

Melbourne City FC Safeguarding Policy



INTRODUCTION

Melbourne City Football Club (“**the Club**”) is committed to creating and promoting a safe environment and culture where the well-being of children and vulnerable adults will always be put first. The Club’s Safeguarding Policy supplements the City Football Group’s (CFG) Safeguarding Policy, incorporating the standards contained within the Victorian Child Safe Standards and informed by the findings of the Victorian Family and Community Development Committee and the Royal Commission into Institutional Responses to Child Sexual Abuse.

On the 13th of November 2013 the Family and Community Development Committee of the Victorian Parliament tabled the report of its inquiry into the handling of child abuse by religious and other non-government organisations (the Betrayal of Trust Inquiry). The report provided 15 recommendations, including the introduction of minimum standards for ensuring child-safe environments. These recommendations were divided into three categories; prevention, response and access to justice, and form the basis of the Victorian Child Safe Standards.

In 2013, the Australian Governor-General established the Royal Commission into Institutional Responses to Child Sexual Abuse. The Royal Commission’s final report was handed down on 15 December 2017, including a volume on sport, recreation, arts, culture, community and hobby groups, which made further recommendations for a national strategy to protect children in institutions.

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TERMINOLOGY & DEFINITIONS

Aboriginal or Torres Strait Islander person: “An Aboriginal or Torres Strait Islander is a person of Aboriginal or Torres Strait Islander descent who identifies as an Aboriginal or Torres Strait Islander and is accepted as such by the community in which he [or she] lives.” (Commission, Australian Law Reform, 2010)

Abuse: Abuse is defined as any action that intentionally harms or injures another person. There are many kinds of abuse encountered by people, including but not limited to: physical abuse, psychological or emotional abuse, sexual abuse domestic/family abuse and neglect.

Adult: For this policy an ‘adult’ is defined as a person 18 years old and older.

‘Betrayal of Trust’ Inquiry: The Family and Community Development Committee of the Victorian Parliament inquiry into the handling of child abuse by religious and other non-government organisations which was held from 2012-2013. It investigated how such organisations handle allegations of child abuse; whether there are systemic practices in such organisations that operate to preclude or discourage the reporting of suspected child abuse to State authorities; and whether such organisations required reforms to prevent and respond to child abuse.

Child/Children: For this policy a 'child' is defined as a person below the age of 18.

Child Protection: Child protection is defined as measures and structures to prevent and respond to abuse, exploitation and violence affecting children. Child protection means safeguarding children from harm. The goal of child protection is to promote, protect and fulfil children’s rights to be protected from abuse, exploitation and violence.

Cultural Diversity: Cultural diversity refers to people who identify with particular groups based on their birthplace, ethnicity, language, values, beliefs, culture or world views. This does not mean that everyone from a particular cultural group will hold exactly the same values or do things in the same way.

Safeguarding: Safeguarding is aimed at protecting vulnerable children or adults from abuse in all circumstances. Safeguarding means putting processes in place to ensure that vulnerable people are not abused in any way, including verbally or physically. This includes all procedures designed to prevent harm, and also refers to the process of protecting children and adults by providing safe and effective care.

Vulnerable Adult - also known as “Adults at Risk”: The Club considers a vulnerable adult to be an individual who is or may be for any reason unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. This may be due to physical or intellectual disability, older age, mental health issues, homelessness or experiencing domestic violence.

Workforce: This refers to any person, employed or deployed, by managers to work on a paid or voluntary capacity on a Melbourne City FC activity. Such individuals may be full-time, or part-time, permanent or fixed term staff employed directly by the Club; they may be deployed by the Club on a temporary or casual basis; or they may be volunteers deployed by management; they may be deployed via a third-party contractor, grantee, licence holder, or partner.



1. PURPOSE

This policy is a statement of ethical and protective practice standards, principles, values and behaviours expected for all members of the workforce. The intention of this document is to educate as well as implement good safe practice standards to:

- ensure compliance with relevant legislation and regulation;
- minimise the risk of the possibility of harm and abuse occurring to children and vulnerable adults;
- ensure that safer recruitment principles are implemented to ensure that unsuitable individuals are not recruited into positions working with children and vulnerable adults;
- outline the Club's response to concerns, complaints and allegations relating to the potential abuse and harm to children and vulnerable adults; and,
- provide ongoing support and services to children and vulnerable adults as appropriate.

Should a member of the Club's workforce wish to make any enquiries in relation to this policy, please contact the Safeguarding Manager in confidence at SafeAtCity@melbournecityfc.com.au.

2. POLICY STATEMENT

The Club is committed to ensuring that children and vulnerable adults who participate in its activities have a safe and happy experience. In doing so, the Club seeks to provide a culturally safe environment "which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued".¹

The Club is also committed to providing the highest level of service in all our products and activities. This includes promoting positive behaviours and attitudes towards children and vulnerable adults; tirelessly protecting their wellbeing; and always acting in their best interests while delivering safe, high-quality activities.

Safeguarding is a shared responsibility across all members of the workforce and participants in Club activities. Everyone involved in Club activities is responsible for the proactive care and protection of children and vulnerable adults. This includes protecting the rights of children and vulnerable adults and reporting any potential or actual concerns regarding any form of harm, abuse or poor working practice.

The Club is committed to having a zero-tolerance approach to abuse and poor working practice. We will comply with all applicable laws and standards and not tolerate any form of misconduct from any member of the workforce or participant. In enforcing the Club's disciplinary procedures for non-compliance with the CFG's Safeguarding Policy, the Club's Safeguarding Policy and the Safeguarding Code of Conduct, we will also seek to provide training and guidance to members of the workforce or participants, where appropriate.

The Club supports the active participation of all children and vulnerable adults in developing policy and procedure. The Club is committed to informing children and vulnerable adults of their rights, listening to their views, respecting their views and involving them when making decisions, where appropriate, especially about matters that will directly affect them and their peers (including their safety).

¹ Cultural safety is "an environment that is safe for people: where there is no assault, challenge or denial of their identity, of who they are and what they need. It is about shared respect, shared meaning, shared knowledge and experience, of learning, living and working together with dignity and truly listening." See: Williams, R. 2008 at <https://ccyp.vic.gov.au/assets/resources/tipsheet-cultural-safety-aboriginal-children.pdf>



All children and vulnerable adults have equal rights to protection from harm and abuse, regardless of their gender, religion, beliefs, disability, sexual orientation or other diverse background. As such, the Club is also committed to the cultural safety of children and vulnerable adults who are Aboriginal, Torres Strait Islander, from culturally diverse backgrounds and/or living with a disability.

The Club is also committed to the promotion of fairness and consideration across its workforce. For further details please refer to the Club's Human Resources Policies, Casual Employee Policy, Volunteer Policy, the FA Member Protection Policy, FA Safeguarding Policy, and Sport Integrity Australia 'Independent Complaints Handling Process (Football Australia)'.

This Safeguarding Policy applies to all members of the Melbourne City FC workforce, including:

- full-time, part time and casual paid staff;
- contracted staff;
- volunteers;
- placement and work experience students and interns;
- CFG workforce (visiting or short-term posting); and,
- International visitors (visiting or short-term posting).

3. LEGAL & REGULATORY REQUIREMENTS

This policy is aligned with:

1. The United Nations Convention on the Rights of the Child 1989.
2. The laws of the Commonwealth of Australia and Victoria including but not limited to:
 - a. Children, Youth and Families Act 2005 (Vic);
 - b. Child Wellbeing and Safety Amendment (Child Safe Standards) Act 2021 (Vic)
 - c. Crimes Act 1958 (Vic); and,
 - d. Working with Children Act 2005 (Vic); and,
3. The CFG Safeguarding Policy.

4. TYPES OF ABUSE

Abuse refers to an act committed by a member of the workforce, parent, caregiver, person in a position of trust, or another child or vulnerable adult which is not accidental and which harms or threatens to harm a child's or vulnerable adult's physical or mental health and welfare. Abuse can be categorised as (but is not limited to): physical abuse, sexual abuse, grooming, emotional & psychological abuse and neglect. Abuse of children or vulnerable adults is sometimes described as misuse of power and a violation of trust. The following are examples of the different types of abuse:

Physical Abuse

Physical abuse occurs when a child or vulnerable adult suffers or is likely to suffer significant harm from a non-accidental injury (or injuries) inflicted by another person. Physical abuse can be inflicted in many ways, including beating, shaking, burning, biting, cutting or use of objects to cause harm. Physical abuse can also occur in the form of inappropriate disciplinary actions or sanctions such as physical punishments during a football training session.



Sexual Abuse

Sexual abuse occurs when a person involves a child or vulnerable adult in sexual activity, or deliberately puts a child or vulnerable adult in the presence of sexual behaviours that are exploitative or inappropriate to their age and development. Where an adult is in a position of trust within a workforce any such behaviours may be deemed abusive and could constitute a criminal offence.² Sexual abuse can involve a range of sexual activities including but not limited to inappropriate touching, fondling, masturbation, penetration, sexting, voyeurism and exhibitionism. It can also include exposure to or exploitation through pornography, child pornography, or sexual exploitation, as well as grooming behaviour.

Grooming

Grooming is when a person engages in predatory conduct to prepare a child or young person for sexual activity at a later time. Grooming can include communicating and/or attempting to befriend or establish a relationship or other emotional connection with the child or their parent/carer.

Emotional / Psychological Abuse

Emotional/Psychological abuse occurs when harm is inflicted on a child or vulnerable adult through repeated rejection, isolation, or exposure to threats or violence. It can include derogatory name-calling, peer shaming and put-downs, or persistent and deliberate coldness from a person, to the extent where the behaviour of the child or vulnerable adult is disturbed, or their emotional development is at serious risk of being impaired.

Bullying can include acts that are physical, psychological, verbal as well as 'cyberbullying'. These acts can include behaviour such as threats and abusive and offensive words or conduct. Bullying acts that are categorised as 'serious' can include behaviour that is intended, or could reasonably be expected, to cause the victim of the bullying to engage in suicidal thoughts or thoughts or actions that involve self-harm. Amendments to Victoria's *Crimes Act 1958* (Vic) in 2011 introduced anti-bullying provisions (known as 'Brodie's Law'³), which categorised such 'serious' bullying actions as criminal offences.

Harassment includes behaviour such as telling insulting jokes about a distinct racial group, displaying racially offensive or pornographic materials, making derogatory or humiliating comments about someone's race, or physical abilities, and can extend to asking intrusive questions about person affairs.

The conduct of harassment can amount to illegal behaviour when it is discriminatory, it includes conduct of a sexual nature, or if it causes a risk to a person's health or safety.

² The Victorian Department of Justice & The Model Criminal Law Officers Committee recognise that young people can be vulnerable and sexually exploited by a person in a position of trust regardless of their general capacity to consent. Where there is a relationship of care, supervision or authority between an adult and a child under the age of 18 years old, any sexual activity between the adult and the child is an abuse of trust and an offence under the *Crimes Act 1958* (Vic). A person in a position of trust can be considered as the child's parent, foster parent, teacher, employer, youth worker, sports coach, counsellor, health professional, etc.

³ These 2011 amendments to the *Crimes Act 1958* (Vic) (aka 'Brodie's Law') applies to all forms of 'serious' bullying occurring anywhere in the physical community, such as workplaces, schools, and sporting clubs, as well as applying to behaviours conducted via the internet including email or use of social networking sites.



Neglect

Neglect is the continued failure to provide a child or vulnerable adult with the basic necessities of life, such as food, clothing, shelter, hygiene, medical attention or adequate supervision. Neglect can also occur if an adult fails to adequately ensure the safety of a child or vulnerable adult where they can be exposed to harmful, dangerous or life-threatening situations.

(In the context of the workplace, a dictionary term of 'neglect' might extend to a staff member being aware of a child or vulnerable adult being the subject of abuse and not reporting their observations to appropriate authorities. Such instances are addressed in section [9] of this policy titled 'Mandatory Reporting in Victoria', reviewing the concepts of 'failure to disclose' and 'failure to protect'.)

For more examples on the types of abuse please refer to Appendix 2 of the CFG Safeguarding Policy.

5. VICTORIAN CHILD SAFE STANDARDS & PRINCIPLES

The Victorian Child Safe Standards & Principles focus on an organisation's commitment to promote child safety, prevent child abuse and respond to suspected child abuse. The Standards provide a framework for the Club to develop policies, procedures and strategies that embed a culture of child safety into everyday thinking and practice and reduce the risk of child abuse being perpetrated by members of the workforce. They are flexible, allowing the Club to develop an approach to compliance that is relevant, contextualised and sustainable. The Club will also apply the Child Safe Standards and Principles, where appropriate, to vulnerable adults.

Child Safe Standards

There are eleven standards and three principles established by Victoria's Commission for Children and Young People that the Club is committed to implementing.

The eleven Child Safe Standards are:

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



Child Safe Principles

As part of the Child Safe Principles, the Club values and celebrates diversity within the community and workforce, and actively encourages the safety, participation and empowerment of all children and vulnerable adults from culturally diverse backgrounds. The Club is committed to applying the three Child Safe Principles established by Victoria's Commission for Children and Young People.

1. Promoting the cultural safety of Aboriginal children.

- Aboriginal children are significantly over-represented in institutions including child protection, youth justice and out-of-home care systems. The reasons for this are complex and influenced by past policies like forced removals, the effects of lower socio-economic status and differences in child rearing practices and intergenerational trauma. Additionally, impacts of abuse are heightened for Aboriginal children who may not feel culturally safe enough to report abuse.
- The Club aims to promote cultural safety of Aboriginal children within the Club environment by:
 - consulting with local Aboriginal people, Aboriginal Community Controlled Organisations (ACCOs) and relevant local organisations with 'Reconciliation Action Plans' for appropriate guidance; and
 - engaging employees in cultural learning opportunities to increase understanding and appreciation of diverse cultures such as Aboriginal and Torres Strait Islander cultures, languages, histories and achievements.

2. Promoting the cultural safety of children from culturally and linguistically diverse backgrounds.

- Culturally and linguistically diverse children, particularly those from refugee or asylum seeker communities, are also more likely to have experienced trauma or displacement and loss (or have parents who have) before coming to Australia. Culturally diverse children and families may also experience communication barriers when it comes to reporting abuse and knowing where to go for support.
- The Club aims to promote a sensitive and inclusive environment for these children and vulnerable adults by:
 - ensuring the Club clearly demonstrates a zero tolerance of discrimination;
 - providing training and development to members of the workforce and, where applicable, participants, on cultural sensitivity and competency;
 - being respectful, inclusive and welcoming of families from a range of backgrounds by asking children and families about their culture and cultural support needs;
 - seeking to employ staff that are representative of the diversity of your local community employing staff who display cultural sensitivity and cultural competency; and
 - when engagement with the local community, asking families about their preferred format for the provision of information, including translation or interpreting into community languages.

3. Promoting the safety of children and adults with disabilities.

- People with a disability have the same rights and responsibilities as other members of the community and should be empowered to exercise those rights and responsibilities. Children and adults with a disability have an increased risk of being abused compared with children without a disability. Several factors may contribute to the risk of abuse including physical impairments or difficulties with speech and communication, memory, literacy, vision and hearing impairments, and reliance on caregivers.



- The Club aims to promote a safe physical and online environment for children and vulnerable adults by:
 - providing training and information to all staff regarding online safety, according to CCYP Guidelines; asking children, vulnerable adults and people with a disability about their particular needs;
 - using a Safeguarding Risk template when planning new activities that could involve children, vulnerable adults and people with a disability; and
 - ensuring all people attending a Club activity are aware of how to report a Safeguarding concern.

Personal and Professional Responsibility

The principle of taking personal and professional responsibility requires not only that people avoid doing harm to others, but that they also report instances of suspected harm, as well as exhibiting courteous behaviour upholding the standards expected of all as part of achieving the common good. The Club's workforce is expected to protect the rights of others and respect the diversity of cultures and children and vulnerable adults. Those well-positioned enough to assert their rights have a reciprocal duty to exercise care towards those who depend on them for their well-being, this includes the care and protection of a child or vulnerable adult.

The Club's workforce is expected at all times to be good role models, ensuring appropriate professional standards of behaviour as detailed in the Safeguarding Code of Conduct.

6. MELBOURNE CITY FC SAFEGUARDING CODE OF CONDUCT

Everyone plays a role in safeguarding the welfare and development of children and the protection of other vulnerable people.

While Club activities are many and varied, regular settings that involve staff engaging with children and/or vulnerable adults include match day activities (such as on-pitch experiences, pre-match commercial sponsor activations, or season ticket member engagement); junior player development and Academy trainings, matches, and excursions; and CiTC community engagements, along with assisting the progression of Academy players in to Club senior football squads.

As an individual responsible for children or other vulnerable people taking part in a Club activity you have a duty to:

- **Ensure that the safety and welfare of all participants is your first priority** and ensure that any planning, preparation, delivery or review reflects this duty, and all actions are in the best interests of those in your care.
- **Treat children and other vulnerable people with respect**, regardless of their gender, ethnic or social background, language, religious or other beliefs, disability, sexual orientation or other status and encourage them to treat others the same way. Always consider the age, maturity, understanding and emotional condition of participants when working with them.
- **Listen carefully to children and vulnerable people** about their needs, wishes, ideas and concerns and take them seriously.
- **Reward effort as well as performance.**
- **Only use physical contact with participants where absolutely necessary.** If contact is necessary, (e.g., for the purposes of coaching or first aid), then explain to the child what the contact is for, and change your approach if he or she appears uncomfortable and conduct this in an open and transparent way.



- **Establish clear codes of conduct for participants and apply disciplinary policies equally and fairly** in respect of poor behaviour. Physical punishment or discipline or use of aggressive physical force of any kind towards any participant in your care is prohibited.
- **Always use language or behaviour towards participants and others that is appropriate** and do not use language or behaviour that is or could be considered harassment, abuse, sexually provocative or demeaning. You are a role model to both participants and other members of the workforce, your appearance, attitude, behaviour and language has a direct effect on your role.
- **Not supervise or care for others whilst under the influence of alcohol or illegal drugs** or any medication that may impair your ability to ensure a player's welfare.
- **Not appear to favour one child or show interest in one child more than another.**
- **Wherever possible, ensure that more than one member of the workforce is present when working in the proximity of children or other vulnerable people.** It is inappropriate to spend excessive time alone with those children you supervise or care for or to take them to your home.
- **Always maintain professional boundaries in person and online.** Do not engage in physical 'horseplay' with any participants and where possible avoid personal involvement in the activity you are responsible for. Be careful when engaging participants in 'banter' as this can easily be misunderstood. Recognise the danger to self and others when online.
- **Not engage in any form of sexual activity with or involving a child or vulnerable person in your care.** Such activity is prohibited regardless of the legal age of consent, and is considered a breach of this Policy.
- **Report any concerns you have over a person in your care or the actions of a member of the workforce.** If you witness or are told about any incident or issue that may put a vulnerable person at risk or harm, or may breach this policy, you have a duty to report it to the appropriate person (and only share the information with those who need to know) This may be your line manager or designated Safeguarding Rep.

To assist in planning a Club activity and adhering to these duties, you should conduct a pre-event risk review which includes considerations around staffing. To help adhere to the Code, it is recommended that if hosting children at an event or activity, there are a minimum of two employees present (along with any other greater number that may be recommended under the Department of Education Victoria guidelines).⁴

It is everyone's responsibility to uphold this Code. Any breach of the Code is likely to lead to disciplinary action and may, in some cases, lead to criminal prosecution.

7. MELBOURNE CITY FC SAFEGUARDING TEAM

The roles in the Melbourne City FC Safeguarding Team include Head of Legal, Safeguarding Manager, and various Safeguarding Reps from different Departments, appointed throughout the Club.

Safeguarding Manager – Asia-Pacific East

Based in Melbourne and reporting to the Melbourne City FC Head of Legal, the Safeguarding Manager for Asia-Pacific East is responsible for setting the policies, procedures and training requirements for all of City Football Group's operations in the region, which includes the operations of Melbourne City FC, and the activities of the

⁴ For under 10 age groups see: [Educator to child ratios \(education.vic.gov.au\)](http://education.vic.gov.au) (re "above pre-school age") for guidance. For over 10 age groups see <https://www2.education.vic.gov.au/pal/excursions/guidance/supervision> (re "day excursions") for guidance as to recommended ratios.



City in The Community charitable organization, which has its administrative offices at the Melbourne City FC premises.

The Safeguarding Manager will also conduct investigations into reports of safeguarding incidents, poor practice and breaches of protocol. If you or a member of the public have safeguarding concerns, you may contact the Safeguarding Manager at safeatcity@melbournecityfc.com.au.

Melbourne City FC Safeguarding Reps

Each department or Club activity involving children will have one or more designated Safeguarding Reps. The role of the Safeguarding Rep is to:

- ensure compliance with this policy in their department or team;
- provide practical guidance and implementing recommendations to improve the safety of Club operations, including;
 - be the frontline contact for safeguarding concerns, incidents or reports from children, vulnerable adults, parents or witnesses;
 - assist the Safeguarding Manager to ensure safer recruitment, WWC check and training requirements are met for new starters in the business; and
- meet at least twice annually with Safeguarding Team.

8. MELBOURNE CITY FC SAFER RECRUITMENT PRACTICES

The Club seeks to implement recruitment and screening practices that reduce the risk of harm and abuse to children and vulnerable adults, which are also requirements under the Child Safe Standards. A vigorous recruitment process will ensure that the Club only employs the most suitable applicants who will help to create and foster a safe environment.

The Club is committed to a safer recruitment process and will achieve this by implementing the following critical steps detailed below.

Selection Criteria

The Club will implement appropriate selection criteria for all positions that involve working with children and vulnerable adults. This will help in reducing the risk of appointing someone who poses a safety or safeguarding risk to children and/or vulnerable adults. It will also ensure that applicants have the specific knowledge, experience and skills required for the position.

An example of appropriate selection criteria the Club will use includes:

- *‘Must have experience working with children and vulnerable adults’; or,*
- *‘Must be able to demonstrate an understanding of appropriate behaviour when engaging with children and vulnerable adults’.*

Applicants will have the opportunity to indicate their understanding and any experience they have in working with children and vulnerable adults with diverse needs or background and the role they will play in maintaining a safe environment.



Advertising

When advertising for a position, the Club will demonstrate its commitment to safeguarding children and vulnerable adults to deter unsuitable applicants who may pose a risk. When advertising for a position, the Club will promote the safety, participation and empowerment of all children and vulnerable adults. The Club will acknowledge the importance of creating a safe environment for children and young people who are Aboriginal or Torres Strait Islander, or children and vulnerable adults who have a disability or are from a culturally or linguistically diverse background. The Club will attach a statement to this effect to all advertised positions, for example;

- *‘Melbourne City FC is committed to the safety and wellbeing of all children and vulnerable adults, with a focus on empowering children and vulnerable adults who are Aboriginal or Torres Strait Islander, from a culturally diverse background, or who have a disability. Employment with Melbourne City FC is subject to a safer recruitment screening process.’*

Interviews

The Club will use the interview process as an important step in selecting the right applicant and in identifying any applicant who may pose a risk to children or vulnerable adults. An open-ended style of behavioural questioning may be utilised to give insight into the applicant’s values, attitudes and understanding of professional boundaries and accountability. The following questions are examples that may be used in the interview process:

- *Tell us about why you want to work with children and vulnerable adults?*
- *Describe a time when you had to manage a child or vulnerable adult whose behaviour you found challenging? What was your process?*
- *Tell us about a time when you had to comfort a child or vulnerable adult in distress? What was your process?*
- *What is your understanding of the Victorian Child Safe Standards?*
- *What is your knowledge of mandatory reporting? What would you do if a child disclosed information of abuse? What would you do if they asked you not to tell anybody?*

Where the role will require working directly with children, the Safeguarding Manager will be involved in the recruitment process. The Club will take notice of the applicant’s responses to the relevant questions. The Club will seek further information if the applicant does not provide sufficient information in their responses. The Club will be wary of the following warning signs:

- unexplained lengthy gaps when detailing or describing employment history; or,
- the applicant says they do not value or need supervision; or,
- the applicant is evasive or inconsistent in their answers.



Pre-employment Screening

Screening applicants is a vital component of the Club's safer recruitment process and will help in preventing individuals who may pose a risk to children or vulnerable adults from entering the organisation. The following checks will be utilised:

Working with Children Check: Under the *Working with Children Act 2005 (Vic)*, people who are engaging in regular child related work need a valid Working with Children Check (WWCC). This pertains to both paid staff members and volunteers, including players, and interns. In the instance where a WWCC has been approved, but the card is yet to arrive, the Club requires:

1. A screenshot/copy of confirmation from WWCC Victoria of approved card and new card number
2. Photo ID including Date of Birth and current photo.

As the Club strives to be a child safe organisation with children and young people regularly having access to its premises, the Club **requires all members of the Club's workforce to have a valid WWCC.**

Under Victorian Law, Workers and volunteers need to update their WWCC Victoria status to include Melbourne City FC within 21 days of commencement with the Club.

Matters involving any staff member or volunteer who refuses to comply with these Victorian WWCC requirements will be referred to HR and the Head of Department.

Referee Checks: Once an applicant has completed a successful interview; the Club will contact a minimum of two of the applicant's referees which will provide insight into the applicant's character and skills. An applicant's referees will be asked to provide insight into the applicant's experience with working with children and vulnerable adults. The Club will establish the referee's relationship with the applicant by asking appropriate questions such as:

- How long the applicant and referee worked together?
- The specifics of the applicant's position?
- The applicant's perceived strengths and weaknesses?
- Whether the referee would employ the applicant again?
- Whether they have any concerns about the applicant working with children or vulnerable adults?

Members of City Football Group Workforce (visiting or short-term posting)

All visiting or short-term postings of the CFG workforce that are engaged in child related work will be expected to contact their local Safeguarding Manager and request clearance be provided to the Safeguarding Manager before the CFG member arrives at the Club, if the local Safeguarding Manager has current background checks are on file. Where clearance cannot be obtained, the CFG worker will be required to provide a criminal history check covering each country that the member has lived in for more than 12 months in the past 5 years.

International Visitors (visiting or short-term posting)

All international visitors or short-term posts (non-CFG workforce) that are engaged in child related work are required to provide a current criminal history check covering each country that they have lived in for more than 12 months in the past 5 years.



Visits or posting that exceed 30 days

When a visit or short-term posting of a CFG member of the workforce or an international or interstate visitor to the Club is likely to exceed 30 days, the CFG staff member, international or interstate visitor will be required to apply for a Victorian WWCC and fulfil the Club's Safeguarding training requirements (including completing the 'Play by the Rules' online training), regardless of whether they are regularly engaged in child related work.

Safeguarding Training

The Club is committed to maintaining the highest standards in its Safeguarding programme and as such it is **mandatory that all staff and volunteers complete appropriate Safeguarding training**. This may be online training, face-to-face training or both.

Introductory safeguarding training will be required before the staff member, volunteer or intern has entry to the City Football Academy. Swipe cards may be issued to staff once Safeguarding requirements have been met, including: a copy provided of WWCC current card, Safeguarding training with Safeguarding Manager, relevant Play by the Rules courses ("Child Protection", "Harassment and Discrimination").

Visitors, interns and volunteers are to be supervised by staff – with a particular staff member designated upon their arrival to the City Football Academy before they are permitted to enter the premises - and will not be given a swipe card.

Online training

To support safeguarding awareness and ongoing education, all staff and volunteers will be required to complete online safeguarding courses from time to time. A PDF copy of the certificates must be sent to the Safeguarding Manager as evidence of completion.

Examples of online training programs may include:

- The Play by the Rules online Child Protection course and the Harassment & Discrimination course. These Play by the Rules courses are available free of charge and can be accessed securely via the following link:
<https://elearning.sportintegrity.gov.au/login/index.php>
- FIFA Guardians provides courses in Safeguarding such as "FIFA Guardians™ Safeguarding Essentials":
<https://safeguardinginsport.fifa.com/open-learners/>

Face-to-face training

As part of their induction, new staff and volunteers will be required to complete a face-to-face training session with the Safeguarding Manager.

Additional training sessions will be periodically held for all staff across the business to refresh knowledge and provide updates and more targeted training.



9. MANDATORY REPORTING IN VICTORIA

Reporting child abuse is a community-wide responsibility. The Victorian *Crimes Act 1958* imposes a clear legal duty upon all adults to report information about child sexual abuse to the police to ensure the immediate safety for all children. Two key criminal offences relating to child protection were introduced to the *Crimes Act* in 2014:

- *Failure to Disclose* – this relates to all members of the workforce, not just professionals that work with children; and,
- *Failure to Protect* – this relates to any member of the workforce who is in a position of authority.

The Club recognises the obligations relating to child protection and applies it such that all members of the Club's workforce are required to know and understand the following elements of this legislative requirement:

Types of offences that need to be reported to the police

All adults must report sexual offences committed by a person of the age of 18 against a child under 16, including but not limited to:

- Sexual penetration of a child
- Sexual activity in the presence of a child
- Encouraging sexual activity
- Rape
- Incest
- Sexual Assault
- Sexual touching
- Grooming
- Offences committed via electronic communication
- Abduction

What does it mean to 'form a reasonable belief'?

You will form a reasonable belief that a sexual offence has been committed if a reasonable person, with your skills and experience, would have formed such a belief. You do not need to have proof or evidence. A reasonable belief means it is more likely than not that it happened. A reasonable belief might be formed when:

- a child states that they have been sexually abused;
- a child states that they know someone who has been sexually abused (sometimes the child may be talking about themselves);
- someone who knows a child states that the child has been sexually abused;
- professional observations of the child's behaviour or development leads a professional to form a belief that the child has been sexually abused; and/or,
- signs of sexual abuse leads to a belief that the child has been sexually abused.

Offence: Failure to Disclose

- It is a criminal offence for an adult in Victoria to 'fail to disclose' to the police any reasonable belief that a sex offence has been committed by an adult against a child under the age of 16. Section 327 of the Victorian *Crimes Act 1958*, states that any adult who forms a 'reasonable belief' that sexual abuse has been committed by an adult against a child has an obligation to report that information to police. This law applies to all adults, whether they have a child related job or not, and whether they come across information in their professional or private lives. Except in very limited circumstances, failure to disclose the information to police is a criminal offence and carries a maximum penalty of three years



imprisonment. In the event a disclosure by a worker relates to another member of the CFG workforce, the worker should also report the matter to the Safeguarding Team.

Offence: Failure to Protect

- Under section 490 of the Victorian *Crimes Act 1958*, it is an offence for a person in a position of authority to fail to protect a child from a sexual offence if, due to their position within the organisation, they have the power or responsibility to remove a substantial risk that a child under the age of 16 years will become a victim of a sexual offence, and:
 - they know there is a substantial risk that a person will commit an offence against a child; and
 - despite this they neglect or fail to reduce or remove the risk; and
 - the sexual offence is committed by a person over the age of 18 years who is also associated with the relevant organisation.

This crime is punishable by up to five years imprisonment.

When to report?

As soon as any immediate health and safety concerns are addressed, you **must** report all incidents, suspicions and disclosures of child abuse to police as soon as possible. You should also report these instances to the Safeguarding Manager.

If you think an incident is serious enough to be considered child abuse or a criminal offence, but are unsure whether it requires a mandatory report to police, please urgently contact the Safeguarding Manager to review.

Reporting other child abuse concerns

If a member of the Club's workforce has any other concerns regarding suspected child abuse or harm (involving a category of abuse that is not part of those listed as 'types of offences that need to be reported to police'), then under sections 28 and 31 of the *Children, Youth and Families Act 2005 (Vic)*, any person may make a report to the Victorian Department of Health and Human Services or to DHHS family services such as Child FIRST and Child Protection.

Actions that a member of the Club's workforce may look to report include, but are not limited to, behaviours such as domestic violence, cyberbullying, bullying, or neglect.

If you need any assistance in making a report to police or child protection services, please contact the Safeguarding Manager or email safeatcity@melbournecityfc.com.au, so the Safeguarding Manager can assist in guiding you through the reporting process.



10. CLUB REPORTING PROCEDURES

The Club supports and mandates that all members of the Club's workforce to make a report when they form a reasonable belief that a child or vulnerable adult needs protection, or when they are concerned about the safety, health or wellbeing of a child or vulnerable adult. Such reports must be made to the Safeguarding Manager or a Safeguarding Rep in the first instance unless there is immediate and/or serious harm or risk of harm to a child or vulnerable adult, when the police should be called. This is especially the case when any delay in action may result in even more serious harm.

If a member of the Club's workforce is uncertain as to whether they should make a report in relation to the safety of a child or vulnerable adult, they must speak to the Safeguarding Manager for guidance and information - if in doubt, ask for assistance.

The Club will investigate allegations of inappropriate conduct against, or maltreatment of, a child or vulnerable adult in accordance with procedural fairness and will handle the allegations in a confidential manner where appropriate. The Club will keep a register of all allegations regarding inappropriate conduct and poor practice. All records and reports will be taken seriously, treated respectfully and kept securely, taking into consideration privacy, confidentiality and regulatory requirements.

If an allegation is made against a member of the workforce, the Club will follow the reporting procedure outlined in the CFG Safeguarding Policy (found on the staff intranet), and take all steps to ensure that the safety of the child or vulnerable adult is paramount.

For more information relating to raising Safeguarding concerns please refer to page 23 of the CFG Safeguarding Policy. Appendix 1 of this policy outlines the immediate response to an incident involving a child or vulnerable person.

Your responsibilities

- Under the CFG Safeguarding Policy and the Club's Safeguarding Policy you are obliged to make a report if you have formed a reasonable belief that abuse has occurred or is about to occur.
- You must make a report without delay by completing a CFG Safeguarding Referral Form (available on the Club intranet or from a member of the safeguarding team).
- All concerns must be documented in this way.
- You are required to make a report each time you become aware of any further grounds for your belief.
- You don't have to prove that the abuse has occurred, however you need to report the matter to the Safeguarding Manager or a Safeguarding Rep as soon as possible.
- You must not initiate leading questions to confirm a belief about what happened, however, when appropriate, you can seek clarification about what has been disclosed.
- It is the Safeguarding Manager's responsibility to ensure that all members of the Club's workforce follow protocols when investigating the report, and to respond appropriately to the information received; this may include passing information on to senior management or the appropriate authorities where required.



Liaison with CFG Safeguarding Unit

Whilst the immediate response to concerns must be managed and co-ordinated locally, the Club recognises its membership of CFG and its Group Safeguarding Unit and safeguarding framework – “SafeAtCity”. As such, the CFG Director of Safeguarding will be notified of High and Medium risk concerns at the earliest opportunity. In return the CFG Safeguarding Unit will provide professional and practical support, guidance and, where appropriate, challenge the concern management process.⁵ The Club will also provide regular updates to CFG on concern management data and statistics for presentation to senior managers, Leadership Teams and CFG Board.

11. POLICY BREACHES

Any member of the Club’s workforce who breaches the CFG Safeguarding Policy, the Club’s Safeguarding Policy or Safeguarding Code of Conduct may be subject to disciplinary action.

Breaches of these policies may result in disciplinary sanction, including termination of employment, or investigation by the statutory authorities (e.g., police).

⁵ See also the CFG Concern Management Policy and Protocols.



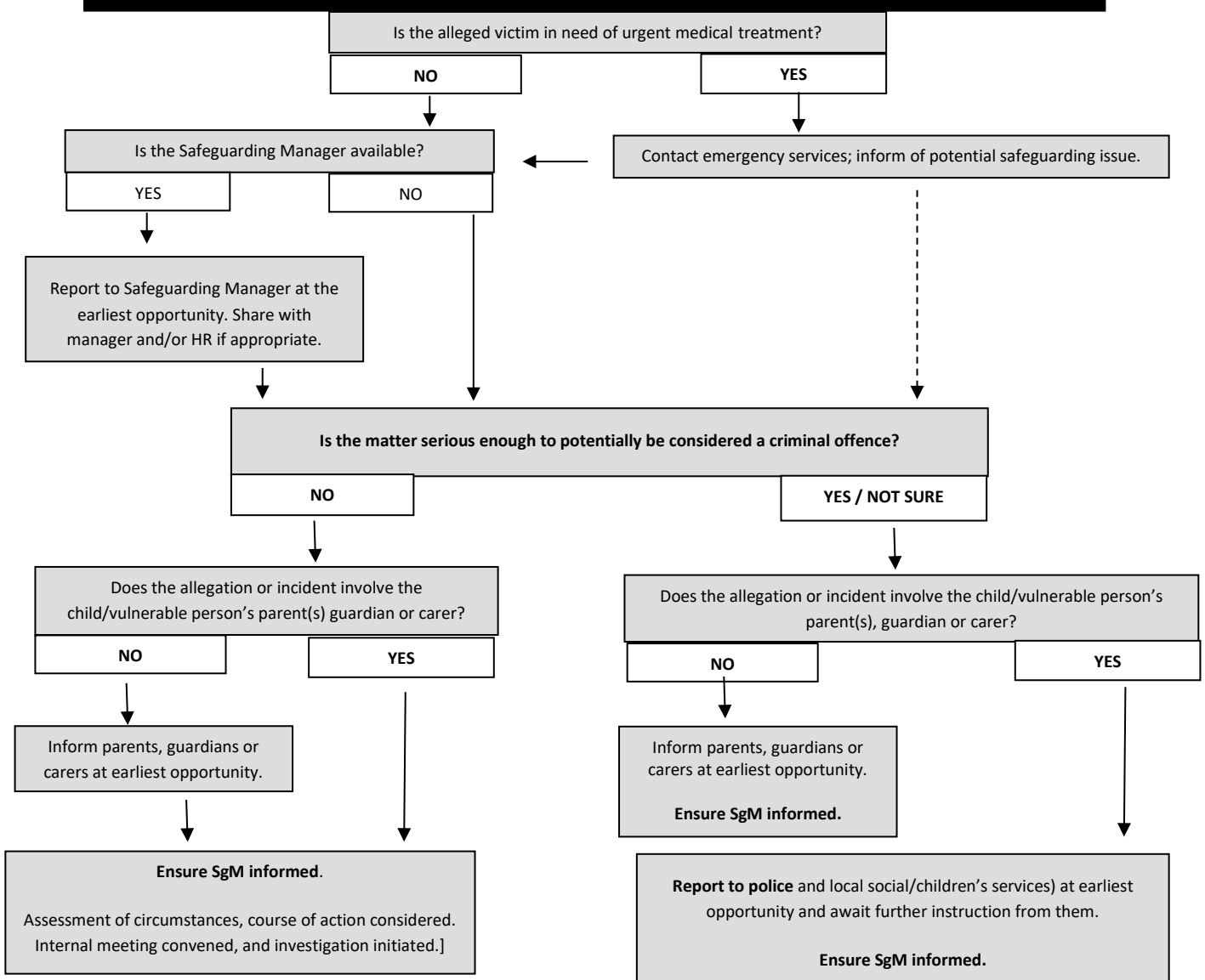
APPENDIX 1

The flowchart presented below details the immediate response to an incident or concern involving a child or other vulnerable person.

A child or other vulnerable person* has disclosed concerning information to you OR you have witnessed or had reported to you an incident or complaint involving a child or other vulnerable person*, which may be considered abuse or poor practice.

**It is essential when considering an incident or concerns involving an adult who may be vulnerable to obtain the consent of that adult before referring the matter to a statutory agency, unless there is an immediate risk of harm.*

STAY CALM – REASSURE – TAKE SERIOUSLY – NO PROMISES – FEW QUESTIONS – FOLLOW GUIDE



Whatever the circumstances, the person receiving and then reporting the complaint or incident must record a written statement for internal recording, preferably using Incident Report Form. This form will be submitted to the designated Safeguarding Rep at the earliest opportunity who will inform the CFG Safeguarding lead at the earliest opportunity.

APPENDIX 2

City Football Group Safeguarding Referral Form



Required for any reported incident where a child or vulnerable may be subject to harm or risk of harm from the actions or omission from another (adult or other child).

Please email to safeatcity@melbournecityfc.com.au for further advice please contact the Safeguarding Manager or your nearest Safeguarding Rep.

Is the risk of harm immediate or serious? If so, you may need to contact the police at the earliest opportunity.

| Safeguarding Team use only: | | | | | |
|---|----------------|---------------------------|---|----------------|---------------------------|
| Safeguarding Manager/Rep risk assessment | | | SgM/Rep to enter High/Med/Low/No in this box | | |
| Final risk assessment if different | | | | | |
| External Referral Checklist (for consideration) | Yes / No / tbc | Decision log / commentary | Internal Referral Checklist (for consideration) | Yes / No / tbc | Decision log / commentary |
| Police | | | Legal | | |
| Child First | | | HR | | |
| Social Services DHHS | | | Comms | | |
| Education organisation (e.g., school) | | | Line Manager | | |
| FA/FV | | | Other | | |
| Children and Young Person's Commission / CCYP | | | | | |

| Referrer to complete | | | |
|--|----------------------------|--|-----------------------|
| Date of Referral | | | |
| Risk Level How would you classify this concern? (High, Medium, Low, No) Please see over for guidance..... | | | |
| CFG Club or Company | | | |
| Department | | | |
| Person Referring (you) | | | |
| Contact Details (your) | | | |
| Is this concern | a) direct from a child? | | b) your own concerns? |
| | c) someone else's concern? | | If someone else, who? |
| | d) from another agency | | If, so, who? |
| Does the child or their parent or vulnerable adult know that you have made this referral? | | | |

[Please speak to your Safeguarding Manager before making further contact with child or family]

Date of concern / incident

Name(s) of Child, Children or Vulnerable Adult(s)

Child or Vulnerable adult?

Date(s) of Birth

Gender

Ethnicity

Disability

Contact Details

(parents/guardians if refers to a child)

Person(s) alleged to have caused harm or risk of harm

Employee?

Role

Relationship to victim(s)

Contact details

Tell us exactly what you were told or what you saw in the very first instance – this is the ‘First Account’?

[Exact words used by someone else or a clear description of what you saw; or SgM may attach an email or scan of handwritten notes]

Details of incident or concern

[Please give outline of the concern – what, who where, when – detail as much as you feel is necessary; please stick to the facts]

What type of concern would you call this?

Neglect, Physical Abuse, Emotional Abuse, Sexual Abuse, Bullying, Financial, Grooming, Mental Health, Welfare issue, Poor Practice

Have you or anyone else done anything in relation to this incident of concern

[e.g., Rung the police, reported to your manager, kept evidence etc]

Do you hold any evidence relevant to this matter? If so, what?

[please attach any valuable evidence as appendix; **although do not view or send any images or material that may be considered indecent or illegal – please tell us if this was unavoidable**]

Thank you.

We all work together, across the City Football Group, to help keep children and vulnerable adults safe. Where anyone has a concern, it is important to pass it on as soon as you can and as honestly as you can.

| Colour | Risk Level | Criteria and examples | Immediate action |
|--------|------------|--|--|
| | High | Serious harm or risk of harm to a child or vulnerable adult, likely or actual criminal activity and clear abuse of a child or vulnerable adult perpetrated by an adult or someone in a position of trust or potentially a member of the workforce who has perpetrated a crime outside of the business activity. Fits into one or more categories of abuse: Physical, Sexual, Emotional or Neglect; risk of serious reputational harm to the business. Will require the involvement of statutory agencies. Any matter of a sexual nature is usually categorised as High. Matters referred in by the police will almost certainly be High. | Notify statutory agencies if legal duty requires it. Notify Senior Management & Board. Notify Chief Comms. Notify FA or PL if appropriate. |
| | Medium | Potentially serious matters, that relate directly to categories of abuse but may also include serious bullying type behaviour. Has the potential to be criminal but may include regulatory breaches under governing body regulations (eg sport position of trust); likely to have risk of reputational damage and media interest. Risk of significant but not necessarily serious harm. Near misses. May require consultation with statutory agencies but they decide on NFA. May include some sexual matters but unlikely to be criminal (eg underage consensual between two children). Likely to require FA/PL referral or at least consideration of such. might require ongoing support / counselling organised by CFG. | Consider Statutory agencies. Notify Senior Management & Comms. Consider FA / PL notification. |
| | Low | Low level mildly-abusive type behaviour or bullying that may be one off or accidental or non-malicious. Little risk of harm or actual harm to a child. Still requires safeguarding or other involvement but lacks the seriousness to involve any external agencies. May not have drawn a direct complaint but has been referred out of a low level concern. Internal disciplinary matter. Breach of club or CFG protocol. Remains a slight chance of reputational risk. | Consider notify senior management and comms if there are newsworthy elements. |
| | No | Minor concern that represents no risk of harm to anyone or no reputational risk to the business. Quickly dismissed or dealt with. Mistaken concerns or confusion over an issue. Matters that do not fit into a safeguarding framework but involve a child. No chance of reputational risk. | Share decision back and instruct on minor actions or no action. |