





1. PURPOSE

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

The Complaints and Reporting Procedure is issued in connection with the Safeguarding Children and Young People Framework (**Framework**) and the Safeguarding Children and Young People Policy (**Policy**) and forms part of the Framework Documents.

NRL is committed to protecting the Children and Young People who participate in programs, activities, services and facilities across rugby league. Our staff and volunteers are required to respond to abuse or neglect perpetrated by staff and/or volunteers within our organisation or by other persons who may be external to NRL.

The unique needs of Aboriginal and Torres Strait Islander Children and Young People, Children and Young People from culturally and linguistically diverse (**CALD**) backgrounds and Children and Young People with a disability taken into account within the Framework documents.

All capitalised terms in the Complaints and Reporting Procedure are defined terms which can be found in the Dictionary of the Policy which forms part of the Framework Documents, unless the context of their use is otherwise.

NRL Safeguarding Children and Young People Complaints and Reporting Procedure – South Australia

Policy owned by the Australian Rugby League Commission

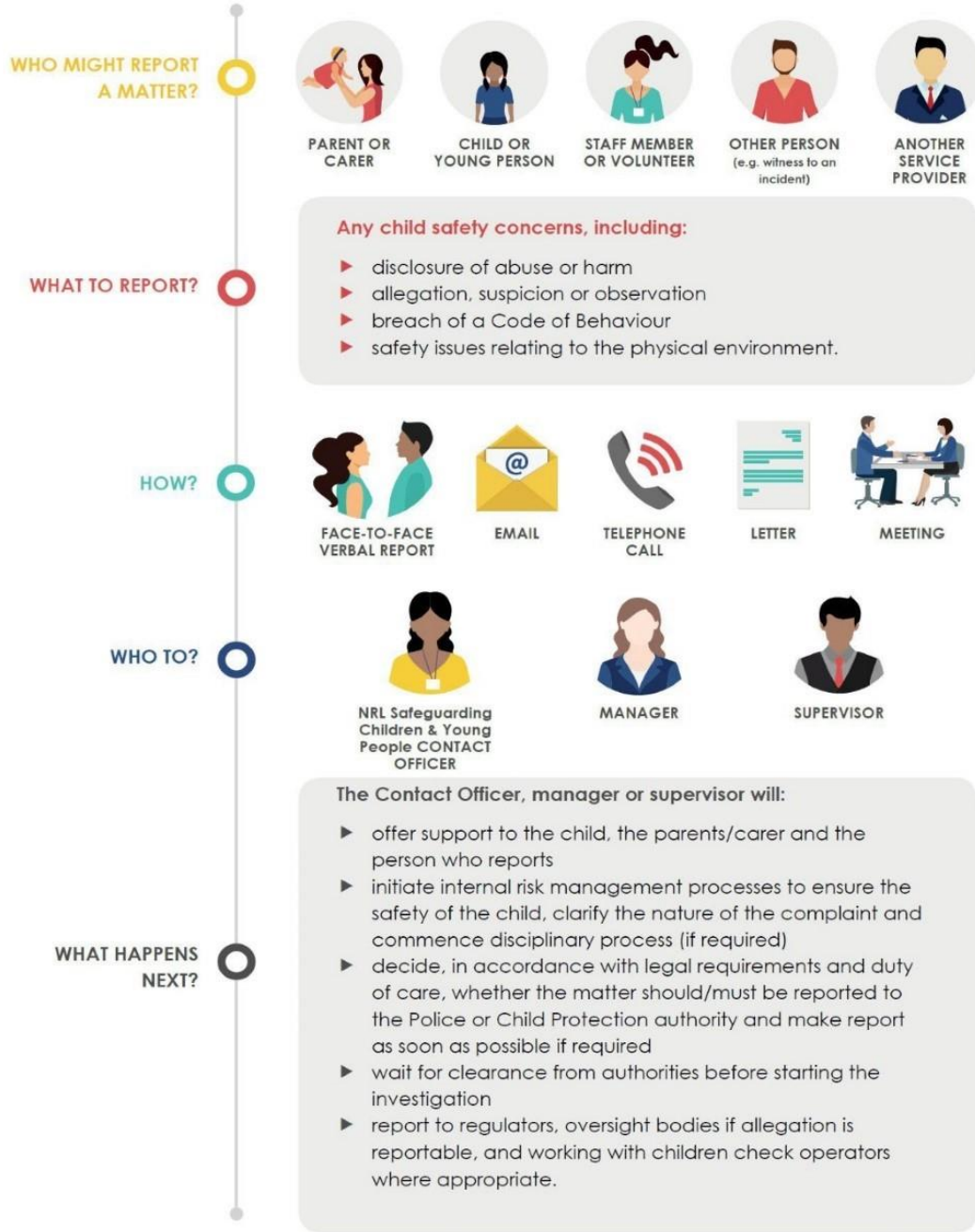
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For further information about this policy contact the NRL Child Safety and Policies Officer



Flowchart – Child safety reporting process within an organisation

REMEMBER! Always call 000 if a child is in immediate danger





2. FRAMEWORK DOCUMENTS

- I NRL Safeguarding Children and Young People Code of Behaviour (**Code**);
- I NRL Safeguarding Children and Young People Recruitment and Screening Requirements (**Recruitment and Screening Requirements**);
- I NRL Safeguarding Children and Young People Induction and Training Requirements (**Induction and Training Requirements**);
- I NRL Safeguarding Children and Young People Complaints and Reporting Procedure (**Complaints and Reporting Procedure**);
- I NRL Code of Conduct (Community Rugby League); and
- I NRL Code of Conduct (Employees).

Capitalised words in Code have the meaning as set out in the Policy.

3. SCOPE

The Complaints and Reporting Procedure applies to all NRL People and is operational across the NRL including:

- I all NRL staff (employees and contractors);
all employees and contractors of the NRL Affiliated States;
- I Volunteers, coaches, sports trainers and participants who have a current and valid registration via the NRL Competition Management System;
- I anyone engaged to provide NRL Services on behalf of NRL;
QRL - (including all staff, employees, contractors, volunteers, coaches, sports trainers and participants) where the Framework is adopted; and
- I NSWRL - (including all staff, employees, contractors, volunteers, coaches, sports trainers and participants) where the Framework is adopted.

In circumstances where the Complaints and Reporting Procedure does not apply to NRL clubs, state or community leagues, the NRL is committed to supporting the understanding of the NRL commitment to safeguarding Children and Young People through provision of resources, access to training materials and transparent and consistent communication.





4. CHILD SAFETY OFFICER

Affiliated States and each affiliated club **MUST** appoint a Child Safety Officer and a Member Protection Officer.

5. WHO MAY REPORT TO YOU

Who may report a matter to you in your role:

- Parent or carer
- child or young person
- Volunteer
- Other person (eg witness to an incident)
- Another service provider

6. DECIDING WHETHER TO REPORT TO POLICE IMMEDIATELY

REMEMBER! Always call 000 if a child or young person is in immediate danger.

What is Harm, risk of harm, abuse or neglect?

The effect of the harm, risk of harm, abuse or neglect must have more than a minor impact upon a child's physical, psychological or emotional wellbeing. Serious concerns include when you suspect a child or young person is in imminent or immediate danger.

Examples of this may be:

- Any type of sexual abuse
- Any type of grooming
- Non-accidental physical bruising
- Emotional harm causing detrimental effect to the child
- Serious neglect (This may include starvation, severe obesity)

How to report to the police:

- face to face verbal report
- telephone call

For more information please visit - <https://www.childprotection.sa.gov.au/reporting-child-abuse/report-child-abuse-or-neglect>





7. WHAT TO REPORT TO THE CHILD ABUSE REPORT LINE

A mandated notifier is required by law to notify the Department for Child Protection if they suspect on reasonable grounds that a child or young person is, or may be, at risk of harm.

This obligation arises when a mandated notifier forms this suspicion in the course of their employment (whether paid or voluntary).

The report should be made as soon as possible.

What to report - child safety concerns, including:

- Any concern reported to the police involving a child at the club and reported as a result of your role at the club.
- Any other disclosure of abuse or harm not reported to the police
- Allegation, suspicion, or observation of harm or risk of harm
- Breach of a Code of Behaviour

How to report to the President or child safety Officer:

- face to face verbal report
- email
- telephone call
- letter
- meeting





8. WHAT HAPPENS NEXT

On receiving a report about harm to a child or young person, the Child Abuse Report Line (CARL) social worker is responsible for:

- deciding whether there are legal grounds for Department for Child Protection intervention
- whether Department for Child Protection intervention is required
- the type of response that is warranted.

The club President or Club Child Safety Officer will:

- Initiate risk management processes to ensure the safety of the child, clarify the nature of the incident and commence disciplinary process if required.
- Wait for clearance from authorities before starting any internal investigation to prevent preconditioning witnesses or destroying the chain of evidence.
- Report to regulators, oversight bodies if allegation is reportable and working with children check operators where appropriate.
- Provide you feedback on what steps the club undertook.
- Please note: It is not the President's or Child Safety Officer's role to decide if it is a reportable matter. If the person who formed the belief is unsure if it will meet the threshold, they can consult with the Child Protection Authority not the administrative unit of a sporting organisation eg President or Child Safety Officer
- Offer support to the child and family and the person who made the report

9. REPORTING TO THE NRL

The NRL requires the club president or Child Safety Officer to advise the NRL Safe Children unit any of the following types of behaviours, including observed or suspected harm or abuse, in relation to any Child or Young Person involved in NRL activities, programs, services or facilities must be reported in the manner described in this Complaints and Reporting Procedure:

- I Disclosure of abuse or harm by a Child or Young Person;
- I Allegation, suspicion or observation of abuse or harm of a Child or Young Person; Breach of the Code; and
- I Safety issues regarding the physical environment where Children





Examples of scenarios which may be signs of harm or risk of harm:

- Distrust or wariness of adults;
- Extreme behaviour - aggressive, submissive, anxious, distressed;
- Low self-esteem, being withdrawn or having difficulty relating to adults or other children;
- Being overly obedient and trying hard to please;
- Difficulty concentrating;
- Excessive rocking, humming, sucking or biting;
- Bedwetting, frequent nightmares or sleeping difficulties (seeming tired and falling asleep at unusual times);
- Seeming to be accident prone or having unexplained bruises or injuries at different stages of healing;
- Explanations for injuries that are unbelievable, vague or don't align with the type of injury;
- Alcohol or drug abuse;
- Suicidal tendencies;
- Not wanting to go home (or somewhere else);
- Creating stories or artwork about abuse; and
- Inappropriate sexual knowledge or behaviour for the age and development of the child.

10. HOW TO MAKE A REPORT TO THE NRL

- I In the first instance the report should be submitted by email to safechildren@nrl.com.au
- I NRL people must report child safety concerns that they are informed of, observe or suspect
- I Immediate action will be taken in relation to any matter reported by the NRL
- I The NRL will act with integrity, provide strong leadership and make decisions that are child centered, legal, ethical, accountable and transparent whilst meeting national legislative requirements.





11. PRESIDENT AND/OR CHILD SAFETY OFFICER INVESTIGATION PROCESS

- Step 1:** If the Child or Young Person is in imminent risk of harm or immediate danger, the person who forms a suspicion is required to report the situation directly to the police.
- If the concern relates to any type of sexual abuse or grooming, the matter must be reported immediately to police by the person who forms the suspicion.
- If the child or young person is not in immediate risk of harm, you are required by law to report to the Child Abuse Report Line on 13 14 78. The person who has the suspicion or belief of harm is the person who must make the report.
- When deciding whether to report or not to police or child safety the Government has a online Child Protection Guide to assist. This can be found at [South Australia Department of Child Protection](#) or www.childprotection.sa.gov.au
- Always err on the side of caution and report if undecided.
- Step 2:** Affiliated State or club representative to contact the NRL Child Safety Officer by emailing safechildren@nrl.com.au or in person to advise of the situation and clarity response.
- Step 3:** Ensure the person raising the concern has documented the complaint or concern properly. Review the information and follow up any points which need clarification.
- Step 4:** Any complaint or allegation of abuse or inappropriate conduct should be addressed promptly, seriously and with a high degree of sensitivity and confidentiality.
- If the child is at risk of being subject to sexual abuse or inappropriate conduct including grooming by a member of the NRL at any level a report MUST be made by notifying Police straight away.
- Step 5:** Managing the matter.
- Follow any advice by the Police, Department for Child Protection or The NRL Safe Children Officer.
 - Member Protection officer to be involved and to manage liaison with relevant parties





- Assess the immediate risks to any other children at the organisation. Take any actions to ensure safety is maintained. This may include:
 - standing down a person from their role at the club, or
 - keeping a person from attending the club, or
 - deploying a person to a role where contact with children is avoided, or
 - take other action that is deemed reasonable.

Step 6: Establish next steps to effectively respond to the allegations as information comes to hand.

Step 7: Provide support to children and members. Seek assistance from the NRL with this to ensure the person providing the support does not attempt to provide support which is outside their scope of their role.

If the matter relates to the conduct of a member of the club take appropriate disciplinary action to address the issue. Advice should be sought from the NRL before finalising any action.

11.1 REPORTING TIMEFRAMES

A mandated notifier must make the notification as soon as is reasonably practicable after forming the suspicion. Refer to www.childprotection.sa.gov.au for helpful guidance around deciding when to report concerns to the Child Abuse Report Line.

11.2 MANDATORY REPORTING PROVISIONS

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

The following link will direct you to the responsibilities associated in South Australia:

South Australia Department for Child Protection or www.childprotection.sa.gov.au

The steps provided in this Policy will ensure steps taken will meet any requirements outlined in the above link.





11.3 WHAT IS MANDATORY REPORTING?

In South Australia a mandated notifier is required by law to notify the Department for Child Protection if they suspect on reasonable grounds that a child or young person is, or may be, at risk or harm.

This obligation arises when a mandated notifier forms this suspicion in the course of their employment (whether paid or voluntary)

If a mandated notifier forms a suspicion outside of their work (whether paid or voluntary) that a child or young person is, or may be, at risk of harm, they may make a notification to the Department for Child Protection voluntarily.

11.4 WHO INVESTIGATES THE REPORT?

Legislative and policy requirements will dictate how the report is handled and investigated. Where the report is of a particular nature and legislative requirements apply, NRL will ensure that one (1) or more of the following entities will investigate the report or disclosure:

- State or Federal Law Enforcement Agency (i.e. Police) Where Required;
- Department for Child Protection where required;
- the NRL (legal or integrity); and
- Where the report or disclosure does not require reporting to a nominated authority, the NRL may undertake some investigations of the disclosure either through internal resourcing or by appointing an independent third party advisor with specialty experience in the area of Child Safe processes.

At no stage will the NRL investigate in parallel to a State or Federal Law Enforcement Agency or statutory child protection authority (i.e. Police, or South Australia Department for Child Protection) investigation. The NRL will only investigate once they have received confirmation and permission in writing from the relevant Law Enforcement Agency (i.e. Police, or South Australia Department for Child Protection) that their investigation is completed.





12. MINIMUM REQUIREMENTS - RESPONDING TO DISCLOSURES OF HARM OR RISK OF HARM TO A CHILD OR YOUNG PERSON

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

DO

- ✓ Actively listen to the Child or Young Person and encourage them to talk in a 'free narrative'. Let them tell their story without interruption or prompts to continue or expand
- ✓ Adopt an open and accepting manner - avoid facial expressions or comments which may suggest disbelief, disapproval or approval of particular evidence
- ✓ Reassure the Child or Young Person that they have done the correct thing by reporting
- ✓ Respect the Child or Young Person may only reveal some details
- ✓ Let the Child or Young Person use their own words in their own time - be patient
- ✓ Ask open ended questions
- ✓ Explain to the Child or Young Person that other people may need to be told
- ✓ Keep any records of the discussion safe and secure

DO NOT

- ✗ Ask leading questions
- ✗ Make your own judgement or assessment
- ✗ Press for detail, a minimal account will suffice
- ✗ Make promises you cannot keep
- ✗ Share information with others unless legally required to





12. CONFIDENTIALITY & PRIVACY

Confidentiality and privacy of all concerned (including the alleged perpetrator) will be maintained by NRL, except if doing so would compromise the welfare of Children and Young People and/or investigation of the allegation.

NRL Legal will be responsible for the authorisation of the disclosure and sharing of any information relating to any incident reported pursuant to this procedure except where disclosure or sharing is required by law.

13. MONITORING

All reports recorded will be reviewed by a designated member of the NRL Legal team or other person nominated by the Chief Executive Officer. Only the nominated person is authorised to close a case and will ensure all relevant persons have been informed of the outcome.

14. INCIDENT REPORTING PROCESS

14.1 WHAT TO REPORT

- Observed Abuse, Harm or Neglect - (Emotional, Physical, Sexual)
- Potential Abuse Harm or Neglect - (Emotional, Physical, Sexual)
- Any suspicion of Abuse, Harm or Neglect - (Emotional, Physical, Sexual)
- Breaches of the Code, Code of Conduct (Community Rugby League) and/or Code of Conduct (Employees)

14.2 WHAT HAPPENS TO THE REPORT

- Assessment of report for investigation allocation (Police and/or NRL)
- Provide wellbeing and support service referrals for Child, family and other relevant parties

15. NRL RESPONSIBILITIES

- Mandatory Reporting Requirements (Police, OHS, Other)
- Where required, NRL Safeguarding Children & Young People Policy Incident Reporting Process
- Legislation relevant to the protection of Children & Young People is binding on the NRL and all NRL People
- A full list of legislations is set in the Appendix





Appendix

Complaint Record Form

Date:		Your name:		Position:	
How was the complaint received (e.g. phone, email, in person)			Complaint record reference:		
			Complaint assigned to:		
Name of complainant					
1. Name of child or young person/Name of person making the complaint [if different]:					
Name of the person who the complaint was made about [if applicable]:					
Contact details:					
4. Complainant contact details:					
a. Address:					
b. Phone number:					
c. Email:					
*Preferred contact method: _____					
Details relating to the child or young person:					
5. Age:					
6. Gender:					
7. Do they identify as Aboriginal or Torres Strait Islander?					
8. Are they from a culturally and linguistically diverse background? If, yes, specify:					
9. Are they in out-of-home care?					
10. Do they have a disability? If, yes, provide any relevant details _____					
11. Do they have communication support needs? If yes:					
<input type="checkbox"/> Was the child or young person offered an interpreter?					
<input type="checkbox"/> Was the child or young person offered a communication assistant?					
<input type="checkbox"/> Was the child or young person offered a support person, advocate, family member?					
<input type="checkbox"/> Any other supports?					
12. Provide any relevant information relating to the child or young person's preferred communication methods, support needs, and involvement in the complaint-handling process:					





13. If the complainant has a disability, provide any relevant details relating to their guardianship, advocacy or other decision-making arrangements (e.g. the name and contact details of any nominees authorised to receive information on their behalf):

Details relating to the complainant (if made by an adult on behalf of the affected child or young person)

14. Age:

15. Gender:

16. Relationship to the affected child or young person:

17. Do they identify as Aboriginal or Torres Strait Islander?

18. Are they from a culturally and linguistically diverse background? If yes, specify:

19. Do they have a disability? If, yes, provide any relevant details _____

20. Do they have communication support needs? If yes:

- Was the complainant offered an interpreter?
- Was the complainant offered a communication assistant?
- Any other supports?

21. Provide any relevant information relating to the complainant's preferred communication methods, support needs, and involvement in the complaint-handling process:

Nature of the complaint:

22. Complaint description (accurately record the issues, concerns, details of any witnesses, as far as possible in the child's own words):

23. What outcome to the complaint is the complainant seeking?

Immediate risk considerations:

24. Details of any injuries and if the child or others received medical attention:

25. Does the complaint indicate the possibility of criminal conduct? Yes/No/Unsure

26. Is a mandatory child protection report required? Yes/No

27. Does the complaint involve a reportable allegation/incident? Yes/No/Unsure

28. Is any immediate risk management action required? Yes/No

Next steps:

Signed: _____

Date: _____

Print name: _____

Complaint records should be meticulously and accurately maintained and securely stored in compliance with legal requirements.

