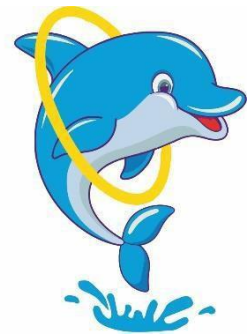


BLUE DOLPHIN

S W I M C E N T R E

...where kids love to swim!



Child Safe Environments Policy

Version: 2.4

Internal Approval Date: 20/09/23

Next Review Date: July 2025

Forward: National Principles for Child Safe Organisations

The Royal Commission into Institutional Responses to Child Sexual Abuse made recommendations about:

- what makes institutions safe for children
- improving child safe approaches

On July 1st, 2021, the National Principles for Child Safe Organisations replaced the former South Australian Principles of Good Practice.

Blue Dolphin Swim Centre has updated its Child Safe Environments policy v1, December 2019 to reflect the National Principles for Child Safe Organisations.

The National Principles for Child Safe Organisations are...

- 1) Child safety and wellbeing is embedded in organisational leadership, governance and culture.
- 2) Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
- 3) Families and communities are informed and involved in promoting child safety and wellbeing.
- 4) Equity is upheld and diverse needs respected in policy and practice.
- 5) People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
- 6) Processes to respond to complaints and concerns are child focused.
- 7) Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
- 8) Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
- 9) Implementation of the national child safe principles is regularly reviewed and improved.
- 10) Policies and procedures document how the organisation is safe for children and young people.

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1. Document Purpose

This document has been created to summarise the actions and activities undertaken at Blue Dolphin Swim Centre (BDSC) to create a 'Child Safe Environment', and to outline the roles and responsibilities for everyone involved in the organisation.

As defined by the Government of South Australia legislation and the National Principles for Child Safe Organisations, organisations providing child safe environments:

- take a preventative, proactive and participatory approach on child wellbeing and safety issues
- value and embrace the opinions and views of children and young people
- assist children and young people to build skills that will assist them to participate in society
- are focussed and take action on the protection of children and young people from harm

In order to create and maintain a safe and friendly setting, where children and young people are protected and feel respected, BDSC has implemented several codes, policies, assessments and training, many of which are referenced within this document. These related documents have been submitted with this policy as part of our child safe environment compliance statement to the Department of Human Services, and most are available on request from us.

2. Document Scope

This document applies to **staff, volunteers, work experience students, contractors, parents and students**.

It is publicly available on our website to ensure all parties understand our commitment to creating and maintaining a child safe environment and understand their role within it. It is also formally issued to and acknowledged by all staff, at the commencement of their employment and whenever the policy is updated.

3. Our commitment to the safety of children and young people

BDSC recognises its legal obligations to ensure a child safe environment and confirms that our policy is compliant with the child safe environment provisions of the Children and Young People (Safety) Act 2017, Child Safety (Prohibited Persons) Act 2016 and the National Principles for Child Safe Organisations.

Above and beyond regulatory compliance, BDSC is committed to providing a service where the safety and wellbeing of children and young people is our highest priority. Our codes, policies, assessments and training ensure that children's safety and wellbeing is at the centre of our thoughts, values and actions.

- ★ We aim to provide an environment where children and young people feel safe, valued and respected, and an environment in which everyone is encouraged to fulfil their potential.
- ★ We are clear that bullying and harassment will not be tolerated.
- ★ We are committed to ensuring that every aspect of our environment, our people and our policies respect diversity and uphold equity.
- ★ We continuously strive to provide the highest level of care, and are committed to listening and responding to questions, feedback and complaints to create, maintain and improve our child safe environment.
- ★ Our codes, policies, assessments and training are designed to reduce the likelihood of harm, and increase the likelihood of identifying harm, to children and young people.

This document, and associated codes and policies detail the steps we take to achieve this.

4. Children's participation

It is expected at BDSC that all staff and volunteers positively engage our students in a way that suits the individual, according to age and respectful of culture, language or disability. To this end, every BDSC staff member is trained in our 4 point philosophy in the involvement of children and young people.

1. **Encourage** – Create an open and trusting environment that encourages children and young people to voice feedback or concerns
2. **Listen** – Show patience and understanding when children and young people speak
3. **Believe** – Believe what children and young people are saying, and value their input
4. **Respond** – Take appropriate action, according to BDSC codes and procedures

Through this approach we can gather feedback and act to continually improve our services and environment.

5. Code of Conduct

On commencing employment at BDSC all staff and volunteers are issued with our Blue Dolphin Swim Centre Employee Handbook. It is a requirement of employment that individuals read and provide signed acknowledgment that they will abide by all codes and principles outlined within the document. This includes our Code of Conduct.

The BDSC Code of Conduct clearly outlines our definitions and expectations of acceptable behaviour, ethical conduct and appropriate action at all times when in the employment of the centre.

Further to this, the Employee Handbook dedicates a section specifically to our Agreed Standards for Handling Children. This covers the mental, physical and emotional handling of children, to promote a safe, happy and healthy environment.

Caring for children and young people brings additional responsibilities for employees and volunteers of our organisation. All employees and volunteers of our organisation are responsible for promoting and protecting the safety and wellbeing of children and young people by:

- sticking to the organisation's child safe policy at all times and taking all reasonable steps to ensure the safety and protection of children and young people
- treating everyone (this includes staff, volunteers, students, children, young people and parents) including those of different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs with respect and honesty and ensure equity is upheld
- being a positive role model to children and young people in all conduct with them
- setting clear boundaries about appropriate behaviour between yourself and the children and young people in our organisation – boundaries help everyone to understand their roles
- listening and responding appropriately to the views and concerns of children and young people
- being alert to bullying behaviours and responding promptly and appropriately
- ensuring another adult is always present or in sight when conducting one to one coaching, instruction or other activity

- being alert to children and young people who have been harmed, or may be at risk of harm and reporting this quickly to the Child Abuse Report Line (13 14 78)
- responding quickly, fairly and transparently to any complaints made by a child, young person or their parent/guardian
- encouraging children and young people to 'have a say' on issues that are important to them.

Employees and volunteers must not:

- engage in rough physical games
- develop any 'special' relationships with children and young people that could be seen as favouritism such as the offering of gifts or special treatment
- do things of a personal nature that a child or young person can do for themselves, such as toileting or changing clothes
- discriminate against any child or young person because of age, gender, cultural background, religion, vulnerability or sexuality.

The process to deal with suspected breaches of all BDSC Codes & Policies is included in the Disciplinary Procedure.

Compliance with this Code, as with all law in an open society, depends primarily upon understanding and voluntary compliance, secondarily upon reinforcement by peer and public opinion. However, when necessary, compliance with all Codes and Policies is reinforced through disciplinary proceedings.

Breaches or suspected breaches of the Code of Conduct can be reported to management either in person, by telephone on 8322 6566, or via email at info@bluedolphinswim.com.au. Breaches or suspected breaches of the Code of Conduct will be taken seriously and dealt with quickly, fairly and transparently.

6. Recruitment Practices & Working with Children Check Requirements

At Blue Dolphin it is a legal requirement as a sporting club for all volunteers, trainees and employees regardless of their involvement with children and young people, to have an up to date, not prohibited Working with Children Check, issued by the Department of Human Services, before they carry out any activities on-site.

We are registered with the DHS Screening Unit and link all Working with Children Checks. For individuals new to BDSC we will verify the accuracy of their Working with Children Check, prior to them carrying out any activities, through the Organisation Portal via the DHS Screening Unit. For existing individuals, we will verify that they have renewed their Working with Children Check every 5 years, and their status remains as not prohibited. This is compliant with the Child Safety (Prohibited Persons) Act 2016.

In addition, we follow a rigorous, multi-stage interview and selection process to ensure our staff are suitable to work with children and young people.

Before any employee is given the responsibility to teach children and young people, the following process is carefully and consistently followed:

- Position advertised through online job seeking sites, in house advertising, social media and the company website, with advert including a clear description of the position. Applicants can apply online or alternatively submit a written application to our in-house Recruitment Officer.
- **Phase 1 Screening:** The recruitment officer will call the applicant to ask appropriate pre-interview questions and explain the job role in more depth.
- **Phase 2 Screening:** If the applicant is successful in phase 1, a face-to-face interview is conducted. This enables a more in-depth assessment of skills, experience and suitability for the role, including questions in relation to child safeguarding.
- **Phase 3 Screening:** If the applicant is successful in phase 2, a second interview is conducted in the pool with direct supervision and mentoring. This will assess candidate suitability for our specific environment.
- If successful the applicant is offered the opportunity to start training, conditional upon:
 - o A current, not prohibited Working with Children Check
 - o Suitable references, checked by our in-house Recruitment Officer
 - o Suitable qualifications. This is often desirable but not necessary for all roles.
- All candidates for Teaching roles are then required to complete a minimum of 40 hours of guided training, with progress and observations logged through their individual training logbook. Progress is carefully assessed at mid-point and the end of 40 hours.
- The Shift Supervisor will conduct a final review, marking off safety, engagement, teaching, development and knowledge, and provide a recommendation on how to proceed with each candidate. This may be to offer, release or extend training.
- Once the candidate has consistently attained the Blue Dolphin standard of teaching, only then will a position be offered.
- In order to take up employment, the candidate must sign and acknowledge all relevant Codes, Standards and Guidelines.

Blue Dolphin utilises a specialist HR software package to manage ongoing adherence to the required checks and qualifications required to fulfil each role and has real time access to the compliance status of all staff. Blue Dolphin HR is alerted to upcoming expiry of certifications, and follow up to ensure they are renewed before expiry. Should any employee become non-compliant, Blue Dolphin will suspend the staff member until this is rectified.

Blue Dolphin Swim Centre will advise the Screening Unit where the organisation becomes aware of certain information regarding any person involved with our organisation, including any serious criminal offence,

child protection information, or disciplinary or misconduct information.

Blue Dolphin invests a significant amount of time and resource to find, recruit, train and employ the right people for our business, for our customers and for their children.

7. Supervision, Training & Support

All Blue Dolphin staff are trained on the principles and practices of creating and maintaining child safe environments during their initial induction, before they commence working with children.

They are provided with a copy of the BDSC Employee Handbook and are required to read and provide signed acknowledgment that they will abide by all codes and principles outlined within the document. This includes our Core values, Code of Conduct, Agreed standards for handling children, Customer complaint policy and Disciplinary procedure.

All staff are also required to read and understand the Mandatory notification information booklet available at https://dhs.sa.gov.au/data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF.

Throughout the course of employment at Blue Dolphin, all staff will be observed and reviewed, on a regular and ad hoc basis. As a minimum this review will check compliance with BDSC standards but it is further intended to ensure all staff can perform to their best standard.

To ensure we maintain current, relevant and compliant training standards, our Recruitment Officer and in-house Trainer continually review external training courses that we may incorporate from time to time to supplement our own training.

8. Risk management

Blue Dolphin Swim Centre is committed to minimising or eliminating the risk of harm to children and young people and takes a proactive approach to the identification and mitigation of risk across all areas of our business. A full risk assessment is conducted annually, which considers (but is not limited to):

- Child handling – Physical
- Child handling – Emotional
- Capturing images of children
- Complaints handling
- Adherence to BDSC codes and policies
- Privacy and confidentiality

Following a review of these potential risks, BDSC agrees and implements steps to minimise or eliminate the opportunity for harm or risk of harm to occur. This output is documented and made available to all staff through our shared network and can be made available to customers on request. Our Risk Management Strategy is evaluated on a biennial basis.

9. Complaints and concerns

BDSC recognises and takes seriously the possibility that parents, children or staff may wish to make a complaint or raise concerns about our environment, services or people. We welcome this opportunity to identify and rectify issues and therefore provide clear mechanisms for this to occur.

The BDSC Parent Handbook is issued to all customers of the centre, and this clearly outlines the steps **customers** can follow should they wish to provide feedback about any aspect of our business or raise any complaint or concern.

We welcome new children and young people to the centre and teachers let them know at the first lesson, using age appropriate language, that they can provide feedback or make a complaint at any time.

Further, every BDSC staff member is trained in our 4-point philosophy in the involvement of children and young people, to help identify and understand the concerns of our **students**. This trains them to 'Encourage, Listen, Believe and Respond' (see Section 4)

The BDSC Employee Handbook includes details of the process **staff or volunteers** should follow in the case of actual or suspected breach of a BDSC Code or Policy.

All feedback, issues or concerns that are raised are documented, discussed and appropriate action agreed by all relevant parties. Where required and appropriate the outcome is fed back to the individual who initially provided the feedback, issue or complaint. Where the feedback, issue or complaint relates to behaviour towards, or affecting, a child or young person, BDSC's response will be immediate.

Should any employee or staff member have reasonable belief of actual or potential risk to the safety or wellbeing of a child or young person, they must take immediate action, and will refer and adhere to the guidelines outlined in Section 10 below.

BDSC is committed to ensuring all complaints and feedback are dealt with promptly, sensitively and fairly. The safety and protection of children and young people from harm is always our priority.

10. Reporting & responding to the reasonable belief that a child or young person may be at risk of harm

BDSC is committed to ensuring that children and young people are kept safe from harm and risk of harm.

All adult employees, volunteers and trainees have a legal obligation to:

- report child sexual abuse to the police and
- to protect a child from sexual abuse

Failure to meet these obligations may be considered a criminal offence (Criminal Law Consolidation Act 1935 (s.64A & s.65)).

BDSC believes that not only do we have an obligation to provide a physical environment free from risk of harm, but that we also have a responsibility to provide a cultural environment within which staff feel confident and supported to identify and report reasonable belief of harm or risk of harm, and that children and young people have the trust to disclose fear or incidents of harm, to themselves or others.

In order to develop this cultural environment, BDSC makes clear the responsibility of its staff and volunteers, provides clear guidelines on obligations and processes, and ensures follow up support for employees, volunteers, children, young people or families as required.

As a provider of sporting services to children and young people, **all employees and volunteers** within Blue Dolphin Swim Centre have a mandatory legal obligation to report any reasonable belief that a child or young person has been harmed or is at risk of harm.

All staff are required to read and understand the Mandatory notification information booklet available at https://dhs.sa.gov.au/data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF.

Reasonable grounds to form a suspicion that a child or young person may be at risk may include:

- when a child tells you they are at risk or have been harmed
- when your own observations of a particular child's behaviour and/or injuries lead you to reasonably believe they are at risk or harm is occurring
- when a child tells you that they know of someone who is at risk or has been harmed (they may possibly be referring to themselves)
- when you hear about a child at risk from someone who is in a position to provide reliable information, such as a relative, friend, neighbour or sibling of the child.

If employees and volunteers have reasonable belief that a child or young person may be at risk of harm, they MUST REPORT IT TO THE CHILD ABUSE REPORT LINE (CARL: PH. 13 14 78).

If any child or young person is at immediate risk, it should be reported to SAPOL on 000.

The person who identifies the harm or risk of harm is the person to make the report

BDSC staff and volunteers are required to do this thoroughly, quickly and with primary importance being placed on the safety and protection of children and young people.

Once a report has been made, BDSC recognises that this does not discharge its responsibility towards the protection of the child, and employees and volunteers may still have a role in supporting the child or young person. This support could include (but is not limited to):

- referring the child, young person or their family to other appropriate services
- continuing to provide a service to the child or young person and their family and monitoring their circumstances
- displaying information about services that can assist children and their families (such as the Kids Helpline 1800 55 1800 and Youth Healthline 1300 13 17 19) in areas accessed by children, young people and their families.

Further to this, BDSC also takes very seriously its responsibility toward protecting and supporting any employee or volunteer who makes a report of a reasonable belief that a child or young person may be at risk of harm.

Whilst legislation protects the reporter's identity from disclosure and provides that any individual reporting in good faith cannot be liable in any civil, criminal or administrative proceeding, BDSC is concerned with supporting the emotional impact of the event. To this end, BDSC has a support network available to any staff or volunteer who make a report, details of which are included in the Employee Handbook.

Whilst training for mandatory notifiers is not a legal requirement, BDSC ensures that through Induction, Training and the Employee Handbook, all staff and volunteers have a clear understanding of their obligations and understand the procedures and support available to them at any time.

Responding to and reporting reasonable belief of harm when there is suspicion a staff member may be involved

If an employee or volunteer has reasonable belief that a child or young person may have been harmed or be at risk of harm, and they suspect someone within the organisation is involved, they **MUST REPORT IT TO THE CHILD ABUSE REPORT LINE (CARL: PH. 13 14 78) IN ACCORDANCE WITH GUIDELINES ABOVE.**

Immediately after making the report, the employee or volunteer must report to either the Operations Manager and/or the HR Officer and/or the General Manager (whoever they feel most comfortable), reporting:

- That they have made a report to CARL
- The details included in the report
- Details of the staff member they suspect of being involved, and reason for this suspicion

The Operations Manager, HR Officer and/or General Manager will process the information in accordance with the BDSC Disciplinary Procedure.

11. Communication

It is essential to its effectiveness that this Policy is available to, and understood by, all BDSC staff, volunteers and customers. We also welcome feedback and input into the Policy to maintain its relevance. To this end, copies of this policy are published:

- Publicly on our website (<https://bluedolphinswim.com.au/CSE.pdf>)
- For all staff at Induction
- For all customers as a link within our Parent Handbook

This policy can also be provided electronically or in hard copy format, on request, at any time.

12. Related Policies & Procedures

The following related documents have been referenced within this Policy:

- Employee Handbook (Including Code of Conduct & Agreed Standards for Handling Children)
- Parent Handbook
- Annual Risk Assessment
- Mandatory notification information handbook available at https://dhs.sa.gov.au/_data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF

13. Evaluation and Review

It is a requirement of the Children and Young People (Safety) Act 2017 that child safe environments policies and procedures are reviewed at least once in every five years. In view of our commitment to the safety and wellbeing of children, our policy and associated procedures are routinely reviewed on a biennial basis, during BDSC July shutdown.

NEXT SCHEDULED REVIEW DATE FOR THIS POLICY: JULY 2025

Policies may also be reviewed and updated in the case that (but not limited to):

- new or additional risks are identified
- any incident or near incident occurs
- any significant change to management personnel occurs
- any concerns are raised, or feedback is provided that requires amendment or would make a positive contribution to ensuring a child safe environment
- awareness or compliance to this policy and it's associated Policies & Procedures is deemed low
- legislative changes

Blue Dolphin Swim Centre will lodge a new child safe environments compliance statement with Department of Human Services each time we review and update our policy.

Version tracking is included in Appendix 1.

Appendix 1: Document Tracking

Date	Detail	By	Version Number
07/12/19	Document Created	Angie Parker	1.0
25/02/20	Document submitted for approval	Angie Parker	1.0
21/03/20	Document published for public access	Angie Parker	1.0
27/03/20	Document approved by Department of Human Services	DHS CSE team	1.0
20/08/21	Document revised to include National Principles for Child Safe Organisations	Angie Parker	2.0
22/09/21	Document published for public access	Angie Parker	2.0
23/09/21	Document submitted for approval	Angie Parker	2.0
23/09/21	Amended document submitted for approval	Angie Parker	2.1
27/07/23	Biannual Review & Update	Angie Parker	2.2
18/09/23	Document revised to include feedback from CSEC	Angie Parker	2.3
18/09/23	Document submitted for review	Angie Parker	2.3
20/09/23	Document reviewed by Department of Human Services	CSE team	2.3
20/09/23	Document amended & published for public access	Angie Parker	2.4