



# QBA CHILD SAFE POLICY

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# Child Safe Strategy

## Introduction

Creating safe and supportive service environments for children is everyone's business. The Queensland Bridge Association Inc. ("QBA") is committed to providing a high standard of service to children, and ensuring they are kept safe from harm. For this purpose, the QBA has developed and implemented a child safe strategy ("CSS"). The strategy has a number of components to

- address our **commitment** to creating a safe and supportive service environment
- strengthen our **capability** to provide such an environment
- assist the QBA to manage any particular **concerns** with respect to the safety and wellbeing of children who are involved with us, and
- promote the **consistency** of our approach to risk management, both internally and with respect to compliance with legislative requirements.

The strategy has eight components, namely:

### **Commitment**

1. A [statement of commitment](#) to the safety and wellbeing of children and the protection of children from harm, and
2. A [code of conduct](#) for interacting with children.

### **Capability**

3. Written procedures for [recruiting, selecting, training and managing staff and volunteers](#).

### **Concerns**

4. Policies and procedures for handling [disclosures or suspicions of harm](#), including reporting guidelines
5. A plan for [managing breaches](#) of our risk management strategy, and
6. Risk management plans for [high-risk activities and special events](#).

### **Consistency**

7. Policies and procedures for managing [compliance with the Blue Card system](#), and
8. Strategies for [communication and support](#).

## SECTION 1 – STATEMENT OF COMMITMENT

# 1. Statement of Commitment

The Queensland Bridge Association provides services to children to assist them to learn and enjoy the game of bridge in a friendly and supportive environment.

The QBA supports the rights of all children and is committed to ensuring their safety and wellbeing, and protecting them from harm. We aim to provide children a safe and supportive service environment. Our staff and volunteers model and encourage behaviours that uphold the dignity, safety and wellbeing of children.

We do this through our policies and procedures for:

Item 1	This Statement of Commitment.
<a href="#">Item 2</a>	Our Code of Conduct for our staff and volunteers interacting with children.
<a href="#">Item 3</a>	Recruiting, selecting, training and managing staff and volunteers.
<a href="#">Item 4</a>	Handling disclosures or suspicions of harm to children, including reporting guidelines. This includes providing an appropriate and timely response to all allegations of harm to a child resulting from the conduct, action or inaction of any person, including staff, volunteers, and others.
<a href="#">Item 5</a>	Managing contraventions of the risk management strategy.
<a href="#">Item 6</a>	Carrying out Blue Cards checks and associated issues.
<a href="#">Item 7</a>	Managing the risks associated with high-risk activities and special events.
<a href="#">Item 8</a>	Providing communication and support for implementing our risk management strategy.

## 2. CODE OF CONDUCT

**“Children are entitled to be safe and protected”**

### A. CONTEXT OF THIS CODE

The QBA has adopted and implemented this code of conduct so that we have clear policies and procedures that:

- set behavioural standards towards children,
- outline behaviours towards children that we consider unacceptable, including concerning conduct, misconduct or criminal conduct,
- Include a specific requirement to report any concerns, breaches or suspected breaches of the code to a person responsible for handling complaints in the QBA or to an external authority when required by law and/or the QBA’s child protection policy, and
- outline the protections available to individuals who make complaints or reports in good faith to the QBA in respect to child-related work.

Furthermore, Queensland's Working with Children (Risk Management and Screening) Act 2000 and Regulation 2020 require certain organisations to develop and implement a written strategy for employment practices and procedures that:

- promotes the wellbeing of children; and
- protects children from harm.

This Code has been developed to assist the QBA in meeting all these requirements.

### B. ABOUT THIS CODE

#### WHO DOES THIS CODE APPLY TO?

1. This Code applies to:
  - a. all persons who have an agreement with the QBA to carry out work. For this purpose, it is immaterial
    - i. Whether the agreement is written or unwritten; and
    - ii. Whether the work is carried out voluntarily or for financial reward; and
    - iii. What a person’s motivation is for carrying out the work; and
    - iv. The time for which the person is engaged to carry out the work; and
    - v. Whether the agreement provides for the person to carry out work on 1 occasion or on an ongoing basis, whether regularly or irregularly.
    - vi. What is the nature of the work.
  - b. both QBA **staff** and QBA **volunteers** (as defined in the Key Terms in Section F).

## SECTION 2 – CODE OF CONDUCT

- c. those who have agreed, or are deemed to have agreed, that the Code applies to them. This may arise, for example, if a person has become a member of a bridge club and it is a condition of that club's membership that the member agrees to this Code.
2. The Code applies to any other person who interacts with the QBA where it would be reasonable to do so. Such persons may include:
  - a. bridge players (including players who are under 18)
  - b. parents
  - c. visitors
  - d. spectatorsin respect to a QBA activity to the extent they are not already bound by this Code.

### **WHEN DOES THIS CODE APPLY?**

3. This Code applies to persons undertaking their role with, or interacting with, the QBA or its activities. This includes, but is not limited to:
  - a. behaviour that includes, relates to, or impacts upon a person who the staff member or volunteer has contact with in their role at the QBA; and
  - b. behaviour that occurs in a physical or online environment.

Reference to **children** within this Code applies when the person's interaction with a child is as a result of their role connected to, or their involvement with, the QBA or its activities.

### **4. RELATIONSHIP WITH OTHER CODES OF CONDUCT, SIMILAR REQUIREMENTS OR LAW**

It is recognised that staff and volunteers may be subject to more than one Code of Conduct or similar requirement. If an apparent contradiction occurs between this Code and any other code or requirements (eg legislation, policy, procedures etc.), advice can be sought from the QBA Manager. If there is a contradiction with law, the law will prevail.

Role specific requirements not detailed in this Code may be dealt with by the QBA in supporting or additional documentation.

## SECTION 2 – CODE OF CONDUCT

### 5. FORMAT AND PRESENTATION

The relevant sections of this Code consist of three parts:

- The *Preamble* introduces the section.
- The *Standards* state the expectations for personal behaviour and the provision of service.
- The *Guidelines* explain and illustrate best practice, highlighting practical ways to achieve this.

Throughout the Code, all Key Terms appear in **bold text** the first time they appear, with Key Terms defined in Section F.

## C. IMPLEMENTING THIS CODE

### PREAMBLE

6. This Code will only be effective if it is widely known and available throughout the QBA, implemented, and practised.
7. The absence of any reference to particular conduct in this Code does not imply that that conduct is acceptable for staff or volunteers.
8. All staff and volunteers have a responsibility to act when behaviour at a QBA activity is inconsistent with this Code.
9. Where a staff member or volunteer does not meet the standards of this Code, this will indicate an area requiring redress. This may result in formal disciplinary action as a breach of employment/engagement conditions.
10. Staff and volunteers are encouraged to follow the **guidelines** of this Code. Where this is impractical, an exercise of judgement will be required to ensure the safety and wellbeing of those with whom they work and themselves. Disregard of the guidelines may indicate an area where staff and volunteers require guidance and specialised help, or may indicate a breach of the standards and be managed as such.

## SECTION 2 – CODE OF CONDUCT STANDARDS

11. It is the responsibility of each staff member and volunteer to be aware of and meet the standards of this Code.
12. If you have **appropriate authority** in the QBA, ensure all staff and volunteers for whom you are responsible are made aware of this Code.
13. Do not penalise, discriminate or take action against other staff or volunteers because of any action taken in good faith under this Code

## GUIDELINES

14. If you are aware of behaviour of a staff member, volunteer or visitor to the QBA or a QBA event, or of a child that leads to you or others feeling uncomfortable or concerned, speak to an appropriate authority.

If you have reason to believe a member of staff or a volunteer has not met a standard or guideline of this Code, always inform an appropriate authority if you consider

- a. a person (other than a child) may have suffered harm or has been placed at risk of harm; **or**
- b. the staff member or volunteer is persisting in disregarding the standard or guideline.

Where neither a) nor b) apply, you can approach the staff member or volunteer and identify the concern.

Note: This section does not apply to matters where a child may have suffered or is at risk of harm. Matters of children's safety are addressed later in this Code.

## SECTION 2 – CODE OF CONDUCT

### D. CONDUCT WITH CHILDREN

#### PREAMBLE

15. Children are entitled to be safe and protected. They have the right to be respected, listened to and their particular needs addressed in all QBA activities.
16. Service provision where children are involved requires absolute trustworthiness.
17. Staff and volunteers with appropriate authority with the QBA have a responsibility, that cannot be delegated, for the implementation and maintenance of proper systems for the safety and welfare of children.
18. When they are exercising a **service** in a QBA activity, staff and volunteers have responsibility for the safety and welfare of children in their care.
19. Any form of **child abuse** is always wrong (refer to information in Key Term '**Abuse**'). Staff and volunteers have authority over children because of their position, and have power because of their greater age, maturity, physical size and life experience. Abuse arises from the misuse of authority or power.
20. Due to the inherent imbalance of power, children are incapable of giving valid consent to abuse.

#### STANDARDS

21. If you have appropriate authority with the QBA, ensure:
  - a. proper systems for the safety and welfare of children participating in the QBA activity are implemented and maintained;
  - b. applicable requirements of the **civil authorities** and the QBA are complied with; and
  - c. all staff and volunteers for whom you have responsibility and who work with children:
    - i. Comply with all civil and QBA screening and selection requirements;
    - ii. receive periodic training in child protection; and
    - iii. are aware of the provisions of this Code.

## SECTION 2 – CODE OF CONDUCT

22. Take reasonable steps to ensure the safety and wellbeing of the children in your care.
23. Do not abuse children.
24. Do not administer **corporal punishment** to children in your care.
25. Do not make available to children any **prohibited material**. This includes enabling access inadvertently; for example, allowing a child to use your computer where prohibited material is located.
26. Before accepting your appointment as an employee or commencing as a volunteer, you are to disclose to a person with appropriate authority if you:
  - a. are currently charged with or convicted of an offence against a child;
  - b. have been acquitted of a charge of an offence against a child;
  - c. have had a charge of an offence against a child not proceed;
  - d. have had a prohibited status under applicable 'working with children' screening legislation lifted; or
  - e. have been the subject of any disciplinary proceedings involving child abuse.
27. Before allowing a person who:
  - a. is currently charged with or convicted of an offence against a child;
  - b. has been acquitted of a charge of an offence against a child;
  - c. has had a charge of an offence against a child not proceed;
  - d. has had a prohibited status under applicable 'working with children' screening legislation lifted; or
  - e. has been the subject of any disciplinary proceedings involving child abuse;

to participate in activities involving children:

  - consult with the Manager of the QBA (or the QBA President), and
  - ensure a risk assessment is undertaken; and
  - be reasonably satisfied no child will be at an increased risk of harm.

## SECTION 2 – CODE OF CONDUCT

28. Following your appointment or commencement, if you are aware of behaviour of a staff member, volunteer or visitor to the QBA activity, or of a child, that leads to you or others feeling uncomfortable or concerned, speak to an appropriate authority.

If you know or reasonably suspect a child has been harmed or is at risk of harm from abuse, or if you know or reasonably suspect a staff member or volunteer has demonstrated **inappropriate behaviour**, comply with your roles and responsibilities as detailed in, but not limited to the QBA's Child Safe Strategy.

### GUIDELINES

29. Avoid situations where you are vulnerable and where your conduct may be construed as a breach of the standards of conduct in this Code.

### RECOGNISING THE CHARACTERISTICS AND EFFECTS OF CHILD ABUSE

30. Be aware of the signs, symptoms and characteristics of child abuse and its impact on children (refer to information in Key Term 'Abuse').
31. If you have appropriate authority with the QBA, ensure:
- there is a strategy to prevent child abuse from occurring during QBA activities. This includes giving age/developmentally appropriate information to children; and
  - Parents or guardians are advised that abuse of any child will not be tolerated.

### RECOGNISING THE CHARACTERISTICS OF SEXUAL OFFENDERS

32. Be aware of the **characteristics of sexual offenders**. A sexual offender may be a friend, family member, neighbour, peer, or a person in authority.

### ENSURING THE SAFETY OF CHILDREN

33. Taking all reasonable steps to ensure the safety and welfare of children for whom you have responsibility, or are in your care, requires you to prepare or agree to, where relevant, a **risk management plan**, and the QBA **child safe strategy**.

## SECTION 2 – CODE OF CONDUCT

### SCREENING AND SELECTION OF PERSONNEL

34. If you have responsibility for compliance with screening and selection requirements, exercise care with the selection of staff and volunteers involved in mixed age or children's activities. Ensure relevant staff members or volunteers assisting with these activities agree with this Code of Conduct and have been screened as per the requirements of civil or other relevant authorities.

### YOUR ROLE AND YOUR CAPACITY OR APPROPRIATENESS TO ACT

35. Recognise your limits and do not provide any service beyond your competence or certification. Arrange for any such service to be provided by an experienced person or specialist agency.
36. Children should be able to trust and confide in staff and volunteers, and you should expect to develop relationships of this nature. Avoid fostering inappropriate dependence on the part of a child.
37. Consideration must be applied before providing service to a child with whom you already have a close personal relationship, such as a friend or member of your family. Care is needed because confusion between these relationships can lead to a loss of objectivity, failure to act in the other's best interest and harm to both parties.
38. Avoid behaviour that could give the impression of favouritism and inappropriate special relationships, particularly with individual children.
- a. Limit your contact/business with individual children to the work you are expected or encouraged to do for the QBA. Keep communications with an individual child to an absolute minimum.
  - b. The QBA accepts that the most effective bridge partnerships will usually involve considerable interaction on a one-on-one basis between two bridge players. However, there are potential issues in having considerable interaction on a one-on-one basis where one of the persons involved is a child and the other is an adult. Avoid developing a situation where a child has a substantial interaction with a single adult individual. There are two exceptions to this:
    - i. Where the adult is of similar age, say, no more than 1 or 2 years older than the person who is under 18, or
    - ii. The QBA Manager is informed of the situation, and the QBA puts in place a written risk management strategy to manage the situation.

## SECTION 2 – CODE OF CONDUCT

- c. If you contact or have business with an individual child outside your QBA role, ensure that
    - i. a parent of the child, and
    - ii. the QBA managerknows of, and agrees to, such contact/business. Example: If you and the child are undertaking a social outing.
  - d. It is generally inappropriate to give an individual child a gift, unless that is carried out in a group setting. Example. It is appropriate to have some bridge competition and, in the presence of the group of children or young persons who competed in the competition, make a gift to an individual child.
39. Do not invite, accept or otherwise engage with children using personal social media (including direct messaging and Facebook friend requests) other than for the proper purposes of undertaking work you are expected or encouraged to do for the QBA.
40. Outside of your role with the QBA, do not provide care (eg childminding) to children you have a relationship with as a result of your role.
41. Encourage children to develop leadership skills and undertake leadership roles that are appropriate for their age and development.

### **USE OF EXTERNAL SERVICE PROVIDERS**

42. When you engage or use an external service provider for an activity (eg when you engage a specialist or a speaker for a coaching or mentoring session):
- a. make reasonable enquiries as to whether they have been screened and selected in accordance with civil and any QBA requirements;
  - b. ensure they are only used in a supplemental capacity; and
  - c. wherever practicable ensure they are not left alone with any child

## SECTION 2 – CODE OF CONDUCT SUPERVISION

43. The degree of supervision required will vary according to the nature and environment of the activity, the age and maturity of the children, and the size of the group. Having multiple staff and volunteers to ensure supervision and accountability standards are maintained is important.

Given this:

- a. clearly distinguish the different levels of responsibility between you and any other staff/volunteers and ensure these differences are understood;
- b. consider the extent of supervision required, taking into account:
  1. the age, number, ability and gender mix of the children; and
  2. the venue, time, duration and nature of the activity;
  3. The makeup of the group of supervisors and the experience and circumstances of the persons within that group.
- c. have a register, or know how to access a register, of all children, including the name and contact details of parents, guardians and emergency contacts; and
- d. consider and periodically review the application of QBA child protection procedures.

44. Children who attend QBA activities are generally sufficiently old to be left at the activity without a parent being present. If the organiser of the activity considers a parent is required to stay, that should be communicated in a clear manner and agreed to by the parent. If the parent (or an appropriate nominee) is not willing or able to stay, the child should not be allowed to attend the QBA activity.

45. If a parent (or someone nominated by them) does not collect a child at the end of an activity, take appropriate steps to ensure the child safely returns home. A child of 15 years or more can, in the absence of special circumstances, be allowed to make their own way home, provided you are reasonably satisfied they have sufficient time and money (to catch public transport) to get home by sunset, and have considered safety of location, route of journey, etc.

46. If there is an issue during the process of a child being collected by their parent or nominee (eg the person collecting the child is violent or intoxicated) take steps to protect the child - in some cases it may be appropriate to contact the police.

## SECTION 2 – CODE OF CONDUCT ACTIVITIES

47. Identify and minimise all potential hazards before embarking on any activity with children. This is commonly referred to as a risk assessment and would include:
- a. being aware of the fire safety and evacuation procedures;
  - b. ensuring emergency exits at the venues where the QBA activity occurs are clearly marked and never obstructed or internally locked;
  - c. not permitting smoking in any premises where the activity is held; and
  - d. not knowingly permitting people with serious contagious diseases to attend the activity.
48. Assess games or activities that emphasise gender, physical, intellectual or ethnic differences for their appropriateness. Think about what message children may learn from the way events are organised and conducted.
49. Review in their entirety aural and visual materials (such as videos, films, computer games, graphics, photographs and lyrics) to ensure any elements containing violence, sexual activity or lifestyle are appropriate for the intended audience. Exercise care if a film or computer game has been recommended by the Office of Film and Literature Classification as unsuitable for viewing or playing by children of a particular age (eg MA, M and PG classifications). When assessing whether materials are suitable, take into account the age of the youngest child present. If in doubt, seek the advice of a supervisor.
50. To minimise the possibility of children being harmed, give careful consideration to any activities or games that require children to act alone or in pairs, independent of leaders.
51. Ensure no activity involving children includes:
- a. secret initiation rites and ceremonies;
  - b. nudity or engagement in sexual conduct;
  - c. the use or availability of prohibited materials.
52. When taking children away from bridge club or bridge competition premises, obtain the written consent of a parent or guardian, and keep them informed of the place and timing of the event. Where permitted by law, consent may include notification obtained by digital means. If you can, include parents or guardians in a supervision team of mixed gender.

## SECTION 2 – CODE OF CONDUCT

### VENUE

53. Avoid working alone or in isolation with children. Ensure:
- all activities have defined boundaries that are easily observed or patrolled;
  - all aspects of activities are open to observation;
  - children require permission to leave QBA or bridge club or event premises (noting this permission can be for a time period, rather than each occurrence);
  - where individual or small group work is needed, this work occurs in the presence of adults, a public place or a location with high visibility; and
  - you do not invite or have children to your home or visit children in their home when no other adult is present.
54. If arranging to meet a child privately:
- where practicable, have parental or guardian consent (noting this consent can be for a time period, rather than a specific meeting);
  - ensure, where appropriate, that a parent, guardian or suitable adult is present;
  - inform a supervisor of the time, location and duration of the meeting; and
  - hold the meeting in an appropriate venue.

Where a meeting is unplanned, make a record of the time, location, duration and circumstances of the meeting and upon request provide this record to your supervisor.

55. Check venues allow for the privacy of all parties to be respected, particularly when changing clothes, washing and toileting.

### HEALTH AND SAFETY

56. Ensure risk management plans (or risk assessments) include relevant contact details (eg emergency services and specialised help) and a first aid kit appropriate to the activity is available. In the absence of special features, it is appropriate to assume that a bridge club or a commercial venue where a bridge event is being held (eg a bowling club venue) has an adequate first aid kit.
57. Do not administer prescription medications to a child without the written consent of a parent or guardian.

## SECTION 2 – CODE OF CONDUCT

58. Obtain, or be provided with, information from parents or guardians about particular physical and mental health or safety needs of children in your care (eg allergies, depression). Ensure if relevant information is obtained from a parent or guardian (either on a “one-off” basis or on the basis that an advice will continue into the future), such information is known (or is available) to the organiser of the QBA activity. Ensure the staff and volunteers know the required responses to medical conditions (eg they are aware of those persons who have asthma, anaphylaxis or epilepsy, and know the required procedures in the event of the incident. Put in place processes for ensuring medications are used and stored safely (eg medication is labelled and given to staff or volunteers, or they are advised of the medication but the child is supported to access their medication as required).

### TRANSPORT

59. While transporting a child, or a group of children may be required, to the extent practicable, avoid being alone with a child in a motor vehicle or driving a child to or from their home unaccompanied.

60. If you are driving the child at the request of, or with the consent of, a parent or guardian of the child, take reasonable steps to be able to demonstrate to others that they have made such a request or given their consent.

61. In any other case, if being alone in a car or driving unaccompanied with a child is unavoidable, inform another adult of the trip and the reason for it, and make a record of the time, location, duration and circumstances of this transport and provide this record to your supervisor.

62. When making transport arrangements, take reasonable steps to ensure:

- a. all drivers or operators are licensed, responsible, experienced and are not impaired by alcohol or any other mind-altering or addictive substance; and
- b. all motor vehicles and other forms of transport used are registered, insured, safe and fitted with appropriate child restraints or safety devices (eg seat belts).

63. When transporting children, abide by all road rules and laws (eg speed, seat belts are being used).

**SECTION 2 – CODE OF CONDUCT**  
**PHYSICAL CONTACT**

64. In general, excluding circumstances such as immediate physical danger or medical emergency, physical contact should be initiated by the child or occur with their permission. When you make physical contact with a child, be very careful you respect their feelings and privacy.
65. Ensure any physical contact you have with children is of a non-sexual nature and appropriate to the situation. Avoid any physical contact that is sexually stimulating, or may be construed as sexually stimulating. Children may or may not be aware of creating such situations. It is your responsibility to be alert for such situations and cease any inappropriate physical contact immediately.
66. Be very careful when making physical contact with children. Appropriate contact includes, but is not limited to:
- a. assisting with a bridge activity in a normal way (eg to assist a child to hold playing cards); and
  - b. comforting a child by placing an arm around their shoulder and giving a gentle squeeze from the side; and
  - c. patting the child on the head, hand, back or shoulder in affirmation; and
  - d. for a medical purpose, including
    - i. reasonable restraint of a child who is having a seizure, to prevent harm to themselves or others, or
    - ii. to provide some other instance of first aid  
(in which case, any significant physical contact should be documented and reported to a parent of the child and an appropriate authority).
67. Inappropriate contact includes, but is not limited to:
- a. kissing or coaxing a child to kiss you;
  - b. extended hugging or tickling
  - c. touching any area of the body normally covered by a swimming costume, specifically the buttocks, thighs, breasts or groin areas; and
  - d. carrying older children, sitting them on your lap or having them rub up next to you.

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### BEHAVIOURAL GUIDANCE

68. When a child's behaviour requires correction, either for the safety and welfare of themselves or the group, staff and volunteers will:
- a. where the situation permits, precede any action with a warning;
  - b. explain the action to the child;
  - c. give the child an opportunity to explain;
  - d. ensure the action is appropriate to the occasion and age of the child;
  - e. ensure the form of action is not corporal punishment, does not ridicule or humiliate, or is not otherwise abusive;
  - f. ensure very young children are not isolated;
  - g. only use physical restraint necessary and reasonable to protect children from harm or to avoid an accident;
  - h. if physical restraint is used, keep a record that identifies the method of restraint used, the staff member or volunteer, the child involved and any witnesses, and sets out the circumstances of the incident;
  - i. if appropriate, ensure the child's parents or guardians and a supervisor are informed of the circumstances of the incident and the action taken; and
  - j. make a record of the circumstances of the incident and the action taken.
  - k. advise the child, and their parents of what consequences flow from such behaviour.
69. If you have appropriate authority with the QBA, consider if any more specific behavioural guidance policy should be developed, made known and implemented, and if so, carry out such work.

### COMMUNICATION AND TECHNOLOGY

70. Comply with any policies, procedures and guidelines provided by the QBA, regarding the use of technology and related resources, including:
- a. ensuring all access to the internet while attending the bridge activity, using a QBA or bridge club device, or undertaking your role as a staff member or volunteer, is of an approved nature;
  - b. not using QBA/Bridge Club digital communication identities, eg social media or work email accounts, for personal use;

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71. When considering using technology for communication, apply the same principles as you would in any other form of communication with children, ensuring:
- a. it is an appropriate way to communicate with a child;
  - b. it is an appropriate way to communicate about the matter;
  - c. you are sensitive to the impact of your words, images and actions on the child, and any other person who may access it;
  - d. you do not use sexually suggestive, explicit or offensive language or images; and
  - e. the circumstances of the communication, including the language and images used, do not suggest your relationship with the child is inappropriate.
72. Consider the risks associated with using technology in communication with children, including:
- a. ignoring personal security settings on social networking sites;
  - b. disclosing contact details or images of the child in the communication;
  - c. being unable to determine if people are who they say they are;
  - d. exposing the child to unwanted or inappropriate information; the child becoming a victim of cyberbullying; and sexual predators gaining access to the child.
73. Assist children to stay safe when using technology to communicate with others by:
- a. educating children, and their parents or guardians, about the risks associated with the use of this technology;
  - b. encouraging children to exercise care in disclosing personal information about themselves and others, such as their contact details; and
  - c. encouraging children to talk about anything that worries them, including anything they see or experience online, with **appropriate supports**.
74. Do not use the QBA's official sites and social media platforms (eg website, Facebook pages) in a way that brings the QBA or bridge into disrepute. Only authorised persons are to post or comment on websites, Facebook or other social media on behalf of the QBA.

## SECTION 2 – CODE OF CONDUCT

75. If you have appropriate authority with the QBA, consider if any further:
- a. policy for staff and volunteers regarding the use of technology to communicate with children; and
  - b. procedures regarding the approval to use social media for communications and promotions, for use within learning and playing activities, or for other benefit to the QBA.
- should be developed, made known and implemented, and if so, carry out such work

### **PHOTOGRAPHS**

76. In this document, the terms photograph, image, or video are used without distinction.
77. If any further QBA policy and procedures (other than those set out here) apply for the making and use of children's images, follow such further policy and procedures.
78. Images of a child (including a parent's own child) contravene Criminal Codes and censorship laws if the child is photographed in a provocative or sexual manner.
79. In Australia, generally speaking, there is no law restricting photography of people (including children or young persons) in public spaces as long as the images are not:
- a. Indecent;
  - b. being used for voyeurism or made for the purpose of observing and visually recording a person's genital or anal region;
  - c. protected by a court order (eg child custody or witness protection);
  - d. defamatory; or
  - e. being for commercial purposes (a person's likeness is used to endorse or entice people to buy a product).
80. If the QBA has been advised of a court order or other reason (eg child custody or witness protection) why it would be illegal to take or publish a photo of a person, or the QBA has been merely requested not to take or publish a photo of a person, that prohibition or request should be documented and made known to relevant parties.

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81. For further information, see the websites of the eSafety Commissioner [\[CTRL CLICK HERE\]](#) and material at “Play by the Rules” - [\[CTRL CLICK HERE\]](#)
82. However, even if images may be taken and published lawfully, the parents of children naturally may be more sensitive to photo related issues than the general adult population, and this should always be taken into account.
83. Where a bridge event is held at a bridge club, private property, privately owned land, a school or council owned facilities, the owner of such property or venue is able to restrict, ban or require permission of photography anywhere in their venue. Where a bridge event is held at a private property not owned by the QBA, it is good practice to determine a mutually agreed photographing policy. For the avoidance of doubt, note that the QBA does not own bridge playing premises, or control the photo policies of bridge clubs.
84. If a person is taking images inappropriately (eg breaching the restrictions or ban in place for that private property or venue), then venue management should request the person to stop. If the person refuses, the police or security may be called to escort them off the property. If anyone has reasonable concerns that a person (adult or child) is taking images that are indecent or in areas like toilets or change rooms they should contact the police.
85. Strategies - acquiring Images
- a. Only take images for use for appropriate QBA or bridge related purposes, and ensure that the child is suitably clothed;
  - b. If there is an external photographer, do not allow the photographer unsupervised access to children (other than their own child);
  - c. If the main subject of the photo is a child (or children), ensure the photographer (or the person on whose behalf the photographer is acting) takes reasonable steps to inform the children and parent(s) present
    1. That the photo is to be taken, and
    2. If there is anything out of the ordinary that is anticipated in respect to the way the image is to be used, and,
    3. if the image is not to have an indefinite lifespan, how long the image will be retained or displayed.
  - d. If it is required that the consent of the parent or the child is obtained, ensure such consent is obtained;
  - e. Where possible, have the photo taken at the event venue.

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- f. To respect people's privacy, camera phones, videos and cameras are not to be used inside changing areas, showers and toilets which we control or are used in connection with the QBA;
- g. Obtain the consent of parent /guardian and their agreement to be present before approving photo sessions outside the event venue ;
- h. Provide details of who to contact within the QBA or bridge club organisation if concerns or complaints of inappropriate behaviour in taking images or content are raised;
- i. Ensure that the contact person understands the application of relevant legislation and policies (or where to find it);
- j. Provide members of the media and professional photographers with an identification pass to be worn for the duration of major/large events;
- k. Photographers and members of the media need to comply with the law too. Some people may be required to get a Blue Card and some people may not be – depending on their role and where they are working.

### 86. Strategies - displaying and storing images

- a. Consider using models or illustrations for promotional / advertising purposes.
- b. Except to the extent both a parent of the child (and, if the child is 15 or over, the child themselves) consents: -
  - i. If an image is used, avoid naming the child. This includes naming in a caption or tagging on social media. If this is not possible, avoid using both a first name and surname.
  - ii. Avoid displaying personal information such as residential address, email address or telephone numbers or school uniforms if images are being posted on websites or distributed in publications.
  - iii. Do not display information about hobbies, likes/dislikes, school, etc. as this information has the potential to be used as grooming tools by offenders or other persons.
  - iv. Only display or publish photos in bridge related publications (eg QBA or bridge club magazines, Qld Youth Bridge Players Facebook page, or general media (eg Courier Mail). Do not use them for private social purposes.
- c. Clearly outline in a written contract to photographers who are contracted or paid to take photos, who will retain the images taken, include arrangements made for negatives, digital file and proofs and outline any restrictions for use and sale.

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- d. Provide details on request of who to contact and what to do if concerns or complaints of inappropriate image use are raised.
- e. Consider if any special considerations need to be taken into account in storing images, is any time limit to be imposed on how long they are to be stored for, who has access to them, or if any steps are to be taken to prevent reproduction of images.

### RECORD KEEPING

87. If you are providing a service involving children with the QBA, keep a register of attendance of the children for whom you are responsible.
88. If you have appropriate authority with the QBA:
- a. ensure a register of attendance of children, staff and volunteers, and a register of emergency contact details for children, staff and volunteers, is kept;
  - b. include such registers in the QBA archives; and
  - c. keep and store in a secure place all permission forms and records relating to discipline, private meetings and student protection.
89. If you have appropriate authority with the QBA, ensure any screening documents:
- a. are treated with confidentiality and never left where they can be accessed by unauthorised persons;
  - b. where kept electronically, are password protected and stored for any required period of time, with access limited to authorised persons; and
  - c. where kept in paper form, are stored separately from any other documents and locked in a secure place for any required period of time, with access limited to authorised persons.

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### E. ALL CONDUCT

#### PREAMBLE

90. Staff and volunteers have authority conferred upon them by their **appointment** to the QBA. The authority associated with these roles means they have power which is always to be exercised in the service of others, especially children, and to the benefit of the QBA.
91. Abuse is one person's misuse of power over another. Sometimes abuse will be a one off event and at other times it will be a pattern of behaviour. Abuse can take any of several overlapping forms: **bullying, emotional abuse, harassment, physical abuse, or sexual abuse**.
92. To work effectively with others, trust is of primary importance. Trust is supported by maintaining physical, sexual, emotional and psychological boundaries. Staff and volunteers will enhance their ability to maintain these boundaries by attending to their wellbeing.
93. While staff and volunteers often enjoy personal relationships through the QBA, their responsibilities to service with the QBA take precedence.
94. Staff and volunteers are colleagues in service to the QBA: the activity of one inevitably impacts upon others.
95. The role of staff members and volunteers with the QBA may include financial management. This management can have a significant impact on the QBA.
96. Financial integrity is essential to all financial processes and transactions.
97. Staff and volunteers with **appropriate authority for financial management** with the QBA are responsible for the implementation and maintenance of proper systems for financial integrity and accountability.

## SECTION 2 – CODE OF CONDUCT STANDARDS

98. Observe the law. This includes, but is not limited to, the Acts and Regulations that relate to your duties.
99. If you have appropriate authority with the QBA, ensure staff and volunteers for whom you are responsible are provided with:
- a. safe working environment, including safe housing (where housing is provided);
  - b. opportunities to maintain and enhance their relevant skills; and
  - c. personal encouragement, support and regular feedback.
100. Conduct yourself in an ethical and respectful manner. Treat people honestly, fairly, lawfully and without discrimination, and do not behave or communicate in a manner that brings the QBA into disrepute. Your behaviour or communication should reflect well on the QBA and not misuse power or position.
101. Seek at all times, to maintain or enhance confidence in the integrity of the service you perform. Avoid behaviour that gives the impression of favouritism or inappropriate relationships.
102. Do not engage in bullying, emotional abuse, harassment, physical abuse or sexual abuse.
103. Act in the best interests of the children you are providing a service to. You must recognise any potential **conflict of interest** and take steps to resolve it, including consultation with an appropriate authority/supervisor.
104. Do not **inappropriately discriminate** between people.
105. Do not disclose confidential information received in your QBA role to someone else, without the consent of the person providing the information, except where:
- a. the information is known publicly;
  - b. as required or allowed by law; or
  - c. it is in the public interest (such as to avoid the risk of serious injury or harm to any person).
106. When on leave or unable to fulfil your responsibilities through illness or any other reason, make alternative arrangements through advising the appropriate supervisor at the QBA

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107. Be responsible in your use of alcohol and other mind altering or addictive substances or services. This includes not undertaking QBA service when impaired by alcohol or any other mind-altering or addictive substances (including prescription medication) which might impair your ability to care for children or any other person in your care.
108. Seek to ensure players in your care that are
  - a. under 18 do not consume alcohol (unless it is legal to do so and a parent has expressly consented to their child consuming alcohol); and
  - b. 18 or over do not encourage those under 18 to consume alcohol, and any person who does choose to consume alcohol pursuant to these arrangements does so in a prudent manner.
109. Do not organise an event directed mainly towards children, or conduct an activity mainly involving children, if alcohol is to be made available at the event or activity.
110. Smoking is not permitted at any event or activity mainly involving children.
111. Do not use any **prohibited substance**.
112. Do not take property belonging to others, including intellectual property.
113. Do not knowingly make statements that are false, misleading or deceptive.
114. Do not knowingly use **offensive language**.
115. Do not view, possess, produce or distribute **restricted material**, without a legitimate purpose.
116. Do not, as a result of your position or relationships formed as part of your role, seek personal advantage or financial gain for yourself or your family, beyond your stipend or wage, and recognised allowances and deductions.
117. Do not allow yourself to be influenced by offers of money or financial reward.
118. Avoid situations of conflict between personal financial interest and QBA responsibilities.
119. Arrange personal and QBA finances to ensure clear account and transaction boundaries are maintained.
120. Fully disclose and be publicly accountable for all QBA monies you handle.

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121. If you have appropriate authority for financial management with the QBA, ensure:
- a. proper systems for financial integrity and accountability are implemented and maintained;
  - b. all staff and volunteers, for whom you have responsibility and who have authority for financial management in the QBA, are informed of their roles and responsibilities; and
  - c. all stipends, wages and allowances payable are adequate, and paid promptly and in full.

## GUIDELINES

### PERSONAL BEHAVIOUR

122. Be aware of the impact of abuse on people.
123. Be able to identify bullying.
124. If another person indicates by their words or actions that they feel bullied or harassed by you, review your conduct. If in doubt, cease the conduct and seek advice from a supervisor. When coaching/teaching as part of your role, do so respectfully.
125. Be sensitive to the effect of your language on others.
126. Appropriate language includes encouraging, positive words, using a pleasant tone of voice and honest and open communication.
127. Be fair, considerate and honest with all players, officials and team members. Seek to have every player's time spent with you being a positive experience.
128. If you hold a coaching or mentoring role for a group of players, treat each player as an individual by:
- a. Providing each player with reasonable attention and opportunities;
  - b. Respecting the talent, developmental stage and goals of each individual player; and
  - c. Helping each player reach towards his or her full potential.
129. Avoid using language that may be misunderstood or that bullies, threatens, belittles, humiliates or causes unnecessary offence or embarrassment. Avoid gossip and take care when using:
- a. any swear word;
  - b. language which has sexual connotations; and
  - c. racial, religious or other group descriptions.

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130. Avoid public criticism of staff or the QBA, its leadership and people.
131. Seek professional help if the use of alcohol, other mind altering or addictive substances or products (eg gambling) adversely affect your role.
132. If engaged in civil disobedience, do not act violently or intentionally provoke violence.
133. If acting in a personal role consider the appropriateness of making public comments, publishing private pages, etc. where you could be seen (even if incorrectly) to be a representative of, or representing the views of the QBA.
134. Dress appropriately and be sensitive to the effect that your attire may have on others.
135. Comply with copyright legislation. Ensure any licences for the use of copyright material are current and complied with, and copyright is duly acknowledged.
136. Exercise discretion when viewing or using restricted material:
  - a. consider the legitimate purpose of viewing or using the restricted material;
  - b. consider whether your conduct will damage your reputation; and
  - c. disclose the purpose and circumstances of your conduct to a supervisor or colleague, to avoid any misunderstanding.

## BOUNDARIES

137. Ensure you understand the requirements of your role, including hours to be worked and nature of your responsibilities and entitlements.
138. Be aware of policies, delegations, protocols and procedures related to your duties.
139. Recognise the limits of your skills and experience. Do not undertake service (such as relationship counselling) beyond your competence, or the role for which you have been engaged or trained. If in doubt seek advice from a supervisor. A person who requires specialised help should be referred to an appropriately qualified person or agency.
140. Where responsibilities overlap, be aware of the activities, function and style of other staff and volunteers. Consult with these colleagues and co-operate wherever possible.
141. Where your responsibility to one person may conflict with your responsibility to another, or with your own interests, seek advice from a supervisor. Consider transferring responsibility for either or both of these to another.

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142. Workplace relationships can legitimately develop into romantic or sexual relationships. If this begins to happen:
- a. acknowledge to yourself that your personal interest and the workplace relationship are at risk of becoming confused;
  - b. declare the nature of the relationship to a supervisor to ensure accountability and prevent misunderstanding, working with the supervisor to develop an appropriate management plan.
143. A romantic or sexual relationship with a child is inappropriate, regardless of their age. This includes relationships with children formerly under your care up to, at least, two years following their ceasing to be under your care with the QBA.
144. If you are providing ongoing individual counselling as part of your role in the QBA, engage someone to provide regular professional supervision. This will help protect you and those to whom you counsel.

### COMMUNICATION

145. Any communication in your role as a staff member or volunteer, whether formal or informal, is an encounter where you are representing the QBA. Communication may be face-to-face, in writing or involve some form of technology. Consider the appropriateness and impact of your words and actions.
146. Innuendoes or compliments of a sexual nature are always inappropriate. When a person asks questions or seeks advice around topics of a sexual nature, be aware that they may have motives or needs you do not understand. Be realistic about your ability to assist them.
147. To minimise the risk of being accused of or engaging in misconduct, particularly when meeting with people, think carefully in advance about:
- a. the place of the meeting, the arrangement of furniture and lighting, and your attire;
  - b. whether the physical location allows for privacy of conversation while maintaining the opportunity for supervision. For example, doors to interview rooms, if closed, should not be locked;
  - c. the physical distance between you and the other person, so as to maintain both hospitality and respect;
  - d. whether the circumstances would suggest a social interaction;
  - e. the propriety and circumstances of the interview when you are visiting (or being visited) alone, especially at night;
  - f. the personal safety and comfort of all participants;
  - g. establishing at the outset, the interview's purpose and the boundaries with respect to the subject matter, confidentiality and its duration;
  - h. the appropriateness of initiating or receiving any physical contact, such as gestures of comfort, that may be unwanted or misinterpreted.

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148. When considering using technology for communication, apply the same principles you would in any other form of communication. Minimise the risk of harming others or yourself by asking:
- Is this an appropriate way to communicate about this matter?
  - should this communication be confidential?
  - how does the language and images used impact upon the person receiving the communication and any other person who may access it? could the circumstances of the communication, including the language and images used, suggest your relationship with the other person(s) is inappropriate?
149. Be aware of the risks associated with using technology in communication. Remember information posted online can be retrieved. Dangers associated with the use of communication technology are not always appreciated. These dangers include:
- losing control of information (such as photographs or emails);
  - ignoring personal security settings on social networking sites;
  - being unable to determine if people are who they say they are;
  - being exposed to unwanted information; and
  - becoming a victim of cyberbullying when someone sends or spreads threatening or embarrassing information

## VISITOR AND SPECTATOR POLICIES

- It is not uncommon for bridge-playing parents, grandparents or family friends of the child to come to and remain at QBA activities. You should ensure they sign the attendance record for the activity. The history and personal circumstances of such persons may not be known to you. While being friendly towards such persons, be mindful of your duties and responsibilities in allowing such persons to be at the QBA activity. Do not allow them unsupervised access to any child (except in the case of the person who brought them to the QBA activity).
- Such persons are required to act in a lawful and considerate manner, and obey the reasonable instructions of the organiser of the QBA activity. If they breach behavioural standards (eg if they are abusive or unruly), they should be asked to leave. If necessary, call the police.

## CONFIDENTIALITY

- Where possible, inform the person who may give you confidential information, of the limits to confidentiality and the arrangements for supervision or obtaining advice. Do so before the disclosure of the confidential information, such as at the beginning of an interview.
- Be aware of and, when appropriate, seek advice in respect to:
  - your legal obligations with regard to confidential information received, particularly in relation to criminal offences or child abuse;
  - the consequences of breaching confidentiality; and
  - the risk of physical, financial or emotional harm or hardship to another person by disclosing or not disclosing such information.

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5. Exercise special care that any illustrative material you use from personal experience (eg photographs) does not involve a breach of confidentiality.

### RECORD-KEEPING AND PRIVACY

6. If engaged in any individual counselling or supervision, consider keeping a factual record of your activity. Record details such as the date, time, place, participants, subject and any proposed action arising from each activity. Record personal remarks accurately.
7. Know the relevant principles of the applicable privacy legislation in relation to the collection, use, disclosure and management of personal information. These have implications for:
  - a. the publication of personal information in QBA materials and websites;
  - b. the recording and publication of voices and images of individuals; and
  - c. the use and security of all personal information, especially sensitive information, held by staff or volunteers on QBA or bridge club premises.
8. Secure confidential information safely (eg locked cabinets, or electronic files with password protection)
9. Confidential information should only be accessed by authorised persons.
10. Records should be kept (in either physical or electronic form) for at least the minimum period required by law or the period required by the QBA (whichever is longer).
11. If any information or comment is to be given to the media, carefully consider the impact this may have on QBA's reputation, and if the information or comment should be reviewed or approved by a supervisor before being given.

### FINANCIAL MANAGEMENT PRACTICES

12. Ensure the accounts of any QBA operations for which you have responsibility are in accordance with taxation and accounting requirements of both the QBA and the civil authorities.
13. If you have appropriate authority for financial management with the QBA, minimise the risk of you and other staff or volunteers being accused of, or engaging in, financial impropriety by ensuring:
  - a. Where more than \$200 is received, two persons, unrelated by family, handle money received;
  - b. that QBA money on QBA premises is kept safely and securely;

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- c. QBA money being taken home is avoided (unless that is an appropriate place to be taken home);
- d. all QBA money received is banked promptly;
- e. proper accounting records are kept for QBA transactions, in the form of receipts, diary entries, tax invoices, accounts and account statements;
- f. all QBA accounts have more than one signatory (except for any petty cash type account involving only minimum funds);
- g. any accounts paid by cash are duly receipted; and
- h. those with the responsibility for handling money have suitable training in financial matters

## GIFTS

14. If you are offered or receive a gift, whether monetary or otherwise, from a person with whom you have a relationship as a result of your role:
- a. establish for whom the gift is intended and exercise discretion as to whether the gift should be personally accepted;
  - b. Consider:
    - c. the size of the gift;
    - d. the intentions and circumstances of the giver;
    - e. the risk of your integrity being compromised; and
    - f. whether acceptance of the gift would be considered inappropriate, if known publicly;
  - g. If it is substantial, disclose the offer or receipt to a supervisor or colleague; and
  - h. If there is any uncertainty as to the gift's appropriateness, seek advice from a supervisor.

## PERSONAL FINANCIAL OBLIGATIONS

15. Avoid borrowing money from, or lending money to, a person with whom you have a relationship as a result of your role, as this may place you in a position where your personal interest conflicts with your QBA responsibilities. If you do, then disclose the circumstances to a supervisor.

## ORGANISATIONAL BEHAVIOUR AND CULTURAL INCLUSIVENESS

16. The QBA promotes a culture of inclusivity and is committed to meet its obligations under the Human Rights Act 2019. You must not breach its provisions, including but not limited to, breaches with regards to rights under the Act as to
- a. Freedom of thought, conscience, religion and belief
  - b. Freedom of expression
  - c. Privacy and reputation
  - d. Protection of family and children
  - e. Cultural rights, both generally and more specifically in respect to the culture of Aboriginal and Torres Strait Islander people.

## **F. KEY TERMS**

### **ABUSE, INCLUDING CHILD ABUSE**

Abuse includes bullying, emotional abuse, harassment, neglect, physical abuse, or sexual abuse.

#### **CHARACTERISTICS AND EFFECTS OF CHILD ABUSE**

The signs and symptoms can include, but are not limited to:

- emotional abuse - low self-esteem, apathy, high levels of anxiety and fear, an over readiness to relate to anyone, excessive deference to a leader, unduly aggressive behaviour, withdrawn behaviour; isolation from former friends and family members
- physical abuse - bruises, bites, burns and scalds, fractures;
- sexual abuse - a level of sexual knowledge or desire for either contact or distance inappropriate to the child's age, self-harm, social isolation, a sudden onset of behavioural changes;
- neglect - failure of a child to grow within the normally accepted pattern, failure of a parent or guardian to provide adequate food, clothing, shelter, medical care and supervision;
- bullying or harassment - low self-esteem, loss of trust in others, apathy, an over readiness to relate to anyone, unduly aggressive behaviour, withdrawn behaviour.

The abuse of a child commonly causes psychological and emotional harm and is likely to lead to the impairment of their social, emotional, cognitive, and intellectual development and/or disturbed behaviour.

The effects of child abuse extend well beyond the abuser and their primary victims.

The families of the victim and abusers, as well as their communities, can also experience a high degree of distress when revelations of abuse emerge.

Often, they can deny the disclosure and reject the victim rather than face reality.

Once the reality is confronted, the community will commonly experience profound shock, guilt about failing to protect the primary victim, deep hurt and disillusionment.

#### **IMPACT OF ABUSE**

A person who is abused may suffer emotionally, psychologically, physically, and socially. The impact can be life long and affect the person, their relationships and their capacity.

The person who is abused may experience, for example:

- feelings of shame, humiliation, rejection, powerlessness, insecurity, anger and resentment;
- sadness, tearfulness, depression, anxiety;
- fatigue, disturbed sleep, changed appetite and ill health;
- substance abuse, gambling and use of pornography;
- becoming more withdrawn or aggressive;
- burn out;
- suicidal thinking and action;
- loss of self-esteem and self-confidence;
- marital and family problems;

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- breakdown in community and collegial relationships;
- loss of coping skills;
- disillusionment;
- inability to concentrate;
- loss of motivation;
- decreased productivity and competence;
- bad decision-making and poor judgement;
- loss of faith or crisis of vocation;
- difficulty trusting others;
- diminished employability;
- premature desire to cease employment

## BULLYING

Bullying means behaviour directed to a person or persons which:

- is repeated;
- is unreasonable (being behaviour a reasonable person, having considered the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening); and
- creates a risk to their health and safety.

Bullying can include:

- making derogatory, demeaning or belittling comments or jokes about someone's appearance, lifestyle, background or capability;
- communicating in an abusive manner;
- spreading rumours or innuendo about someone, or undermining in other ways, their performance or reputation;
- dismissing or minimising someone's legitimate concerns or needs;
- inappropriate ignoring or excluding someone from information or activities;
- touching someone threateningly or inappropriately;
- invading someone's personal space or interfering with their personal property;
- teasing someone, or playing pranks or practical jokes on someone; or
- displaying or distributing written or visual material that degrades or offends.

Behaviour does not include lawful conduct of staff and volunteers carried out in a reasonable manner, such as:

- disagreeing with or criticising someone's belief or opinions or actions in an honest and respectful way;
- giving information about inappropriate behaviour, in an objective manner, to the person or persons concerned and to any other person with a proper reason for having that information;
- setting reasonable performance goals, standards or deadlines;
- giving information about unsatisfactory performance in an honest and constructive way; or
- taking legitimate disciplinary action.

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**CYBERBULLYING** is a form of bullying which involves the use of information and communication technologies.

### EMOTIONAL ABUSE

Emotional abuse means acts or omissions that have caused, or could cause emotional harm or lead to serious behavioural or cognitive disorders. It includes:

- subjecting a person to excessive and repeated personal criticism;
- ridiculing a person, including the use of insulting or derogatory terms to refer to them;
- threatening or intimidating a person;
- ignoring a person openly and pointedly; or
- behaving in a hostile manner or in any way that could reasonably result in another person feeling isolated or rejected.

### HARASSMENT

Harassment means unwelcome conduct, whether intended or not, in relation to another person, where they feel, with good reason in all the circumstances, offended, belittled or threatened. Such behaviour may consist of a single incident or several incidents over a period of time. It includes:

- making unwelcome physical contact with a person;
- making gestures or using language that could reasonably give offence including continual and unwarranted shouting;
- making unjustified or unnecessary comments about a person's capacities or attributes;
- putting on open display, pictures, posters, graffiti or written materials that could reasonably give offence;
- making unwelcome communication with a person in any form (for example, phone calls, email, text messages); or
- stalking a person.

### NEGLECT

Neglect means the failure to provide the basic necessities of life where a child's health and development are placed at risk of harm. It includes being deprived of:

- food;
- clothing;
- shelter;
- hygiene;
- education;
- supervision and safety;
- attachment to and affection from adults; or
- medical care.

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### PHYSICAL ABUSE

Physical abuse means any intentional or reckless act, use of force or threat to use force, causing injury to, or involving unwelcome physical contact with another person. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. An injury may take the form of bruises, cuts, burns or fractures. It does not include lawful discipline by a parent or guardian.

### SEXUAL ABUSE OF AN ADULT

Sexual abuse of an adult means sexual assault, sexual exploitation or sexual harassment of an adult.

**SEXUAL ASSAULT** means any intentional or reckless act, use of force or threat to use force, involving some form of sexual activity against an adult without their consent.

It includes:

- sexually touching and fondling or attempting to sexually touch or fondle a person without their consent;
- kissing or attempting to kiss another person without their consent;
- holding or attempting to hold another person in a sexual manner without their consent;
- forcing or attempting to force a person to sexually touch or fondle another person;

**SEXUAL EXPLOITATION** refers to any form of sexual contact or invitation to sexual contact with an adult, with whom there is positional power, eg supervisory relationship, whether or not there is consent and regardless of who initiated the contact or invitation. This is not applicable where a declared relationship exists (where the relationship has been declared to a supervisor and an appropriate management plan has been put in place).

**SEXUAL HARASSMENT** means:

- an unwelcome sexual advance, or an unwelcome request for sexual favours, to the other person, or
  - other unwelcome conduct of a sexual nature in relation to the other person; in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated that the other person would be offended, humiliated or intimidated.
- Such behaviour may consist of a single incident or several incidents over a period of time. It includes:
- asking a person for sex;
  - giving a person to understand that you would like sexual favours from them;
  - making any gesture, action or comment of a sexual nature to a person directly or making a comment of a sexual nature about them in their presence;
  - making jokes containing sexual references or innuendo using any form of communication;
  - exposing a person to any form of sexually explicit or suggestive material;
  - making unwelcome physical contact such as touching, pinching or patting;

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- making unwelcome or unnecessary inquiries about, or attempts to discuss, personal matters of a sexual nature;  
deliberately intruding on an individual's personal space;
- staring at or secretly watching a person for the purpose of sexual stimulation or gratification; or
- stalking a person.

### SEXUAL ABUSE OF A CHILD

Sexual abuse of a child means the use of a child by another person for his or her own sexual stimulation or gratification or for that of others. It includes, but is not limited to:

- making sexual advances to a child using any form of communication;
- exposing oneself indecently to a child;
- kissing, touching, holding or fondling or attempting to kiss, touch, hold or fondle a child in a sexual manner;
- staring at or secretly watching a child for the purpose of sexual stimulation or gratification;
- making any gesture or action of a sexual nature in a child's presence;
- making sexual references or innuendo in a child's presence using any form of communication;
- discussing or inquiring about personal matters of a sexual nature with a child;
- possessing, creating or exposing children to child exploitation material of a sexual nature;
- exposing a child to any form of sexually explicit or suggestive material including clothing with sexually explicit images or messages;
- giving goods, money, attention or affection in exchange for sexual activities with a child;
- giving goods, money, attention or affection in exchange for images of a child for the purpose of sexual gratification of themselves or others; or
- encouraging, forcing, or attempting to encourage or force a child:
  - to sexually touch or fondle another person; or
  - to engage in or watch any other sexual activity.

Sexual abuse of a child does not include age-appropriate consensual sexual behaviour between peers (i.e. the same or a similar age)

Sexual abuse of a child commonly has the following characteristics:

- it usually starts with something minor and gradually builds up to more involved behaviours through a process of grooming;
- it is secretive and generally known only to the abuser and victim, making it extremely difficult to detect;
- it is perpetrated by someone known to the child and/or held in a position of trust by the child or their parents or guardians; and
- it is rarely a self-contained or one-off incident but rather part of an ongoing relationship that is corrupting and distorting.

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### GROOMING

Grooming refers to actions deliberately undertaken with the aim of engaging and influencing an adult or a child for the purpose of sexual activity.

In the case of sexual abuse of a child, an offender may groom not only the child, but also those close to the child, including the child's parents or guardians and other family members. Grooming can include providing gifts or favours to the child or their family.

In the case of sexual abuse of an adult, an offender may groom not only the adult, but also those close to them, including their children.

Sexual abuse of a child is often preceded by grooming. Grooming actions are designed to establish an emotional connection to lower the child's inhibitions, through the development of a relationship with the child and increased opportunity to see the child. Grooming involves psychological manipulation that is usually very subtle, drawn out, calculated, controlling and premeditated. Typically, grooming occurs incrementally: accessing the victim, initiating and maintaining the abuse, and concealing the abuse.

Queensland law has grooming offences may target online or other electronic communications, subjecting children to child exploitation material, and/or using intoxicating substances to engage children for the purpose of sexual activity

### CHARACTERISTICS OF SEXUAL OFFENDERS

Sexual offenders generally:

- do not stop unless there is some intervening factor;
- believe or assert that the victim is complicit or a willing participant;
- attempt to deny, justify, minimise or excuse their behaviour by:
  - claiming their behaviour was an expression of love for the victim;
  - claiming their behaviour was a result of their childhood abuse;
  - claiming their behaviour was influenced by stress, the use of alcohol or other substances; and
  - blaming the victim;
- enjoy the activity, despite claims to the contrary; and
- are repeat offenders.

Sexual offenders who target vulnerable adults and children will often undertake a grooming process as a precursor to abusive behaviour.

### APPROPRIATE AUTHORITY

Appropriate authority with the QBA refers to:

- The QBA Manager
- The QBA President
- The QBA Vice-President
- The members of the QBA Management Committee

Such persons may delegate specific functions to other QBA staff or QBA volunteers.

## SECTION 2 – CODE OF CONDUCT

### **APPROPRIATE AUTHORITY FOR FINANCIAL MANAGEMENT**

A person with appropriate authority for financial management with the QBA. This means the QBA Manager and the QBA Treasurer. Such persons may delegate specific functions to other QBA staff or QBA volunteers.

### **APPROPRIATE SUPPORTS**

Appropriate supports may include:

- support within the child's family, such as parents, guardians, other adult family members and older siblings; or
- support within the QBA, such as the QBA Manager, members of the QBA Management Committee, the QBA Youth Coordinator, the QBA Youth Administration officer or other adults or older young people who have a relationship with the child and have the skill to sufficiently support the child, for example a bridge playing mentor; or
- supports within the community, such as Kids Helpline, Headspace or similar, counsellors or psychologists.

### **CHILD OR CHILDREN**

A child means an individual under the age of 18 years, and “children” has a corresponding meaning.

QBA youth bridge activities, including the work of the QBA Youth Coordinator and QBA Youth Administration Officer, are directed to, and conducted for, “youths”. The Australian Bridge Federation and the QBA include in their definition of youths not only children (persons under 18 years), but also adults who are 25 or under at the end of the current calendar year. The QBA Child Safe Strategy is designed specifically to create safe and supportive service environments for children, although indirectly it will help create safe and supportive service environments for all adults, including adults who are 25 or under at the end of the current calendar year.

### **CHILD EXPLOITATION MATERIAL**

Child exploitation material means material that describes or depicts a person who is or who appears to be a child:

- engaged in a sexual activity;
- in a sexual context; or
- as the subject of torture, cruelty or abuse (whether or not in a sexual context); in a way that a reasonable person would regard as being, in all the circumstances, offensive. Child exploitation material can include any film, printed matter including text, electronic data, computer image or any other depiction including drawing.

### **CHILD PORNOGRAPHY**

Child pornography means sexually explicit or suggestive material depicting children and is a form of child exploitation material.

### **CIVIL AUTHORITIES**

Civil authorities mean the police and the relevant Queensland government child protection authority.

## SECTION 2 – CODE OF CONDUCT

### **CONFLICT OF INTEREST**

A conflict of interest is a situation in which someone in a position of trust has competing professional or personal interests. A conflict may exist even if no unethical or improper acts result. A conflict can create an appearance of impropriety that can undermine confidence in the person or the QBA.

### **CORPORAL PUNISHMENT**

Corporal punishment means any punishment inflicted on the body.

### **INAPPROPRIATE BEHAVIOUR**

Inappropriate behaviour, as relevant to the QBA, is behaviour of a sexual, physical or psychological/emotional nature which exploits the special position of trust and authority between the staff member or volunteer and a child, as is unacceptable.

Such inappropriate behaviour may include, but is not limited to:

- inviting a child to the staff member or volunteer's home;
- sending or receiving correspondence of an inappropriate nature or inappropriate giving of gifts;
- physical or emotional aggression, violence or bullying;
- sexual exhibitionism or exposing a child to pornographic material in any medium;
- development of an intimate relationship;
- inappropriate discussion of sexual matters or use of obscene language, especially of a sexual nature;
- gestures, actions or jokes of a suggestive, obscene or sexual nature while in a child's presence;
- voyeurism (gaining pleasure from secret watching of another); or
- repeatedly seeking to be alone with a child.

### **INAPPROPRIATELY DISCRIMINATE**

Inappropriate discrimination occurs when a person takes adverse action against another because of a protected attribute. Protected attributes include: race, colour, sex, sexual orientation, age, physical or mental disability, marital status, family or carer's responsibilities, pregnancy, religion, political opinion, national extraction, or social origin.

Adverse action isn't always discrimination. There can be lawful reasons that have nothing to do with someone's personal characteristics. It is not discrimination if the actions:

- are allowed under state or federal anti-discrimination law;
- do not relate to one of the protected attributes; or
- relate to the necessary requirements of the job.

### **OFFENSIVE LANGUAGE**

Offensive language includes verbal harassment, racial and other forms of vilification, personal insult or comment and obscene words.

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### **PROHIBITED MATERIAL**

- Publications, films and computer games that have been classified by the Office of Film and Literature Classification as being unsuitable for a child to read, see or play;
- Any other images or sounds not subject to classification by the Office of Film and Literature Classification, that are considered, with good reason by the QBA, to be unsuitable for a child to see or hear; or
- Any substance or product whose supply to or use by children is prohibited by law; such as alcohol, tobacco products, illegal drugs and gambling products.

### **PROHIBITED SUBSTANCE**

Prohibited substance means any substance banned or prohibited by law for use or consumption

### **RESTRICTED MATERIAL**

- Publications, films and computer games that have been classified as Category 1 or 2 restricted, or X or RC classification, by the Office of Film and Literature Classification; and
- any other images or sounds not subject to classification by the Office of Film and Literature Classification (for example, internet material), that are considered, with good reason within the QBA, as being offensive on the grounds of violence, sex, language, drug abuse or nudity.

### **RISK MANAGEMENT PLANS**

Risk management plans are required for high risk activities and special events; these are also commonly referred to as risk assessments. Example issues for consideration in a risk management plan include:

- screening and selection of personnel;
- your role and capacity to perform it;
- use of external service providers;
- supervision;
- planning and conduct of activities;
- venue;
- health and safety;
- transport;
- disciplinary arrangements;
- physical contact;
- photographs and images; and
- record keeping

### **RISK MANAGEMENT STRATEGY**

In Queensland, the Working with Children (Risk Management and Screening) Act 2000 and Regulations 2020, requires the QBA to have a Risk Management Strategy that implements employment practices and procedures to promote the wellbeing of a child affected by the regulated employment or regulated businesses undertaken as part of QBA's activities, and to protect the child from harm. The Strategy must refer to the following:

## SECTION 2 – CODE OF CONDUCT

- a statement about commitment to the safety and wellbeing of children and the protection of children from harm;
- code of conduct for interacting with children;
- procedures for recruiting, selecting, training and managing persons engaged or proposed to be engaged by the QBA, as the procedures relate to the safety and wellbeing of children and the protection of children from harm;
- policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines;
- a plan for managing breaches of the risk management strategy;
- policies and procedures for compliance with the Act, chapter 8, including policies and procedures regarding -
  - implementing and reviewing the risk management strategy; and
  - keeping a written record of matters under the Act, chapter 8 about each person engaged by the QBA;
- risk management plans for high risk activities and special events;
- strategies for communication and support, including -
  - written information for parents and persons engaged by the QBA that includes details of the risk management strategy or where the strategy can be accessed; and
  - training materials for persons engaged by the QBA to -
    - help identify risks of harm and how to handle disclosures or suspicions of harm; and
    - outline the risk management strategy.

### **SERVICE**

The action of helping or doing work for someone.

### **STAFF**

A staff member is a person who is employed or engaged for financial reward by the QBA for the performance of work. This includes employees (permanent [full time or part-time], temporary, and casual) of the QBA, Contractors, and consultants. To the extent that persons such as the Youth Administration officer, QBA teacher, QBA Masterpoints secretary and similar positions receive some form of stipend, they fall within the definition of a staff member.

### **SUPERVISOR**

A supervisor is a person who supervises a person or an activity.

### **VOLUNTEER**

A person who has an agreement with the QBA to carry out work (or is undertaking work for the QBA by holding a position or performing a function with the actual or apparent authority of the QBA) where the work is carried out voluntarily (that is to say without financial reward, other than perhaps the reimbursement of out-of-pocket expenses). This includes, but is not limited to, members of the QBA Management Committee, members of the QBA Council, and the Youth Coordinator.

### 3. Recruitment, Selection, Management and Training of Staff and Volunteers

This part of the Child Safe Policy applies to both QBA staff and volunteers (as defined in the Code of Conduct under the CSS) where the usual functions of the employment or engagement include, or are likely to include, providing services directed mainly towards children; or conducting activities mainly involving children.

Throughout the CSS and its constituent documents (including this one), “child” is an individual under the age of 18 years, and “children” has a corresponding meaning.

#### ***PRE-APPOINTMENT***

##### **Recruitment**

The goal of this process is to identify and recruit someone who has the skills and attributes to fulfil the role requirements. When developing a recruitment strategy, it is important to consider the following:

##### **Position descriptions**

Selecting the right people for the QBA will be easier if position descriptions are developed. Having clear position descriptions allows the skills and experience needed by our staff and volunteers to perform their duties and contribute to an environment which is safe and supportive for children and young people.

Generally, a position description starts with a brief statement about the QBA. This could include extracts from our statement of commitment. It then details what the tasks or duties are of the role. Finally, it will outline what skills and attributes a person needs to fulfil the role.

A position description (sometimes referred to as ‘job description’, or ‘duty statement’) should be developed for all positions and volunteer roles in the QBA where the person requires a Blue Card.

A position description can help to:

- establish an understanding of the role and expectations for staff and volunteers to provide a safe and supportive environment for children.
- become more aware of the tasks required for specific activities.
- develop ‘requirements of the position’ (sometimes referred to as selection criteria).
- identify training needs, and
- attract and retain staff and volunteers.

The QBA should review all position descriptions from time to time to assist with ongoing performance improvement.

##### ***Drafting tips***

- Analyse the position and outline the skills, experience and responsibilities required of the role including:
  - the nature and the environment of the service provided to children,
  - the responsibilities and level of supervision associated with the position, and
  - the experience and qualifications required of the position.
- Write down the types of tasks or activities the role requires over a month and a year.

### SECTION 3 – RECRUITING, SELECTING PERSONNEL

#### Selection criteria

You should frame selection criteria to assess commitment, understandings, attributes, attitudes and values required of the position, particularly as they relate to children. A good way to do this is to list the duties and tasks required of the job in one column and then in the next column list the skills and attributes which are required to achieve these tasks.

#### Sample selection criteria

You may wish to format your specific policies and procedures in a table, for example-

<i>Position description: Youth Administration Officer or Youth Coordinator</i>	
<i>Tasks and Duties</i>	<i>Skills and attributes</i>
<p>maintain a database of contact details of youths (children and young adults who are 25 years or less at the end of the current calendar year). In respect to those who regularly attend a bridge activity, this is to include the contact details of their parents or some other adult who can be contacted on behalf of the attendee. This database is to be in an online secure environment, with access limited to the Youth Administration Officer, the Youth Coordinator and the QBA Manager.</p> <p>maintain a database of bridge club contact details</p> <p>prepare documentation to hold Youth Bridge Fun Days (YBFD)</p> <p>send out such documentation to youths and bridge clubs</p> <p>organise such YBFDs, including providing for teachers, lunch arrangements, teaching materials, etc.</p> <p>attending and teaching at such YBFD's.</p> <p>provide on-line access to database details to authorised persons</p> <p>be the primary contact point for Friday night youth bridge sessions</p> <p>organise such Friday night youth bridge sessions, ensuring two adults will be present, arrangements for children to travel home are in order, someone is there to open up and lock up, etc.</p> <p>be one of the teachers at such Friday night youth bridge sessions</p> <p>preparing a youth bridge budget</p> <p>maintain a Youth Bridge Players Facebook page, and post material to that site with some frequency</p>	<p>sound organisational skills</p> <p>bridge playing skills of a competent nature</p> <p>at least a reasonable level of knowledge and experience in computer skills, including the ability to use word processing, spreadsheet and Google Forms software</p> <p>understand Facebook and other social media platforms</p> <p>keen desire to work with children including patience and enthusiasm</p> <p>values children's rights to feel safe and happy</p> <p>prior experience with working with children</p> <p>understanding of physical and emotional needs of children</p> <p>communication skills including rapport and trust</p> <p>building skills</p> <p>problem solving and conflict resolution skills</p> <p>ability to both work independently and as part of a very small team</p> <p>telephone communication skills</p>

## SECTION 3 – RECRUITING, SELECTING PERSONNEL

<p>[In respect to the Youth Administration Officer role] assist Youth Bridge Coordinator where required.</p> <p>In the case of either the Youth Coordinator or Youth Administration Officer, often be the Non-Playing Captain of the Youth Team in the Interstate Teams Championship</p> <p>encourage youths to attend the Australian Youth Championship (typically held in Canberra)</p> <p>encourage youths to attend other local and regional bridge sessions and competitions once in each calendar year, confirm you have read and understood the QBA's Child Safe Strategy with particular reference to the Code of Conduct. Offer any suggestions you think fit as to any potential changes to such strategy</p> <p>talking and interacting with youths</p> <p>communicating with parents and carers</p> <p>organising and conducting special events such as youth bridge competitions</p> <p>planning what activities will be undertaken</p> <p>report writing</p> <p>developing activities for youths to undertake</p> <p>liaising with other organisations</p> <p>providing a monthly report to the QBA Manager of activities and statistics of attendance</p>	
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### **Advertising the position**

A well thought out position description will assist you to advertise the position to attract suitable applicants. When advertising a position, you should be clear about the QBA's commitment to provide a safe and supportive service environment for children.

This will assist in attracting appropriate candidates that share these values.

Drafting tips for advertisements:

- include a clear statement about QBA's safe and supportive work practices. To the extent that may be relevant in the advertisement (rather than the actual selection process), include issues such as advising candidates if they are going to be subjected to a police check, Blue Card screening, referee checks, or identification verification, and that QBA will request that the candidate disclose any information relevant to their eligibility to engage in activities involving children.
- include clear, concise details about the QBA
- provide brief details about the position and working conditions and environment and culture, and
- name a contact person for more information.

### **Selection**

The selection stage allows the QBA to choose the most suitable candidate for the position. It provides an opportunity to select people who will promote and protect the rights, interests and wellbeing of children. When recruiting new staff or volunteers, assessment should be based on the position description developed for the role. The aim should be to recruit someone who has the skills and attributes to fulfil the role requirements, or someone who, with a little extra training, can acquire the skills.

There are a range of methods to help select the most suitable candidate for the QBA, including -

## SECTION 3 – RECRUITING, SELECTING PERSONNEL

### **Interview process**

An interview gives the opportunity to explore applicants' backgrounds, work history, skills and values, and evaluate their suitability to work with children. During the interview process, asking appropriate and informative questions can help to select the most appropriate person for the role. The responses provided by the applicant provide an opportunity to consider how well they will uphold QBA's values, including the QBA's statement of commitment. You should ask a number of questions that explore the candidate's capacity to contribute to QBA's safe and supportive environment.

Consider using a combination of question types, including:

- scenario-type questions that explore how an applicant might behave in employment-related situations
- open-ended questions that allow the applicant to provide detailed answers, and
- probing questions which ask applicants to elaborate on the answers that they have provided to previously asked questions.

As an organisation with a responsibility to provide a safe and supportive environment for children, the QBA has the right to question any inconsistencies in a person's work history.

### **Referee checks**

Checking referee reports can be a vital part of any selection process. Referee checks confirm the applicant's work experience and suitability for the position and verify information provided by an applicant in their application and during an interview.

It might be useful to develop a checklist including questions for referees. Useful questions for a referee include:

- Would you engage the person again?
- Have you directly supervised the applicant and directly observed their work with children?
- Do you have any concerns about the applicant working directly with children?
- Can you give an example of a time when you observed the applicant managing a child with challenging behaviours?

If an applicant has provided a written reference from a referee, confirm it is authentic by contacting the referee.

### **Decision to engage**

Document actual decision to hire - appropriate record keeping to reflect the selection criteria for interviewed candidates, their reference checks, and any other checks which are conducted to assess suitability for engaging the person.

## ***POST-APPOINTMENT***

### **Induction program**

An induction program which includes details of QBA's Child Safe Strategy will assist personnel to understand their role in providing a safe and supportive environment for children.

It is important to make sure that all employees and volunteers participate in any relevant QBA induction program.

An induction package may contain a range of information about the QBA and can help personnel understand:

- QBA's commitment to an environment that is safe and supportive for children;
- the standards of behaviour expected as detailed in the QBA Code of Conduct;
- QBA's safe and supportive policies and procedures, and strategies to minimise harm;
- procedures to follow when a disclosure of harm is received;
- reporting guidelines in relation to disclosures of harm and suspicions of harm;
- their own rights and responsibilities, as well as those of children;

### SECTION 3 – RECRUITING, SELECTING PERSONNEL

- what to expect if there is an allegation of harm made against them or to them;
- what constitutes a breach of QBA's Child Safe Strategy and the potential consequences;
- the roles of key people of QBA, and
- grievance procedures.

It is helpful to document the induction process and what has been covered with staff and volunteers. A checklist is often an easy way of recording this and ensuring all essential information is covered. Given the expected role of QBA personnel, the induction may primarily be providing a copy of the Child Safe Strategy (CSS), asking the person to read and acknowledge they have read it, and going through together some of the more common issues faced by the QBA and personnel. A template document to confirm this has been undertaken is

#### **Commitment by QBA staff or volunteer**

This statement is made by me, [insert name]

1. I confirm I have been provided with a copy of the QBA Child Safe Strategy (or viewed the document on the internet);
2. I have read and understood such documentation, and had the opportunity to ask questions about it.
3. I understand that I must report any criminal conviction or charge prior to and subsequent to my engagement that indicates that I may present a potential risk to children.
4. I understand my responsibilities in relation to promoting the safety of children;
5. I will observe my obligations as set out in the Child Safe Strategy during my engagement with the QBA to promote the safety of children participating in activities provided by the QBA

QBA staff or volunteer

Name:

Signature:

Date

#### ***Training***

An effective organisation requires that personnel receive ongoing training. New personnel need support and information when they begin their new role, and existing personnel might need to develop new skills and knowledge to meet the requirements of their positions and assist in their personal development.

It is essential that personnel provide a positive contribution to the service environment and commit to promoting the safety and wellbeing of children. Training should enhance the skills and knowledge of employees and volunteers, and reduce exposure to risks. Mechanisms to support this may include one or more of the following:

- undertaking an assessment of the specific risks and subsequent training needs which are relevant to your service environment
- clearly identifying mandatory training to all staff and specifying how frequently it should occur, for example, training in relation to your child safe strategy and reporting disclosures or suspicions of harm must occur with initial induction and then refresher training must be undertaken annually, and
- maintaining a register of who has completed what training.

## SECTION 3 – RECRUITING, SELECTING PERSONNEL

Personnel should receive training in the following areas

- identifying, assessing and minimising risks
- the QBA's policies and procedures (including the QBA's Code of Conduct)
- compulsory training (if any) as required by industry standards or legislation, and
- handling a disclosure or suspicion of harm, including reporting guidelines.

### **Monitoring training requirements**

Consider who will be responsible for making sure training procedures are followed and any training requirements are met. A training register helps you ensure that QBA personnel are appropriately trained and aware of the responsibilities of their roles. It also helps the QBA to keep effective records in relation to training requirements, potential areas for staff development and the regularity of training.

The nature and extent of training will vary with the role of the person concerned, the extent of his or her duties, their prior experience and training, the extent of their interaction with children, and other factors. At the present time, the training will consist of

- Informal: Ongoing monitoring and coaching, and
- Formal: An annual meeting with persons involved in child-related work at the QBA to review the child safe strategy

### **SAMPLE TRAINING REGISTER TEMPLATE**

Employee/Volunteer \_\_\_\_\_

Position \_\_\_\_\_

Date	Details of training
	Annual meeting to confirm the child safe strategy has been read, issues discussed, and consideration given as to what changes to the strategy may be desirable.

### ***Management***

It is the responsibility of the QBA Management Committee to ensure management procedures are in place to support and encourage safe and supportive environments for children. That responsibility may be delegated to the QBA Manager. The QBA seeks to ensure that our management processes are consistent, fair and supportive. In addition, it is useful to consider the following processes to effectively manage staff and volunteers:

- **Goal-setting.** Undertaking a goal-setting process with personnel can assist the QBA to encourage staff and volunteers to improve their performance in a positive manner. This should be a collaborative process for staff and volunteers to set targets and make a plan on how they will achieve them. To identify the goals, it is important to
  - refer to the duties and skills contained within the job description, and
  - take into account that the QBA is a small organisation, with many roles performed on a voluntary basis or paid at a non-commercial rate.

## SECTION 3 – RECRUITING, SELECTING PERSONNEL

- **Exit interviews or questionnaires.** The information gathered during an exit interview or questionnaire process may assist the QBA to identify broader issues of concern that may impact on the safety and wellbeing of children in QBA's service environment. An exit interview or questionnaire can provide an opportunity to:
  - gather information about the effectiveness of the recruitment process
  - identify possible areas for improvement in QBA's processes, management, job design, remuneration or career planning and development, and
  - receive positive feedback on what is working well in the QBA.
- **Support processes for staff and volunteers.** Staff and volunteers can often be affected by issues that happen at work or at home. If their concerns are not addressed effectively, QBA's ability to provide a safe and supportive environment for children may be affected. Therefore, it is extremely important to consider how the QBA will support its personnel when they are experiencing difficulties. Support processes can include mentoring, mediation, conflict resolution, coaching and additional training. They may also involve providing them with information on a range of external support and counselling services, combined with the offer of flexibility in working arrangements, if required and appropriate.

### **The rights and expectations of children, parents and carers**

To assist the QBA to provide the highest quality of care to children, it is important to continually promote and demonstrate respect for the rights and expectations of children, parents and carers.

The QBA's daily operations for children must reflect the active engagement and inclusive participation of children as described within our policies and procedures.

Parents and carers should be able not only to access the QBA's policies and procedures, but also to consider if the QBA is living up to the expectations within the policies and procedures, and that they are reflected in the daily operations within the service environment.

By the QBA Child Safe Strategy, the QBA seeks to have clearly documented policies and procedures in relation to:

- Reviews to consider if our personnel are not meeting expectations, and setting goals in relation to issues which impact on the safety and wellbeing of children,
- complaints management,
- disciplinary procedures (including in relation to criminal matters), and
- performance management, including processes for addressing issues related to performance which may impact on the safety or wellbeing of children.

## 4. Handling Disclosures or Suspicions of Harm, including reporting guidelines

The QBA recognises that children are vulnerable members of the community and that extra measures must be taken to protect and support them. Children can only be protected from harm if it is reported and dealt with quickly and effectively.

Therefore, the QBA has policies and procedures in place to ensure staff and volunteers respond as quickly as possible to a disclosure or suspicion of harm.

The following policy and procedures seek to ensure that staff, volunteers and other persons bound by the policy and procedures respond as quickly as reasonably possible and in the best interests of the child, when disclosures or suspicions of harm are received.

<p><b>Who does this policy and procedures apply to?</b></p>	<p>In the same circumstances as outlined in the QBA Code of Conduct (component 2 of the series of 8 components of the CSS). In general terms, this is not just QBA employees and volunteers, but everybody who is involved with the QBA including children, parents, contractors and all other people relevant to the QBA.</p>
<p><b>When does this policy and procedures apply?</b></p>	

All QBA staff and volunteers will receive training in identifying risks of harm and handling disclosures or suspicions of harm as soon as possible upon commencing their engagement by the QBA.

### **Defining harm**

**Harm**, to a child, is defined as ‘*any detrimental effect of a **significant nature** on the child’s physical, psychological or emotional wellbeing*’. Harm can be caused by physical, psychological, or emotional abuse or neglect, or sexual abuse or exploitation. Harm can be caused by (a) a single act, omission or circumstance; or (b) a series or combination of acts, omissions or circumstances. (section 9 of the *Child Protection Act 1999*).

**Harm** may be categorised in the following types:

- *physical abuse*, for example, beating, shaking, burning, biting, causing bruise or fractures by inappropriate discipline, giving children alcohol, drugs or inappropriate medication
- *emotional or psychological abuse*, for example, constant yelling, insults, swearing, criticism, bullying, not giving children positive support and encouragement
- *neglect* for example, not giving children sufficient food, clothing, enough sleep, hygiene, medical care, leaving children alone or children missing school, and

SECTION 4 – DISCLOSURES OR SUSPICIONS OF HARM

- *sexual abuse or exploitation*, for example, sexual jokes or touching, exposing children to sexual acts or pornography or having sexual intercourse with a child or young person under 16 years of age (even if the child appears to have consented).

**Identifying harm**

**Actions/behaviours by perpetrator**

<p><b>TYPES OF ABUSE</b> <i>Actions/behaviour by perpetrator</i></p>	<p><b>RESULTING HARM</b> <i>Impact experienced by the child</i></p>
<p><b>Physical abuse</b></p> <p><i>Hitting</i> <i>Shaking</i> <i>Burning/scalding</i> <i>Biting</i> <i>Causing bruise or fractures by excessive discipline</i> <i>Poisoning</i> <i>Giving children alcohol, illegal drugs or inappropriate medication</i> <i>Domestic and family violence</i></p> <p><b>Psychological or Emotional abuse</b></p> <p><i>Scapegoating</i> <i>Persistent rejection or hostility</i> <i>Constant yelling, insults or criticism</i> <i>Cultural affronts</i> <i>Teasing/bullying/cyberbullying</i> <i>Domestic and family violence</i></p> <p><b>Neglect</b></p> <p><i>Not giving a child sufficient food, housing, clothing, enough sleep, hygienic living conditions, health care and adequate supervision</i> <i>Leaving children unattended</i> <i>Children missing school</i></p> <p><b>Sexual abuse or exploitation</b></p> <p><i>Kissing or holding a child in a sexual manner</i> <i>Exposing a sexual body part to a child</i> <i>Exposing children to sexual acts or pornography</i> <i>Making obscene phone calls or remarks to a child</i> <i>Having sexual relations with a child or young person under 16 years of age</i></p>	<p><b>Physical</b> <b><i>Refers to the body</i></b></p> <p>Bruising Fractures Internal injuries Burns</p> <p><b>Psychological</b> <b><i>Refers to the mind and cognitive processes</i></b></p> <p>Learning and developmental delays Impaired self-image</p> <p><b>Emotional</b> <b><i>Refers to the ability to express emotions</i></b></p> <p>Depression Hypervigilance Poor self esteem Self-harm Fear/anxiety</p>

## SECTION 4 – DISCLOSURES OR SUSPICIONS OF HARM

This is not a complete list of the types of abuse and resulting harm that may be experienced by children and young people, however it is to be used as a predictive tool for potential signs of harm. Each child's experience is different and depends on a range of factors, including the child or young person's age, the nature of harm, how long the abuse has been occurring, their relationship to the abuser, and their support networks

### **Information about the signs to help identify if harm is occurring.**

Some general indicators of child abuse include:

- showing wariness and distrust of adults
- demanding or aggressive behaviour
- sleeping difficulties, often being tired and falling asleep
- low self-esteem
- difficulty relating to adults and peers
- abusing alcohol or drugs
- being seemingly accident prone
- having broken bones or unexplained bruising, burns or welts in different stages of healing
- being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable
- feeling suicidal or attempting suicide
- having difficulty concentrating
- being withdrawn or overly obedient
- being reluctant to go home
- creating stories, poems or artwork about abuse.

Some general indicators of neglect include:

- malnutrition, begging, stealing or hoarding food
- poor hygiene, matted hair, dirty skin or body odour
- unattended physical or medical problems
- comments from a child that no one is home to provide care
- being constantly tired
- frequent lateness or absence from school
- inappropriate clothing, especially inadequate clothing in winter
- frequent illness, infections or sores
- being left unsupervised for long periods

A **disclosure of harm** occurs when someone, including a child, tells you about harm that has happened or is likely to happen.

Disclosures of harm may start with:

- "I think I saw..."
- "Somebody told me that..."
- "Just think you should know..."
- "I'm not sure what I want you to do, but..."

## SECTION 4 – DISCLOSURES OR SUSPICIONS OF HARM

### What is a 'suspicion' of harm?

A **suspicion of harm** is when someone has a reasonable suspicion that a child has suffered, is suffering, or is at an unacceptable risk of suffering, significant harm. This includes circumstances which relate to an unborn child who may be in need of protection after he or she is born. A child who has been, or may be experiencing, abuse may show behavioural, emotional or physical signs of stress and abuse.

You can suspect harm if:

- a child tells you they have been harmed
- someone else, for example another child, a parent, or an employee, tells you that harm has occurred or is likely to occur
- a child tells you they know someone who has been harmed (it is possible that they may be referring to themselves)
- you are concerned at significant changes in the behaviour of a child, or the presence of new unexplained and suspicious injuries, or
- you see the harm happening.

Considerations when forming a reasonable suspicion about harm to a child include: .

- whether there are detrimental effects on the child's body or the psychological state or emotional state
  - that are evident to the person, or
  - that the person considers are likely to become evident in the future, and
- in relation to any detrimental effects mentioned above
  - their nature and severity, and
  - the likelihood that they will continue, and
  - the child's age (section 13C of the *Child Protection Act 1999*).

You have a duty of care to follow up any suspicions of harm or potential risk of harm to children in your care. You can do this by observing and recording the actions of children who might be at risk and reporting your concerns to the relevant authority.

### QBA Child Protection Officer (CPO)

The QBA has appointed a child protection officer [currently the QBA Manager] who can deal with child protection issues in the QBA, and act as a point of contact should someone wish to raise concerns.

The CPO is a person who the QBA considers is honest, mature, ethical and has enough experience to deal with difficult and sensitive issues if they arise. The QBA has defined the CPO's duties and ensures they are in a position to deliver them.

The CPO's duties include:

- reviewing and managing the QBA's policies and procedures for handling disclosures or suspicions of harm
- In respect to staff who are required to hold a Blue Card or an exemption
  - inducting and training them in handling disclosures or suspicions of harm, and
  - providing them with a copy of QBA's policies and procedures for handling disclosures or suspicions of harm
- offering assistance and support when a person in the QBA receives a disclosure of harm

## SECTION 4 – DISCLOSURES OR SUSPICIONS OF HARM

- organising external support to assist parties following a disclosure or suspicion of harm
- developing processes for any corrective issues that don't need to be reported to an outside authority, and
- dealing with the media.

The CPO officer is the QBA Manager. If the QBA Manager is not available or otherwise the person concerned considers that for any reason the QBA Manager is not appropriate to act, the QBA President can be approached.

### **A. *Receiving and recording a disclosure or suspicion of harm***

This note documents how the QBA staff and volunteers should receive a disclosure of harm from a child or manage a disclosure or suspicion of harm. You should:

- remain calm and listen attentively, actively and non-judgmentally
- ensure there is a private place to talk
- encourage the person to talk in their own words and ensure just enough open-ended questions are asked to act protectively (eg 'Can you tell me what happened'...or 'Can you tell me more about that'). Don't ask leading questions which tend to suggest an answer. Ensure the person is advised that the disclosure cannot remain a secret and it is necessary to tell someone in order to get help
- reassure the person they have done the right thing by telling you
- advise the child that you need to tell someone else who can help the child
- document the disclosure clearly and accurately, including a detailed description of:
  - the relevant dates, times, locations and who was present
  - exactly what the person disclosing said, using "I said," "they said," statements
  - the questions you asked
  - any comments you made, and
  - your actions following the disclosure
- do not attempt to investigate the matter, or mediate an outcome yourself, and
- follow any relevant process for reporting a disclosure of harm and consider whether there are requirements to report matters to the Queensland Police Service or Child Safety.

#### *Suspicion of harm (or other concern for a child's welfare)*

In relation to a 'suspicion' of harm, you should:

- remain alert to any warning signs or indicators
- pay close attention to changes in the child's behaviour, ideas, feelings and the words they use
- make written notes of observations in a non-judgemental and accurate manner
- assure a child that they can come to talk when they need to, and listen to them and believe them when they do, and
- follow any relevant process for reporting a suspicion of harm and consider whether there are requirements to report matters to the Queensland Police Service or Child Safety, or consider what support services could be offered to the family if the concern does not meet the relevant threshold to make a report.

SECTION 4 – DISCLOSURES OR SUSPICIONS OF HARM

A template to assist you in recording a disclosure or suspicion of harm is

<b>Queensland Bridge Association Inc</b>	
<b>CHILD SAFE STRATEGY INCIDENT REPORT FORM</b>	
<b>Confidential:</b> This is a highly sensitive document. It must be prepared, used, distributed and stored in a secure environment in accordance with QBA policies and procedures.	
Names of the person/s who conduct is under consideration:	
Name and age of the person/s said to be detrimentally affected by the conduct:	
Name of the person/s reporting this incident	
Date of incident	
Time incident occurred	
Location where incident occurred:	
Witnesses (if any)	Name: Contact details
Description of incident (as reported)	
Are there any enclosures to this document?	
Immediate action taken (if no immediate action, comment on the appropriateness of this)	

## SECTION 4 – DISCLOSURES OR SUSPICIONS OF HARM

Name of person completing form:	
Contact telephone number of person completing form	
Date form completed: Time form completed:	
This incident report provided to (name of person)	
This incident report provided to (organisation of such person)	

### Contact Details of Some Relevant Authorities

QBA Child Protection Contact Officer	Kim Ellaway	3351 8602 or 0412 064 903 manager@qldbridge.com.au
Police	Urgent Cases	000
Police	Police District Communication Centre	<a href="https://www.police.qld.gov.au/forms/contact.asp#districtComms">https://www.police.qld.gov.au/forms/contact.asp#districtComms</a>
Child Safety Services	Regional Intake Service	<a href="http://www.communities.qld.gov.au/child-safety/about-us/contact-us/child-safety-service-centres/regional-intake-services">http://www.communities.qld.gov.au/child-safety/about-us/contact-us/child-safety-service-centres/regional-intake-services</a>

### **B. Reporting a disclosure or suspicion of harm**

The QBA seeks to document clear policies in relation to reporting a disclosure or suspicion of harm. These policies should outline the timeframes and relevant processes for reporting a disclosure or suspicion of harm.

Reporting of a disclosure or suspicion of harm involves a 3-step-process, namely:

#### **1. Considering whether the disclosure or suspicion needs to be reported to the Queensland Police Service**

If an individual believes a child is in immediate danger or in a life-threatening situation, they should immediately contact the Queensland Police Service by dialling 000.

Furthermore, a report should be made to the Queensland Police Service where you reasonably believe a child is, or is likely to become, at imminent risk of harm, or the victim of a criminal offence.

Queensland Police Service has a number of child protection and investigation units across Queensland. To contact the Queensland Police Service, individuals should

SECTION 4 – DISCLOSURES OR SUSPICIONS OF HARM  
contact their nearest Police District Communication Centre  
(<https://www.police.qld.gov.au/forms/contact.asp#districtComms>)

## **2. Considering whether the disclosure or reasonable suspicion of harm needs to be reported to Child Safety Services**

### ***Mandatory reporting (if applicable)***

There are some persons (eg doctors, registered nurses, approved teachers employed at a school and police officers with child protection responsibilities) who have mandatory reporting obligations. These individuals **MUST** report to Child Safety Services a reasonable suspicion that a child has suffered, is suffering, or is at unacceptable risk of suffering significant harm caused by physical or sexual abuse AND does not have a parent able and willing to protect the child from the harm.

### ***Non-mandatory reporting***

Although it is likely that the QBA, its staff and volunteers do not have mandatory reporting obligations, child protection is everybody's responsibility and every person SHOULD report to Child Safety if you form a reasonable suspicion that a child (including an unborn child) has suffered, is suffering, or is at unacceptable risk of suffering significant harm AND does not have a parent able and willing to protect the child from the harm.

#### *How to determine if there is significant harm*

Section 13C of the *Child Protection Act 1999* provides guidance when forming a reasonable suspicion about whether a child has suffered significant harm, is suffering significant harm, or is at an unacceptable risk of suffering significant harm. The matters that a person may consider include:

- whether there are detrimental effects on the child's body or the child's psychological or emotional state:
  - that are evident to the person, or
  - that the person considers are likely to become evident in the future, and
- in relation to any detrimental effects to the child the reporter may consider
  - their nature and severity, and
  - the likelihood that they will continue, and
  - the child's age.

The person's consideration may be informed by an observation of the child, other knowledge about the child or any other relevant knowledge, training or experience that the person may have.

#### *How to determine if there is a parent willing and able to protect the child*

A parent may be willing to protect a child, but not have capacity to do so and therefore they are not considered 'able'. This may include parents suffering from a severe mental health condition or physical illness/injury.

Alternatively, a parent may have the capacity to protect a child (i.e. they may be able), but may choose not to do so (i.e. they are not willing). This may include a parent continuing a relationship with a person who is sexually abusing their child.

In some circumstances, a parent may be both not able and not willing to protect the child from harm.

## SECTION 4 – DISCLOSURES OR SUSPICIONS OF HARM

In some cases, the circumstances in which the harm occurred will be so serious that it can be presumed there is no parent able or willing to protect the child.

If there is considered to be at least one parent both 'able' and 'willing' to protect the child, the child is considered to not be in 'need of protection'.

### *The information which must be provided to Child Safety*

Under section 13G(2) of the *Child Protection Act 1999*, the written report about a 'reportable suspicion' must contain the following details:

- the basis on which the person has formed the reportable suspicion, and
- the information prescribed by regulation, to the extent of the person's knowledge.

### ***Making a report to Child Safety***

This memo seeks to provide clear guidance about how a report should be made to Child Safety and the relevant contact details. If an individual working with the QBA needs to make a report to Child Safety Services, this can be done as follows:

- During normal business hours - contact the Regional Intake Service <http://www.communities.qld.gov.au/childsafety/about-us/contact-us/child-safety-service-centres/regional-intake-services>
- After hours and on weekends - contact the Child Safety After Hours Service Centre on 1800 177 135 or (07) 3235 9999. The service operates 24 hours a day, seven days a week.

If you are not sure who to call, or for assistance to locate their nearest Child Safety Service Centre, contact Child Safety Services' Enquiries Unit on 1800 811 810. Child Safety Service Centres have professionally trained child protection staff members who are skilled in dealing with information about harm or risk of harm to children.

A person making a report is protected from liability under the *Child Protection Act 1999* from civil or criminal legal actions and is not considered to have broken any code of conduct or ethics.

### **3. Consider whether referral is required to other support services, including Family and Child Connect**

If you have concerns for a child that do not amount to a reasonable suspicion of harm you can approach the QBA Child Protection Officer, who can consider what support services could be offered to the family. For example, a Family and Child Connect service can provide information and advice about connecting families with support services and the circumstances in which a referral can and should be made to one of these services.

Anyone can contact Family and Child Connect for information, advice and support for connecting families with support services. The Family and Child Connect website provides useful materials, including Training resources in relation to family support services, which can assist you further:

<https://www.qld.gov.au/community/caring-child/family-child-connect>

### ***Other important aspects of managing a report***

Guidelines to staff and volunteers:

- Persons with concerns should report matters of concern to the QBA Child Protection Officer in some written way (although this may be supplemented by oral communications), particularly where a disclosure is made concerning a person within the QBA. It would be expected that this be done as soon as reasonably possible, and in any event no later than 24 hours after you have identified the actual or potential risk to the child.

## SECTION 4 – DISCLOSURES OR SUSPICIONS OF HARM

- While it is important for the QBA to have designated people and reporting guidelines within the QBA, the person receiving the information is also able to report this to the relevant authorities and is encouraged to be involved in the reporting process. This is important as:
  - the integrity of the information is retained when the person receiving the disclosure is the person reporting the matter to the authorities
  - information is not accidentally mishandled in the internal reporting procedures, prior to the matter being reported to the authorities, and
  - where there is immediate risk of harm to a child, all staff or volunteers are aware they can act immediately to protect that child and contact the authorities.

Matters involving child protection are inherently sensitive. It is preferably that the person reporting the matter report directly to the CPO (rather than someone else in the QBA), and the CPO can determine if and how further persons within the QBA (or outside the QBA) should be involved. At all times, appropriate confidentiality is to be maintained in relation to the issues and any relevant documents.

- Appropriate support or counselling for the child and the person who receives the disclosure is available. This can be accessed by contacting the CPO. Support may include such matters as
  - Appointing internal support service officers or workplace health and safety officers.
  - Partnering with external support and counselling services.
  - Implementing mentoring programs using mentors which are either internal or external to the QBA.
  - Mediation or other alternative conflict resolution techniques.
  - Coaching.
  - Providing additional training.
- The CPO should carefully consider the desirability of obtaining clear guidance and advice from the Queensland Police Service or Child Safety as to:
  - who should tell the child's parents or carers about the disclosure and the action taken, and
  - who can give ongoing help and trained support to the child.

### **Step 3: Protect the child and manage the situation**

The CPO will assess the immediate risks to the child and (with the approval of the QBA President or QBA Management Committee, if necessary) take interim steps to ensure the child's safety and the safety of any other children. This may include redeploying the alleged offender to a position where there is no unsupervised contact with children, supervising the alleged offender or removing/suspending him or her until any investigations have been concluded. Seeking legal advice may be desirable.

The CPO will consider what services may be most appropriate to support the child and his or her parent/s.

The CPO will consider what support services may be appropriate for the alleged offender.

The CPO will seek to put in place measures to protect the child and the alleged offender from possible victimisation and gossip.

## SECTION 4 – DISCLOSURES OR SUSPICIONS OF HARM

### **Different investigatory actions**

- At least three different investigations could be undertaken to examine allegations that are made against a person to whom this policy applies, including:
  - A criminal investigation (conducted by the police)
  - A child protection investigation (conducted by the relevant child protection agency)
  - A disciplinary or misconduct inquiry/investigation (conducted by the QBA).
- In any QBA inquiry/investigation, the QBA will assess the allegations and determine what action should be taken in the circumstances. Depending on the situation, action may include considering whether the alleged offender should continue in his or her position, return to his or her position, be dismissed, banned or suspended or face other disciplinary action.
- Where required we will provide the relevant government agency with a report of any disciplinary action we take.

### ***Reviewing current policies and procedures***

You should undertake a review of the operation of QBA policies and procedures following a disclosure or suspicion of harm being actioned to:

- consider the application of the policies and whether there are any changes necessary, for example, whether they are suitable for:
  - responding to a child when a disclosure is made; and
  - protecting children from harm, and
  - assisting involved parties within the QBA, and
- identify any additional training requirements.

Your review must not interfere with court processes, and it may be a good idea to seek legal advice before starting a review. During the review, record what worked well and what may need to be improved upon. If you need to develop new policies and procedures, remember to provide information regarding the changes to QBA stakeholders.

### ***Media attention***

A disclosure or suspicion of harm may attract media notice. It is critical to avoid giving out protected or potentially damaging information. Consider limiting contact with the media to one person in the QBA. If that person is uncomfortable dealing with the media, consider referring them to the QBA solicitors or other external organisation.

## 5. Managing Breaches of the QBA Child Safe Strategy

### Purpose

This plan outlines the steps to be taken following a breach of the QBA Child Safe Strategy (CSS) in order to address the breach in a fair and supportive manner. A breach is any action or inaction by any person bound by the QBA’s CSS that fails to comply with any part of such CSS. Unless the context otherwise requires, the term “breach” includes a potential breach or alleged breach.

All stakeholders are to be made aware of the actions or inactions that form a breach as well as the potential outcomes of breaching the child safe strategy.

<p><b>Who does this policy and procedures apply to?</b></p>	<p>In the same circumstances as outlined in the QBA Code of Conduct (component 2 of the series of 8 components of the CSS). In general terms, this is not just QBA employees and volunteers, but everybody who is involved with the QBA including children, parents, contractors and all other people relevant to the QBA.</p>
<p><b>When does this policy and procedures apply?</b></p>	

### Processes to manage a breach of the Child Safe Strategy

Some breaches of CSS are such that they should be reported directly to an external agency.

Breaches handled by the QBA (either solely when there is no reporting to, or action by, an external agency, or when the QBA action is at the same time as, but independent of, any action by an external agency) will be managed in a fair, unbiased and supportive manner. The following will occur:

- all people concerned will be advised of the process
- all people concerned will be able to provide their version of events
- the details of the breach, including the versions of all parties and the outcome, will be recorded
- matters discussed in relation to the breach will be kept confidential, and
- an appropriate outcome will be decided.

A breach of CSS handled by the QBA can be for a number of reasons, and depending upon the breach involved, could involve informal or formal approaches.

After receiving notice of the breach, and based on the material made available to the QBA, the QBA Manager or CPO will decide whether:

- He or she is the most appropriate person to receive and handle the breach (if not, he or she may nominate another person to deal with the breach);
- To refer the matter to the police or other appropriate authority;
- The nature and seriousness of the breach requires a formal resolution procedure;
- To refer the breach to mediation;
- To appoint a person to investigate the breach;

## SECTION 5 – MANAGING BREACHES OF THIS POLICY

- To refer the breach to the QBA President or QBA Management Committee, which may take action as thought appropriate, which may include organising a disciplinary hearing;
- To implement any interim arrangements that will apply until the complaint process is completed. This may entail suspending a staff member or volunteer from any or all of their duties. Alternatively, the staff member or volunteer may elect, without any admission of wrongdoing, to voluntarily step down from all or any of his or her duties. If the complaint process is not completed within 6 months, the suspension (or voluntarily stepping down from duties) is cancelled. The staff member or volunteer has the option of appealing the suspension. Such appeal shall be by way of rehearing by, at the option of the staff member or volunteer, either the QBA Management Committee or the QBA Council.

In dealing with the breach, the QBA Manager or the CPO will take into account:

- Whether he or she has had any personal involvement in the circumstances and if so, whether it is appropriate someone else should handle the breach;
- The wishes of parties involved regarding how the breach should be handled;
- The relationship between the parties (eg an actual or perceived power imbalance between the parties);
- Whether the facts of the breach are in dispute; and
- The urgency of the breach, including the possibility that someone might face further unacceptable behaviour while the investigation process is underway.

If the QBA Manager or CPO is the appropriate person to handle the breach, he or she will, where appropriate and/or necessary:

- Provide the information received to the other person(s) involved and ask for a response;
- Decide if there is enough information to determine whether the matter alleged did or did not occur; and/or
- Determine what, if any, further action to take, including referring the matter for investigation or disciplinary action in accordance with this policy.

### *Investigating the breach*

In some cases, an investigation may be required to determine the facts surrounding the breach.

In this process:

- The Complainant and/or person wronged should be interviewed by the Investigator, and the complainant and any key information arising from the interview(s) documented in writing by the Investigator.
- The key details of the breach should be conveyed to the Respondent(s). The Respondent(s) must be given sufficient information to enable them to properly respond to the formal complaint.
- The Respondent(s) should be interviewed by the Investigator and given the opportunity to respond to the allegations. The Respondent's response to the breach should be documented in writing by the Investigator.
- If, in the process of the independent investigation, there continues to be a dispute regarding the facts, then statements from witnesses and other relevant evidence should be obtained (if possible) by the Investigator to assist in reaching conclusions and preparation of a report and recommendations.

## SECTION 5 – MANAGING BREACHES OF THIS POLICY

- The Investigator may make a finding, on the balance of probabilities, as to whether the breach, or each of the breaches (as appropriate) is:
  - substantiated (there is sufficient evidence to support the breach)
  - inconclusive (there is insufficient evidence either way)
  - unsubstantiated (there is sufficient evidence to show that the breach is unfounded or not enough evidence to substantiate the breach)
  - mischievous, vexatious or knowingly untrue.

If the investigator is not the QBA Manager or QBA CPO, following the investigation, a written report will be provided to the QBA Manager or CPO.

### **Suitable outcomes for breaches**

Any police or external authority action is conducted independently from the QBA, and questions about their actions should be made to them directly.

So far as the QBA's internal processes are concerned, the consequences of any breach (if established) will be based on the degree of seriousness, and will be proportionate to the breach. For instance, a breach of a code of conduct concerning inappropriate behaviour or language may result in disciplinary action, while a breach of failing to update blue card contact details may result in further training being provided.

Depending on the nature of the breach, outcomes may include one or more of:

- taking no action (if, for instance, the breach is unsubstantiated, mischievous, vexatious or knowingly untrue)
- emphasising the relevant component of the Child Safe Strategy, for example, the Code of Conduct
- providing closer supervision
- further education and training
- mediating between those involved in the incident (where appropriate)
- disciplinary procedures,
- reviewing current policies and procedures to determine
  - whether developing new policies and procedures are necessary
  - Any follow up actions should be taken if necessary
- referring the matter to the police or other external agency. If the breach is referred to the police or another external agency, the QBA will endeavour to provide all reasonable assistance required by the police or the agency.

### **Process for recording breaches, including outcomes.**

The QBA will record the breach, the steps taken to resolve it and the outcome. This information will be stored in a confidential and secure place.

## 6. Risk management plans for high-risk activities and special events.

Most bridge activities involving children occur at bridge clubs involving a few hours away from the person's home or are online games.

When a child is playing in any bridge competition which involves an overnight or longer stay, this involves a higher risk profile.

As a general rule, when playing in any bridge competition which involves an overnight or longer stay, children who are representing the QBA, or receiving a subsidy from the QBA, must be in the constant care of a parent or suitably qualified, parentally approved guardian. The QBA requires a "suitably qualified guardian" to be either a close adult relative or a person with a valid Queensland Working With Children Blue Card. The parent or guardian has the sole legal responsibility for the supervision and care of the child.

The QBA considers constant care would preclude the parent or guardian playing in the same or associated/parallel event if was a substantial possibility that children could be unsupervised at an unsuitable time; or for an extended period of time. For a child aged 14 or more: -

- after 6.00 pm would be considered an unsuitable time; and
- more than 2 hours an unsuitable period.

More stringent supervision requirements would be required for children under 14.

All expenses relating to the supervision of children are the responsibility of the players and their parents. The QBA's financial responsibility to these players is limited to the extent of the financial assistance offered to other members of the team or subsidy group.

In the absence of a parent or suitably qualified parentally-approved guardian, for the Interstate Teams Championship, the QBA, in its discretion, may offer to provide a free service to have the non-playing captain to act as chaperone to a child of at least 14 years, but this service will be more limited than that of a dedicated parent/guardian.

Many of the issues involved in playing in any bridge competition which involves an overnight or longer stay arise within the context of more common activities and/or are already covered by the Code of Conduct. You are referred to the provisions in the Code of Conduct relating to, among other matters: -

- Transportation
- Appropriate supervision of children
- Policies regarding photographs
- Managing medications and allergies
- Managing illness/injury
- Procedures applying to visitors
- Risks presented by the physical environment.

The person responsible for the group of children must ensure that; -

## SECTION 6 – RISK STRATEGY FOR SPECIAL EVENTS

- They have current contact details of both the child and their parents
- They have details of the transport arrangements the child is using to get to and from the city where the event is to take place.
- They have a copy of the signed Parent or Guardian Permission and Acknowledgement (for under 18's) form for each child.

It is desirable, but not compulsory, for someone in or associated with the group of children (whether that be the person responsible for the group of children or otherwise) to have recognised first aid training.

When events require children to sleep over, sleeping accommodation will segregate males and females (an exception can be made in the case of close family members), and it is desirable (but not required) to: -

- have parents or guardians involved in the events and supervision;
- have sleeping accommodation supervised by more than one adult of each gender.

Ideally the adult/s involved in charge of the group of children will not sleep in close personal proximity to a child, unless they are a parent or guardian of that child. In some cases, this may not be practical - eg at a Australian National Championship, the Youth team and its non-playing captain are accommodated in the same location. In such cases, the non-playing captain must not sleep in the same room as a single child unless they are a parent or guardian of that child or young person.

Travelling to other states or territories. When travelling to other states or territories, representatives of the QBA must comply with the legislative requirements of that particular state or territory. In certain jurisdictions, temporary, time limited exemptions from working with children checks may be available for interstate visitors with a Working with Children Check in their home state. The laws providing interstate exemptions are not consistent across Australia. If an employee or volunteer for the QBA is travelling interstate to do work that would normally require a working for children check, a check must be made to ascertain the relevant requirements of that state or territory.

When a child (representing the QBA or receiving a subsidy from the QBA) is playing in any bridge competition which involves an overnight or longer stay the parent or guardian of the child must complete and sign a "[Parent or Guardian Permission and Acknowledgement \(for under 18's\)](#)" form and provide it to the QBA at least 7 days before the event.

## 7. Compliance with the Queensland Blue Card System

The QBA complies with the Blue Card system in Queensland. We maintain a register of the Blue Card status of our staff and volunteers. We review, at least annually, our child risk management strategy.

The QBA keeps a spreadsheet (or equivalent in the government portal) which records all details of Blue Cards for employees and volunteers, and a copy of correspondence and ID verification for each person who has a Blue Card.

By ensuring that we comply with our legislative requirements under the Blue Card system, we demonstrate to our stakeholders we are committed to maintaining a safe and supportive environment for children.

### **Risk Management Requirements**

Our annual review of our child safe strategy considers:

- whether our policies and procedures were followed
- whether any incidents relating to the child safe issues occurred
- the actual process used to manage any incidents
- the effectiveness of the QBA's policies and procedures in preventing or minimising harm to children, and
- the content and frequency of training in relation to our child safe strategy.

The review is documented and any changes to our policies and procedures are communicated to relevant persons (either personally or by updating material on our website).

### **Blue Card Screening Requirements**

Our organisation specifically addresses:

#### **Identification of who requires a Blue Card or Exemption Card.**

It is important to recognise that Blue Card screening requirements do not apply to every environment where a child may be present. In the context of the QBA operations, the law requires any QBA employee or volunteer to have a Blue Card or exemption if (a) the usual functions of their engagement include, or are likely to include, providing services directed mainly towards children; or conducting activities mainly involving children, and (b) the person is engaged to work, and works, in their QBA engagement for 8 or more days in a calendar year.

While organisations (including the QBA) can encourage other persons to hold Blue Cards, it is not possible to make a compulsory requirement for employees or volunteers to hold a Blue Card unless they fall within the above provisions.

#### **Criminal History Screening Procedure.**

#### **Nomination of a Contact Person**

The designated contact person for QBA responsible for managing Blue Cards and exemption cards is the QBA Manager. Each Blue Card or Exemption Card application form for a paid employee or volunteer has a space in the "Organisation details" section for a "contact person". The contact person is the person who Blue Card Services will send all notifications to and is the only person who Blue Card Services can discuss the person's Blue Card status with unless additional authorisation is provided.

## SECTION 7 – BLUE CARD COMPLIANCE

### **Important things to remember**

- We notify all applicants that by signing the application form they are consenting to the screening process.
- We certify that the “contact person” or delegate has sighted documents to confirm an employee’s identity as prescribed under the Act.
- We carefully check through the application form to ensure all sections have been appropriately completed.
- We are aware that while paid employees can commence employment after an application form has been submitted, volunteers and trainee students must not commence regulated employment until they hold a valid Blue Card and positive notice.
- We explicitly warn potential staff (paid employees, volunteers and students) that it is an offence for a “disqualified person” to sign a Blue Card application form or a renewal form. **It is an offence for us not to provide this warning.**

### **Managing Existing Blue Card Holders**

- If a person joins our organisation and already has a Blue Card, we ensure that we verify the validity of the Blue Card. To check of the validity of the card of a prospective employee or volunteer, it is possible to do so on the [Blue Card Services website](#) provided that we have details of the employee’s name as it appears on the card, full card number (including the number following the ‘/’ on the card) and its expiry date.
- In addition, we lodge with Blue Card Services the following
  - If the person holds a paid Blue Card, we lodge a [Link an applicant/cardholder to this organisation form](#)
  - If the person holds a volunteer Blue Card and will be undertaking paid employment with our organisation we lodge a [Volunteer to paid transfer form](#)
  - If the person holds a volunteer Blue Card and will be undertaking voluntary employment with our organisation we lodge a [Link an applicant/cardholder to this organisation.](#)This will assist us to receive important notifications in relation to the Blue Card holder, including if a card has been cancelled or suspended.
- If a person ceases working with us we lodge an [Applicant/Cardholder no longer with organisation \(for organisations\) form](#) to advise Blue Card Services.
- We take such actions within the timeframes in the relevant legislation.

### **Managing Changes in Police Information**

We ensure that individuals understand their obligation to advise us if there is a change in their police information. Our employees/volunteers are not required to disclose the specific nature of the change, only that a change has occurred.

We have processes in place to ensure that a [Change in Police information Notification](#) is submitted to Blue Card Services if we receive notification that there is a change in the person's police information.

## SECTION 7 – BLUE CARD COMPLIANCE

### **Managing high-risk individuals**

We have relevant processes in place for managing notifications from Blue Card Services in relation to high-risk individuals, for example:

- an employee or volunteer receives a negative notice or is a known disqualified person, or
- an employee or volunteer has their Blue Card or Exemption Card cancelled or suspended, or
- an employee or volunteer has their Blue Card application withdrawn, or
- a notification in relation to a serious change in criminal history is received from Blue Card Services.

### **Employee and Volunteer Blue Card Register**

As part of our Child Safe Strategy, our organisation maintains an employee and volunteer Blue Card register which is a written record or register of all paid employees and volunteers involved in child-related activities within our organisation.

[Note, a [template](#) is available here.]

We have procedures for maintaining a register in either electronic or hard copy format.

If employees or volunteers join our organisation with a Blue Card, we confirm that the card is valid. We maintain a written record of all employees or volunteers within our organisation who are required by law to have a Blue Card or Exemption Card, which includes:

- whether or not the person requires a Blue Card/Exemption card (if not, why not -- eg an exemption applies under the Act);
- the type of application/Blue Card (eg paid or volunteer) or Exemption Card;
- when the person applied for and/or the date of issue of the positive notice and Blue/Exemption card;
- the Blue Card/Exemption Card number;
- and the expiry date of the Blue Card, and
- the renewal date.

## SECTION 7 – BLUE CARD COMPLIANCE

### Tips

- If volunteers apply at least 30 days before their Blue Card expires, it allows them to continue working in child-related engagement, even if their Blue Card expires before a new card is issued.
- Paid employees must submit a renewal application before the expiry date of their Blue Card to continue working in regulated child-related employment once their application has been lodged.

We ensure appropriate and confidential records in relation to the following are maintained:

- whether a negative notice has been issued
- any change in status to a Blue Card /Exemption Card (such as a change in police information, or the cancellation or suspension of a Blue Card/Exemption Card)
- where there is a change in police information, the date we informed Blue Card Services of the change
- where an employee or volunteer providing child-related services leaves our organisation and the date we informed Blue Card Services, and
- any change to the employee's/volunteer's personal information, including the date they informed Blue Card Services (note that it is an offence for an employee/volunteer to fail to notify Blue Card Services on the appropriate form of any change in personal details within 14 days)

## 8. Communication and Support

The QBA has the following strategies for communication of our risk management strategy and support:

- written information for parents, employees and volunteers that includes details of our organisation's risk management strategy or where the strategy can be accessed; and
- training materials for employees and volunteers which;
  - help identify risks of harm; and
  - how to handle disclosures or suspicions of harm; and
  - outline our organisation's risk management strategy.

Our child safe strategy will be most effective when it has been successfully communicated to all people involved with the QBA. We value a culture which recognises and values the importance of upholding safeguards for children.

### **Our strategy for communication and support seeks to: -**

- ensure that people in the QBA are aware of their responsibilities and understand what is acceptable behaviour for interacting with children;
- enable people to feel comfortable addressing issues of concern;
- highlight the importance of the QBA's commitment to protecting the safety and wellbeing of children in our service environment; and
- reduces the likelihood of breaches of our child safe strategy.

### **Our strategies to achieve this include:**

- we provide a copy of our CSS on our website;
- we advise affiliated bridge clubs of our CSS and encourage them to develop their own CSS (whether by adopting our CSS or otherwise);
- we comply with the CSS, which provides for a number of relevant procedures, for instance in respect to making people aware of their responsibilities and understand what is acceptable behaviour for interacting with children;
- if a child becomes a member of the ABF Youth club, when we write to them to advise them of that fact, we refer to our CSS;
- we require relevant staff and volunteers to have annual refreshers or re-reading of our CSS
- we provide relevant individuals with information to understand their obligations as a Blue Card holder. Information sheets are available on the Blue Card Services website;
- we provide training materials by, among other matters, providing [a link](#) in this document, to training material on the internet.
- we welcome input from all stakeholders (especially children and their parents) in the development and review of our CSS.
- in order to improve our policies over time, the QBA Manager and QBA President are readily contactable for any issues relating to our CSS. Any issues with our CSS will be dealt with professionally and with great priority.

## SECTION 8 – COMMUNICATION & SUPPORT

### **Support processes for staff, volunteers and others.**

Staff may require support to deal with issues such as behaviour management, stress, conflict, bullying (including cyberbullying), child protection concerns, breaches of the child safe strategy and dealing with disclosures or suspicions of harm. Staff and volunteers can often be affected by issues that happen at home.

If their concerns are not addressed effectively, QBA's ability to provide a safe and supportive environment for children may be affected. Therefore, the QBA considers what may be appropriate support for its staff and volunteers when they are experiencing difficulties. Support processes can include mentoring, mediation, conflict resolution, coaching and additional training. The QBA may also provide them with information on a range of external support and counselling services, combined with the offer of flexibility in working arrangements, if required and appropriate.

Other people involved in the QBA such as parents may also benefit from support to assist with managing concerns. We also consider what may be appropriate support for all people involved with the QBA.