A child safe and child friendly environment minimises the risk to children from physical, sexual, emotional and psychological harm and/or neglect.

Football Federation Australia (FFA) provides a comprehensive Membership Protection Policy, which FOOTBALL SA and all affiliated associations are required to implement. The policy aims to ensure that every person involved in our sport is treated with respect, dignity and is safe and protected from abuse.

On 22 October 2018 some of the requirements to create and maintain a child safe environment were removed from the *Children's Protection Act 1993 and replaced by the Children and Young People (Safety) Act 2017*. New, stronger laws for people volunteering with children have been implemented into law following recommendations as part of Federal and South Australian royal commissions into child abuse and child protection systems to help keep children safe in our community.

All clubs and associations that are affiliated to Football SA and that provide services to children and young people Under 18 years of age will be required to implement the requirements that are outlined in this document.

## **CHILD SAFE ENVIRONMENT COMPLIANCE REQUIREMENTS**

### **a. Lodging a Compliance Statement.**

All clubs that provide services to children and young people Under 18 years of age must lodge a Child Safe Environment Compliance Statement with the Department for Education to confirm appropriate child safe environment policies and procedures are in place.

A single compliance statement on behalf of all clubs and affiliated associations will be submitted by Football SA. This compliance statement stipulates that all affiliated clubs and associations implement and abide by the child safe environment policies and procedures.

### **Action:**

All affiliated clubs must complete the Child Safe Compliance Statement as outlined in Appendix A. This statement must be completed and submitted to Football SA, within the specified timeframe stipulated by Football SA, by any club that provide services to children and young people Under 18 years of age.

The adoption of a single compliance statement will ensure consistency across the whole of the sport. The single compliance statement also means that each individual club and/or association is not required to submit such a statement.

**b. Working with Children Checks (WWCC)**

South Australia has introduced stronger, more effective and transparent screening laws for people working or volunteering with children. The new laws mean that, from 1 July 2019, everyone working or volunteering with children must have valid child-related screening.

These changes were recommended as part of South Australian and federal royal commissions, to help keep children safe in our communities.

The Working with Children Checks (WWCC) will replace all other child screening checks including the National Police Certificates. Football SA stipulates that any person that holds a 'Prescribed Position', as outlined below, involving a person Under 18, must have a WWCC;

**A prescribed position is:**

- All people who have contact with children or work in close proximity to children and are not directly supervised;
- Manage or supervise volunteers or paid staff that work with children;
- Have access to records in relation to children.

**A person is not required to have a WWCC if they;**

- work for SA Police or the Australian Federal Police;
- work in the same capacity as a child (e.g. you work at a checkout in a supermarket that also hires people under 18 in the same type of role);
- don't work with children for more than seven days (consecutive or not) in a calendar year\*;
- live interstate, have a current child-related check from your home state, and are working at an organised event in South Australia lasting no more than 10 consecutive days;
- are under the age of 14.

\*The seven-day exclusion does not apply if the person is involved with an overnight activity (e.g. end of season camp) or has close contact with children with disability.

Football SA has already developed a policy relating to the WWCC. This policy clearly outlines who needs to complete a WWCC and the process that needs to be undertaken to obtain such a screening.

**Action:**

Implement the Football SA policy relating to WWCC.

**c. Mandated Notifiers**

The *Children and Young People (Safety) Act 2017* makes it a legal requirement for certain people to report a reasonable suspicion or incidences of abuse or neglect. This obligation is known as mandatory notification and a penalty may stem from an individual's failure to comply.

Notifications must be made to the Families SA *Child Abuse Report Line on 13 14 78*.

**Definition**

Mandated notifiers are an employee of, or volunteer in, a government or non-government organisation that provides health, welfare, education, sporting or recreational, childcare or residential services wholly or partly for children.

These people:

- are engaged in the actual delivery of those services to children, or
- hold a management position in the relevant organisation the duties of which include direct responsibility for, or direct supervision of, the provision of those services to children.

Based on the above definition, coaches, trainers, managers, any person that is providing services to children and leaders within the club are required by law to report abuse or neglect of children.

**Action:**

All clubs are to identify and inform the relevant people within the club of their legal obligation to be a mandated notifier.

**SUMMARY OF REQUIREMENTS**

To ensure that your club is child safe compliant, the following requirements are to be implemented:

- Read and discuss the contents of this document with your club and/or association board/committee.

- Your club is to sign the compliance form as outlined in Appendix A agreeing to abide by the FFA Member Protection policy and the adoption of policies and procedures relating to Child Safe Environments.
- Your club and/or association is required to communicate with your members the adoption of the FFA Member Protection and Child Safe Environment processes and procedures either by placing the documents on your club's or association's website or by posting a link direct to the Football SA website for access to the information.
- Ensure that your organisation is registered with the Department for Human Services Screening Unit for the purpose of registering volunteers to your club/association.
- Ensure that the information relating to Working with Children Check's (WWCC) is presented to your members and ensure that all appointed volunteers, that is required to have a WWCC, registers for the WWCC and provides the details to the club/association.
- The club or association is to nominate at least one person to become a Child Safe Officer (CSO) and ensure that this person undertakes the required training. CSO training is available through [the Office for Recreation and Sport](#). Once they have been appointed and have undertaken the training add this person's photo to the 'Our Club: Supports Kids' poster.
- Interview and seek references for all volunteers that are to be appointed to your club.
- Ensure that all club volunteers are registered through the PlayFootball Registration System and enter their WWCC information during the registration process.
- Provide all volunteers with an induction session and information pack relating to their role at your club.
- Ensure all volunteers are provided with a Code of Conduct and access to all other Football SA policies including the FFA Member Protection Policy.
- Encourage all volunteers to undertake the FREE online training available through [www.playbytherules.net.au](http://www.playbytherules.net.au).

- Undertake a risk assessment of the club's facilities and practices to identify any potential risks to the safety of children. Address any identified risks as soon as possible. Keep a register of your club's actions.
- Engage children and young people so they can have a say on issues that impact their involvement. This may simply be through feedback forms or you may consider other opportunities.
- Ensure that all club members are aware of the process to raise a grievance within the club.
- Build and maintain a commitment to provide a child safe environment which is embedded in the club's culture. This will ensure the club is a safe and welcoming place for children and young people.

#### **FURTHER INFORMATION**

If your club or association requires any further assistance regarding this document or the requirements outlined in this document, please contact Football SA.

Further Information can also be gained by clicking on the links below;

Department for Education and Child Development

<https://www.decd.sa.gov.au/child-protection/child-safe-environments>

Office for Recreation and Sport

[https://ors.sa.gov.au/sport\\_and\\_recreation/child\\_safety\\_and\\_member\\_protection/create\\_a\\_child\\_safe\\_environment](https://ors.sa.gov.au/sport_and_recreation/child_safety_and_member_protection/create_a_child_safe_environment)

Department of Human Services

<https://screening.sa.gov.au/types-of-check/new-working-with-children-checks>

Play by the Rules

<https://www.playbytherules.net.au/>





## **FOOTBALL SA COMPLAINTS PROCESS**

### **Rationale**

Football SA is committed to providing a high-quality service to all our stakeholders. If a stakeholder has a complaint, it needs to be addressed firstly with the party that the complaint relates to, this may be a club or affiliated association. If the complaint is not addressed at this level, it can then be referred to Football SA so that appropriate action may be implemented.

Complaints may vary in severity and complexity and may be addressed informally or formally. Any complaint received should be addressed in a timely manner and should not be avoided as it may result in a minor complaint becoming significant. Football SA aims to provide consistency and fair handling of all complaints through this procedure.

### **Required Outcome 1:**

To ensure that all clubs and affiliated associations abide by the Football Federation Australia (FFA) and Football SA Competition Rules and Regulations, policies and procedures.

### **Required Outcome 2:**

To provide a clear and concise complaints process including an appeal process.

### **Required Outcome 3:**

To provide consistency and fair handling of all complaints.

## **COMPLAINT PROCESS**

### **Prior to Submitting a Formal Complaint to Football SA.**

1. Prior to contacting Football SA in relation to a complaint, the complainant should consider whether the matter has been addressed with the person/s concerned. If the complaint is in relation to a club or association, in the first instance, the club and/or association should be provided with the opportunity to resolve the matter.
2. In submitting a complaint to a club or association, this may in the first instance be undertaken informally. This may involve having a conversation with the relevant person about the complaint/grievance. If the matter is resolved no further action is required.

3. If the matter cannot be resolved informally, the complaint/grievance should be submitted in writing to the relevant party outlining the nature of the complaint and the outcome that is sought. Any formal correspondence should provide a timeframe for a response, normally 7 days. If the matter is resolved no further action is required.
4. If the complaint/grievance is not resolved by the club/association following informal and formal process, a formal complaint may be made to Football SA. Prior to doing so, a person may contact Football SA to determine if the matter can be resolved without making a formal complaint. In undertaking this process the Football SA will only provide advice; a determination will not be made or tell the person what action they should or should not undertake.

#### **Submission of a Formal Complaint to Football SA.**

1. All complaints are to be submitted in writing. The information should be specific and provide details relating to the actual complaint.
2. If the complaint/grievance is in relation to a competition matter, it should be addressed to the relevant Competition Administrator. Please note that Football SA Competition Staff will not address matters with individuals if they have not been addressed through their club.
3. If the complainant is unsure who the matter is to be addressed to, they may contact the Football SA for further information.

#### **Investigating a Complaint**

1. Once the complaint/grievance has been received, it will be reviewed and investigated. Investigation may entail requesting additional information, referring the matter to another person within the organisation or referring the matter to the Football SA Grievance and Disciplinary Committee.
2. If the matter is not referred to the Grievance/Disciplinary Committee and a determination is made, a written response relating to the findings and the action to be implemented will be conveyed to the complainant.

#### **Grievance/Disciplinary Committee**

1. Football SA Grievance and Disciplinary Committee is an independent body.
2. If the matter is referred to this committee, a hearing date and time will be conveyed to the complainant.

3. The complainant and any witnesses, where applicable, will be required to attend the hearing.
4. The Grievance and Disciplinary Committee will hear the matter and provide a finding. The outcome of the hearing may be provided verbally at the hearing. All findings will be provided in writing to the complainant within 7 days, where possible.

### **Appeal Process**

1. A person may appeal a decision of Football SA or the Grievance and Disciplinary Committee in accordance with the National Disciplinary Regulations and Football SA Grievance and Disciplinary Regulations.
2. To lodge an appeal, the appeal must be submitted on the prescribed form and must be accompanied by the appeal fee.
3. On receipt of the appeal, Football SA will refer the matter to the Appeal Committee.
4. An Appeal Hearing will be scheduled and notified to the person who submitted the appeal.
5. The Appeal Committee will hear the matter and provide a finding. The outcome of the hearing may be provided verbally at the hearing. All findings will be provided in writing to the complainant within 7 days, where possible.

### **National Grievance Procedure**

1. If a complainant is not satisfied with the outcome of the above process, a grievance may be submitted to the FFA in accordance with the National Grievance Resolution Regulations.