



WAVERLEY
Gymnastics Centre

Child Safe Complaints Handling Procedure
August 2025

Authorisation

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1 Purpose

Waverley Gymnastics Centre ('WGC') is committed to fostering an open complaints culture where all individuals feel comfortable raising concerns. WGC takes all child safety concerns and complaints seriously and responds promptly. The *Child Safe Complaints Handling Procedure* ('this Procedure') outlines the process for responding to, reporting, investigating, and recording child safety complaints.

2 Scope

This Procedure extends to all aspects of activities and programs provided by WGC, which involve, result in or relate to contact with children (including those in the physical and online environments). It applies to all individuals who conduct work for, or are connected to WGC in a paid or unpaid capacity, including:

- Committee members
Club CEO
- Staff
- Contractors and sub-contractors, including sports medicine physicians and physiotherapists

(collectively referred to in this Procedure as 'personnel').

3 Terms and Definitions

For the purposes of this Procedure:

Table 1: Terms and Definitions

Term	Meaning
CALD	Culturally and Linguistically Diverse.
Child	Refers to a person under the age of 18 years, unless under the law applicable to the child, majority is attained earlier. Reference to child includes young person, and reference to children includes young people.
Child abuse	Refers to the acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. The forms of child abuse are: <ul style="list-style-type: none">• Sexual abuse• Emotional abuse• Neglect• Physical abuse• Exposure to family violence.
Child Safeguarding and Wellbeing Manager	Refers to the individual appointed by WGC responsible for matters relating to child safety and wellbeing, including the management of child safety complaints.
Child Safeguarding and Wellbeing	Refers to the volunteer committee member responsible for overseeing child safety matters at WGC and supporting the Child

Committee Officer	Safeguarding and Wellbeing Manager in responding to child safety complaints.
Complainant	Refers to the person who is making a complaint.
Emotional abuse/ Psychological abuse	Refers to inappropriate verbal or symbolic acts by an adult towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability.
Exposure to Family or Domestic Violence	Refers to any form of abusive behaviour by a person towards another family member. The abuse can be physical, sexual, emotional, psychological, economical, threatening, or coercive type behaviour. It is also a form of abuse when a child is exposed to, hears or witnesses any of the effects of the abusive behaviours.
GA	Gymnastics Australia.
Grooming	Grooming is a form of sexual abuse. It refers to actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a child, to lower the child's inhibitions in preparation for sexual activity.
Gymnast	Refers to an individual who participates in WGC's program (includes children and young people).
Neglect	Refers to the failure to provide a child with conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing, such as: <ul style="list-style-type: none"> • Food • Clothing • Shelter • Hygiene • Medical attention, or • Adequate supervision. Neglectful behaviours are an act of omission, or by wilful choice.
Physical abuse	Refers to the use of deliberate physical force against a child that intentionally or unintentionally results, or has the likelihood of resulting, in harm.
Prohibited conduct	Refers to a range of conduct as prescribed at clause 4 of the Safeguarding Children and Young People Policy including: <ul style="list-style-type: none"> • Convicted of breaking a child abuse or grooming state/territory or Commonwealth law • Misconduct with a child • Request to keep communication a secret • Supplying alcohol drugs or medicines • Failing to comply with child safe practices and recruitment and screening requirements • Committing any act that would constitute prohibited conduct under GA's <i>Member Protection Policy</i>. Further guidance on what constitutes Prohibited Conduct is provided at Appendix D .
Respondent	Refers to the person who is the subject of a complaint.

Sexual Abuse	Refers to when a person exposes a child to, or involves a child in, sexual activity that: <ul style="list-style-type: none"> • The child does not fully comprehend • The child is unable to give informed consent to • The child is not developmentally prepared for, and • Is contrary to acceptable community standards.
SIA	Sports Integrity Australia.
Spectator	Refers to an adult (who is not staff) who visits the facility, such as a responsible adult who accompanies a gymnast to a WGC class or program.
Staff	Refers to any person who is employed by WGC (paid and unpaid).
WGC	Waverley Gymnastics Centre.

4 Child Safe Complaints Procedure

When responding to child safety complaints, the steps outlined in this Procedure should be followed. Personnel should also refer to the following:

- **Appendix A** - Complaint Handling Flowchart
- **Appendix B** - Child Safe Legal Obligations
- **Appendix C** – Child Safety Incident Report Form
- **Appendix D** – Reporting to Sports Integrity Australia
- **Appendix E** – Complaints Review and Analysis Guidance

5 Child Safe Complaints Process

5.1 Receiving Complaints

A child safety complaint may include:

- A **suspicion** that child abuse may be occurring, or that a child may be at risk of abuse
- A **concern** that has been raised about a child's safety
- An **allegation** that has been made against a person concerning their behaviour towards a child
- A **disclosure** of abuse made by a child, or an adult on behalf of a child
- A **breach** of WGC's *Child Safety and Wellbeing Policy*, WGC's *Child Safe Code of Conduct*, or GA's *Safeguarding Children and Young People Policy*.

Immediately after receiving a complaint, personnel should contact the Child Safeguarding and Wellbeing Manager for support and guidance on how to respond. If the Child Safeguarding and Wellbeing Manager is not available, contact the Child Safeguarding and Wellbeing Committee Officer.

WGC will not penalise anyone who makes a complaint in the best interest of the child.

5.2 Responding to Child-Initiated Complaints

WGC is committed to ensuring that all children feel comfortable voicing concerns or complaints regardless of their age, ability, or other personal characteristics. We acknowledge that children with diverse needs and those with additional vulnerabilities may require more support than others when raising a concern or complaint.

When responding to a child who is making a complaint, personnel should **LISTEN**, **REASSURE** and **RESPECT** the child, as outlined in Table 2 below.

Table 2: Responding to Child-Initiated Complaints

Action	Description
Listen	When a child is making a disclosure, you should: <ul style="list-style-type: none">• Allow the child to use their own words when expressing their concerns• Consider whether the child's parent/guardian should be present• Ensure the environment is safe, comfortable, and respectful of the child's right to privacy• Remain calm and patient• Be supportive, reassuring and comforting if the child is upset• Ask open ended questions, not suggestive or leading questions• Do not interrogate the child, you should avoid asking too many questions that may overwhelm them• If the alleged incident happened at a WGC facility, ask the child if the person is still in the building and if they can describe the person• If the abuse happened at home, ask the child to provide more detailed information.
Reassure	Reassure the child that: <ul style="list-style-type: none">• They have done the right thing by voicing their concern• What has happened is not their fault, and validate their feelings• Their concern is taken seriously• They are believed.
Respect	Respect the child and ensure that you: <ul style="list-style-type: none">• Allow the child to take their time to disclose further information• Explain what the next steps will be (using age-appropriate language)• Avoid making promises that cannot be kept, e.g. that you will not tell anyone what they have just told you• Ask the child what kind of support they would like from you or WGC• Explain that you may need to tell someone else to keep them safe.

5.3 Responding to Adult-Initiated Complaints

When responding to an adult making a complaint on behalf of a child who is present, WGC should follow the **LISTEN**, **REASSURE**, and **RESPECT** process outlined in Table 2 above.

If the affected child is **not present** at the time an adult-initiated complaint is made, the following factors should be identified:

- Whether the child is aware that the complaint has been raised on their behalf

- The nature of any communication between the complainant and the affected child
- How involved the affected child would like to be in the complaints process
- When to contact the child or their parent/guardian
- How much information to provide the child about the next steps
- The extent of the parent/guardian's involvement in the complaints process.

5.4 Reporting Child Safety Complaints

To report a child safety concern or complaint, personnel should address the requirements outlined in the **Child Safe Complaints Flowchart** and supporting procedure provided in **Appendix A**.

5.5 Investigate

If the matter was reported to external authorities, the Child Safeguarding and Wellbeing Manager will communicate with the relevant external authorities (*i.e. the police or child protection authorities*) prior to initiating an internal investigation. This is to ensure WGC's internal investigation does not compromise any criminal or child protection investigations.

The Child Safeguarding and Wellbeing Manager is responsible for initiating WGC's internal investigation process (*in consultation with the Director or Operations Manager*). As appropriate, the following factors may be addressed and adhered to throughout an investigation:

- Immediate risks to a child's safety are identified and addressed. Risk mitigation strategies are implemented while an allegation or complaint is being assessed and/or investigated (refer to *Section 5.6*).
- Assistance and co-operation with police and child protection authorities is provided, as required
- Principles of procedural fairness are applied
- Any affected child is offered continuous support from WGC, including having access to a support person at all times
- The respondent is provided opportunity to respond to allegations within a reasonable timeframe
- All information and evidence collected is managed securely, with access only by persons approved by the Child Safeguarding and Wellbeing Manager, Operations Manager, and Director
- Affected parties are kept informed throughout each stage of the complaints process.
- The investigation process, findings and outcome are documented clearly in an investigation report.

Note: *If the complaint involves allegations of Prohibited Conduct under the GA Safeguarding Children and Young People Policy ('the Policy'), then the Child Safeguarding and Wellbeing Manager will submit the complaint to GA or SIA. If GA/SIA determines the complaint to be within the scope under the Policy, then SIA*

may manage the complaint in accordance with the GA Complaints, Disputes and Discipline Policy. WGC will liaise and co-operate with GA and SIA in this regard.

5.6 Risk Evaluation and Safety Measures

The Child Safeguarding and Wellbeing Manager (*in consultation with a subset of the Risk Committee*) will assess the risk posed by the respondent to children at the relevant WGC facility. Following this assessment, the Child Safeguarding and Wellbeing Manager and a subset of the Risk Committee will identify and implement appropriate measures to ensure the safety of children. These actions may include, but are not limited to:

- Removal and/or ban of the alleged perpetrator from WGC facilities
- Restrictions against an individual, e.g. removal of a staff member from child-related work
- Disciplinary action (*as outlined in Section 5.7*)
- Continuous monitoring and support for the affected child
- Delivery of further training to WGC staff and/or other personnel.

5.7 Disciplinary Action

Once reporting obligations have been met, WGC may take disciplinary action against the respondent.

If the respondent is a staff member, WGC may:

- Provide additional education, professional development or courses.
- Increase supervision of the staff member
- Remove, suspend or ban the staff member from WGC premises
- Suspend or terminate the staff member's employment with WGC.

Further guidance on disciplinary measures applicable to staff is provided in WGC's Employee Handbook at Section 13: Disciplinary Procedure.

- If the respondent is a spectator (e.g. a parent), another child, or other person associated with WGC, the individual may be immediately removed from the WGC facility or a temporary or permanent ban from WGC facilities will be imposed.
- If the respondent is not a staff member, but is for example, a contractor or sub-contractor, WGC will take appropriate disciplinary action in accordance with the particular circumstances.

5.8 Debrief

The Child Safeguarding and Wellbeing Manager will debrief affected parties on the outcome and reasons for the decision at the conclusion of the complaints process. In all circumstances, the Child Safeguarding and Wellbeing Manager will document all communications with the affected parties and ensure accurate records are kept.

The complainant:

- Follow up with the affected child and/or their family and inform them of the final outcome and resolution

- If appropriate, connect the child and/or their family with support services (see *Section 7.3*).

The respondent:

- Inform them of the final outcome and resolution
- Provide options of internal / external review of the outcome if the respondent is not satisfied with the outcome or handling of the complaint
- Provide referrals to external agencies for additional and ongoing support such as counselling services (if required).

WGC staff:

- If appropriate, debrief affected staff and offer counselling services
- Debrief relevant staff with appropriate information, in accordance with privacy and confidentiality requirements.

External Parties:

- If reported to SIA, WGC will share relevant documentation relating to the allegations and communicate the outcome of the internal investigation to GA's Integrity Team.
- WGC may also be required to communicate with the police or child protection authorities regarding the investigation and outcome of the complaint.

5.9 Support and Protection for Affected Parties

The Child Safeguarding and Wellbeing Manager is responsible for:

- Keeping the parents of the affected child informed of the progress and actions taken throughout a complaint process (the affected child will also be informed where appropriate). If the matter was reported, the Child Safeguarding and Wellbeing Manager will contact the relevant authority (police or child protection authorities) to determine what information may be shared with the affected child's parents, which may include:
 - Not to contact the parents in circumstances where they are alleged to have engaged in the abuse
 - To contact the parents and provide agreed information as soon as possible.
- Providing ongoing support to a child, or any other person who makes a complaint. The Child Safeguarding and Wellbeing Manager will provide support that is within the scope of their role, such as assistance with the reporting process. It may be appropriate to arrange referrals to external support services such as professional counselling (refer to *Section 7.3*).

6 Complaints Review and Analysis

WGC conducts a thorough review and analysis following a child safety complaint. This is to identify the cause of a problem that may have given rise to the complaint, any systemic issues, organisational risks and whether any improvements are required to WGC's policies and procedures.

The review is conducted by the Child Safeguarding and Wellbeing Manager in consultation with the Risk Committee. WGC ensures accurate documents are kept regarding the complaints review, findings and any improvements made to WGC's systems or practice.

Refer to **Appendix E: Complaints Review and Analysis Guidance**.

7 Additional Considerations

7.1 Confidentiality and Privacy

WGC keeps information relating to complaints confidential, to the extent permitted by law. All personal information obtained throughout the complaints process is recorded, stored, and managed in accordance with relevant privacy laws. Refer to WGC's *Child Safety and Wellbeing Policy* for further guidance on confidentiality and privacy.

7.2 Record Keeping

Complaint records are maintained in an indexed, logical and secure manner. WGC keeps complete and accurate records of all serious child abuse matters for a period of **40 years**. All other documents are aimed to be retained for a minimum of **7 years**.

Refer to WGC's *Child Safety and Wellbeing Policy* for further guidance on record keeping practices.

7.3 Referral and Support

WGC will continue to provide appropriate support and assistance to any affected child and their family throughout a complaints process. WGC may consider that the child and/or their family would benefit from a referral to an external support and/or counselling service. If so, WGC will discuss options with the child and/or their family.

Table 3: Referral and Support Services

Kids Helpline	Free 24/7, support and advice for children and young people aged 5 to 25.	1800 55 1800
Lifeline	Provides all Australians access to crisis support and suicide prevention services.	13 11 14
1800 RESPECT	Support if you, or someone you know, is experiencing sexual assault or domestic and family violence (all ages).	1800 737 732
Parentline Victoria	Free telephone counselling and support for parents and carers with children aged 0 – 18 who live in Victoria.	13 22 89

Victorian Aboriginal Child Care Agency	Statewide support service for Aboriginal children and families	(03) 9287 8800
Yarning Safe N Strong	Free and confidential counselling and support service for Aboriginal and Torres Strait Islander Peoples.	1800 959 563
Safe Steps	Victoria's 24/7 family violence response centre for confidential crisis support, information, and accommodation.	1800 015 188

8 Review

This Procedure is reviewed by the Child Safeguarding and Wellbeing Manager (with support from the Director) annually, or earlier as required in accordance with legislative and/or regulatory updates. Any significant changes or significant amendments that could alter the interpretation of this Policy are to be reviewed and approved by the Committee.

9 Related Policies and Procedures

Related policies and procedures listed below are documents directly related to, or referenced in, this Procedure:

[Child Safety and Wellbeing Policy](#)

[Child Safe Code of Conduct](#)

[Employee Handbook – Disciplinary Procedure](#)

[Gymnastics Australia Child Safeguarding Children and Young People Policy](#)

[Gymnastics Australia Complaints, Disputes and Discipline Policy](#)

- *Risk Management Framework.*

10 Relevant Legislation

[Child Wellbeing and Safety Act 2005 \(Vic\)](#)

[Child Wellbeing and Safety Regulations 2017 \(Vic\)](#)

[Children, Youth and Families Act 2005 \(Vic\)](#)

[Crimes Act 1958 \(Vic\)](#)

[Privacy Act 1988 \(Cth\)](#)

[Wrongs Act 1958 \(Vic\)](#)

11 Version History

Version.	Date Amended	Author	Change Details
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			•

Appendix A - Child Safe Complaints Flowchart

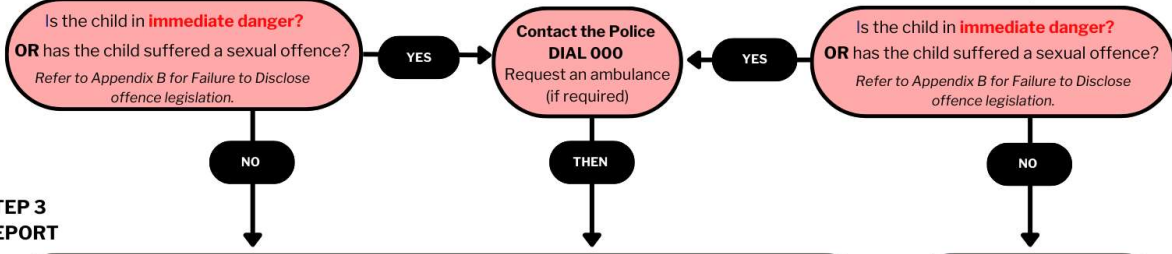
STEP 1

IDENTIFY AND RECEIVE



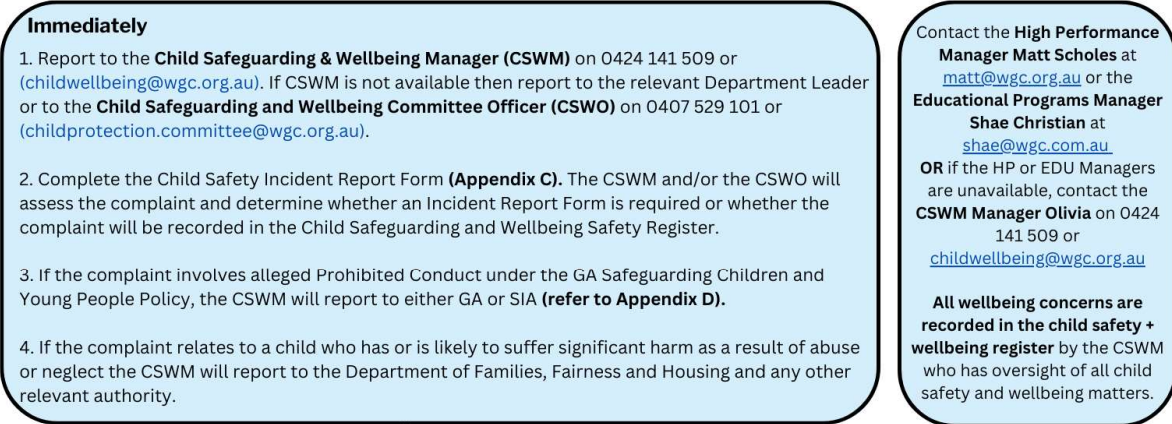
STEP 2

RESPOND



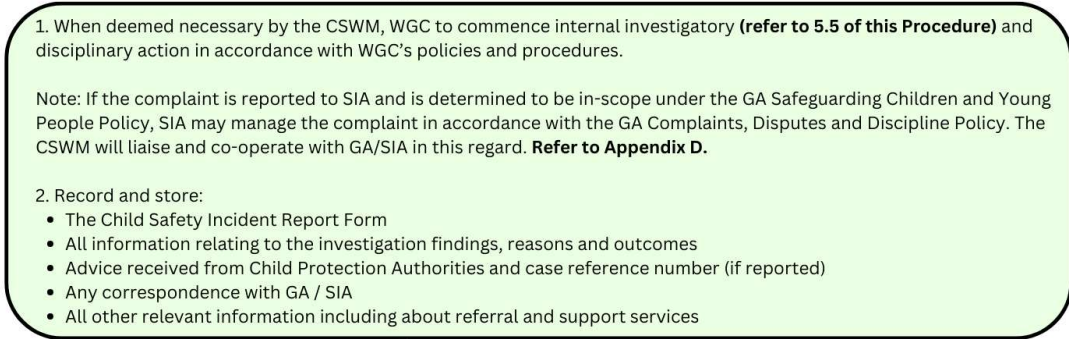
STEP 3

REPORT



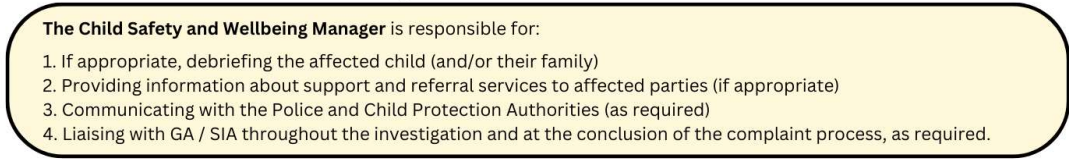
STEP 4

INVESTIGATE AND RECORD



STEP 5

DEBRIEF



Reporting Requirements

Table 4: Reporting Requirements for any child safety concern or complaint made

REPORTING REQUIREMENTS		
1	Contact the Police	<p>Contact the Police on 000 immediately if:</p> <ul style="list-style-type: none"> • A child is in imminent danger or at immediate risk of abuse or harm • A child (under 16 years) has experienced a sexual offence (<i>obligations under the Failure to Disclose Offence, see Appendix B</i>). Staff should contact the Child Safeguarding and Wellbeing Manager (CSWM) if they are unsure of their legal reporting obligations • The complaint involves an allegation or disclosure of any criminal conduct that requires police involvement. <p>For non-emergency related matters, contact the Police on 131 444.</p> <p>Note – The Failure to Disclose offence applies to adult WGC staff (i.e. staff over 18 years). WGC staff (under 18 years) still have an obligation to report any child safety concerns to the CSWM. The CSWM will provide support to all staff members throughout the reporting process.</p>
2	Notify the Child Safeguarding and Wellbeing Manager and/or relevant Department Leader	<p>Regardless of whether the Police were contacted, immediately notify the Child Safeguarding and Wellbeing Manager (CSWM) of the complaint or concern.</p> <p>If the CSWM is not available to a Coach during a session on the gym floor, then Coaches may contact the Child Safeguarding and Wellbeing Committee Officer, or they may report to their relevant Department Leader if they have a child safety concern.</p> <p>Contact details for the Department Leaders are provided below:</p> <p>Squad Program</p> <ul style="list-style-type: none"> • Jessica Mason - High Performance Manager 0412 031 269 (jessica@wgc.org.au) <p>Educational</p> <ul style="list-style-type: none"> • Shae Christian - Educational Manager 0414 751 880 (shae@wgc.org.au) • Sarah Dean - Oakleigh Campus Coordinator (sarah@wgc.org.au) <p>Admin</p> <ul style="list-style-type: none"> • Clare Whittam - Office Manager (clare@wgc.org.au) • Joan O'Connor - Operations Manager (joan@wgc.org.au) • Tanya Hart - CEO 0417 059 536 (tanya@wgc.org.au) <p>For all other concerns defined in the Incident Register, the Department Leader should record the concern and report via email directly to the CSWM prior to the end of their shift. The CSWM must follow up with the Department Leader and the Coach who made the initial report/raised the concern as soon as practicable after becoming aware of the matter.</p>

3	Record the Complaint	<p>The CSWM and/or the CSWO will assess the complaint and determine whether an Incident Report Form is required or whether the complaint will be recorded in the <i>Child and Wellbeing Safety Register</i>.</p> <p>If it is determined the <i>Child Safety Incident Report Form (Appendix C)</i> is required to be completed, it is critical that staff:</p> <ul style="list-style-type: none"> • Gather the child's details and as much relevant information required to record the complaint objectively (including any witness accounts) • Ensure that all available information is recorded as soon after the incident as possible; preferably the same day. <p>Consider whether information should be obtained directly from the child, or whether the parent/guardian should be involved. This may depend on the following factors:</p> <ul style="list-style-type: none"> • The age and maturity of the child • Physical and emotional development of the child • Cultural barriers • Cognitive impairment or communication difficulties • The child's level of understanding on what has happened and the potential consequences. <p>Note: <i>The Child Safeguarding and Wellbeing Manager or the relevant Department Leader may provide support to the staff member (who is making the complaint) if the staff member does not feel comfortable or confident completing the Child Safety Incident Report Form on their own.</i></p> <p>Provide the completed Incident Form to the Child Safeguarding and Wellbeing Manager who will ensure it is recorded in the relevant register (<i>i.e. the Child Safeguarding Register</i>). All records relating to the complaint are kept in accordance with confidentiality and record keeping obligations as outlined in WGC's <i>Child Safety and Wellbeing Policy</i>.</p>
4	Child Protection Authorities	<p>Any person who has a reasonable belief that a child has suffered or is likely to suffer significant harm as a result of abuse or neglect may make a report to the Department of Families, Fairness and Housing (DFFH) - <i>refer to Appendix B</i>. If it is an emergency, where there are urgent concerns for the child's health or life, call the police on 000.</p>
5	Sports Integrity Australia (SIA) and Gymnastics Australia (GA)	<p>If the complaint involves an allegation of Prohibited Conduct i.e. a breach of GA's <i>Safeguarding Children and Young People Policy</i>, the Child Safeguarding and Wellbeing Manager is required to lodge the complaint with GA or SIA (refer to Appendix D).</p> <p>WGC will share relevant information and documentation regarding the allegations of abuse with GA's Integrity Team.</p> <p>Gymnastics Australia's Integrity Team</p> <ul style="list-style-type: none"> • Email: integrity@gymnastics.org.au or phone: (03) 8698 9700 • Raise a Concern Online

Appendix B – Child Safe Legal Obligations in Victoria

1. Voluntary Reporting

A person may make a report to the Department of Families, Fairness and Housing (DFFH) - Child Protection Department, if:

- They have formed a reasonable belief that a child has suffered or is likely to suffer significant harm as a result of abuse or neglect, and
- The child's parent has not protected or is unlikely to protect the child from that type of harm.

Contact Child Protection

To make a report, you should contact child protection at the office that covers the local government area (LGA) where the child normally resides. To make a report during business hours (8.45am to 5pm), Monday to Friday, contact:

- North Division: 1300 598 521
- South Division: 1300 555 526
- East Division: 1300 360 452
- West Division: 1300 360 462

If you are not sure which number to call, check the [Child protection contacts page](#) for details on the LGAs covered by each intake service.

For Immediate Help

To report concerns that are life threatening, contact Victoria Police on 000. To report concerns about the immediate safety of a child after hours, call the **After Hours Child Protection Emergency Service** on **13 12 78**.

2. The Orange Door

If you have a significant concern for the wellbeing of a child, but do not believe they are at risk of significant harm, a referral to The Orange Door may be appropriate. A referral would be appropriate where families:

1. Are experiencing significant parenting problems that may be affecting the child's development
2. Are experiencing family conflict, including family breakdown
3. Are under pressure due to a family member's physical or mental illness, substance abuse, disability or bereavement
4. Are young, isolated or unsupported
5. Are experiencing significant social or economic disadvantage that may adversely impact on a child's care or development.

Contact numbers to make a referral in each local government area are listed on the [Family violence support and extra help for children and families \(orangedoor.vic.gov.au\)](#)

3. Failure to Disclose Sexual Offence Committed Against a Child – *Crimes Act 1958 (Vic) s 327*

An adult commits an offence if:

- The adult has information that leads them to form a reasonable belief;
- That a **sexual offence has been committed against a child** (under 16 years) in Victoria, and
- The adult fails to disclose the information to police as soon as it is practicable to do so, unless the person has a reasonable excuse for not doing so.

A reasonable excuse may include fear for safety or where the information has already been reported. If you **fail to report** the information, you may be charged with a criminal offence. The maximum penalty is three years imprisonment.

4. Failure by a person in authority to protect a child from sexual offence – *Crimes Act 1958 (Vic) s 490*

An adult in child-related work in an organisation, will commit an offence if:

- They know another adult associated with the organisation poses a **substantial risk** of abusing a child (**under 16 years**), and
- They have the power or responsibility to reduce or remove the risk, and
- They negligently fail to do so.

An **adult associated with the organisation** may include, but is not limited to, an officer, employee, manager, owner, volunteer, or contractor.

A person negligently fails to reduce or remove a risk if that failure involves a great falling short of the standard of care that a reasonable person would exercise in the circumstances. The maximum penalty is five years imprisonment.

5. Organisational Liability for Child Abuse – *Wrongs Act 1958 (Vic) s 88*

The duty to prevent applies to organisations that exercise care, supervision, or authority over children. Under the legislation, WGC owes a duty to:

- Take the care that, in all the circumstances of the case, is reasonable to prevent the abuse of a child (under 18 years)

Note: child abuse includes physical abuse or sexual abuse.

- By an individual associated with the organisation
- While the child is under the care, supervision, or authority of the organisation.

An **individual is associated with an organisation** if they are an officer, office holder, employee, volunteer, or contractor of the organisation.

Reasonable precautions vary depending on factors including but not relevant to:

- The nature of the relevant organisation
- The resources that are reasonably available to the relevant organisation
- The relationship between the relevant organisation and the child
- Whether the relevant organisation has delegated the care, supervision, or authority over the child to another organisation
- The role in the organisation of the perpetrator of the abuse.

Appendix C – Child Safety Incident Report Form

- This form is to be used for making a record of all child safety complaints at WGC.
- **If there is an immediate threat to a child or individual’s safety, please contact the police, DIAL 000.**
- This form and any notes must be kept confidential and stored securely in compliance with confidentiality and record keeping guidelines outlined in WGC’s *Child Safety and Wellbeing Policy*
- The Child Safeguarding and Wellbeing Manager will communicate relevant information and share this form with external authorities i.e. police, child protection authorities, SIA and GA, if required.

WGC Child Safety Incident Report Form	
Complainant’s Details	Full Name: Date of Birth: Your gender: Preferred contact number: Email Address:
Classification of Complainant <i>e.g. Parent, Coach, Gymnast, Support personnel, Committee member, spectator etc.</i>	
Is the complainant making the complaint on behalf of a child?	<input type="checkbox"/> No <input type="checkbox"/> Yes, please identify the relationship of the complainant to the child:
Date Complaint received:	
Child’s Details	Name: Age: Address:
Do you or the child identify as being from Aboriginal and Torres Strait Islander background?	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Unknown
Do you or the child have a disability?	<input type="checkbox"/> No <input type="checkbox"/> Yes, please provide relevant details:.....

<p>Do you or the child come from a Culturally and Linguistically Diverse background?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes, please specify.....</p> <p>.....</p> <p>.....</p>
<p>Do you or the child require communication support?</p> <p><i>Communication support may include an interpreter, a support person, family member etc.</i></p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes, please specify.....</p> <p>.....</p> <p>.....</p> <p>If yes, please provide any information relating to the child's preferred communication methods, support needs and involvement in the complaints process:</p>
<p>Category of the Incident</p> <p><i>(you may select more than one if applicable)</i></p>	<p><input type="checkbox"/> Emotional or psychological abuse</p> <p><input type="checkbox"/> Neglect</p> <p><input type="checkbox"/> Sexual Abuse</p> <p><input type="checkbox"/> Grooming</p> <p><input type="checkbox"/> Physical abuse</p> <p><input type="checkbox"/> Exposure to Family or Domestic Violence</p> <p><input type="checkbox"/> Breach of WGC's <i>Child Safety and Wellbeing Policy</i> or <i>Child Safe Code of Conduct</i></p> <p><input type="checkbox"/> Other inappropriate behaviour.</p> <p>Please detail:</p> <p>.....</p> <p>.....</p> <p>Prohibited conduct under GA's <i>Safeguarding Children and Young People Policy</i></p> <p><input type="checkbox"/> Convicted of breaking a child abuse or grooming state/territory or commonwealth law</p> <p><input type="checkbox"/> Misconduct with a child</p> <p><input type="checkbox"/> Request to keep communication a secret</p> <p><input type="checkbox"/> Supplying alcohol drugs or medicines</p> <p><input type="checkbox"/> Failing to comply with child safe practices and recruitment and screening requirements</p> <p><input type="checkbox"/> Committing any act that would constitute prohibited conduct under the Member Protection Policy</p>
<p>Full name of person complained about (Respondent)</p>	

<p>Classification of Respondent</p> <p><i>e.g. Parent, Coach, Gymnast, Support personnel, Committee member, spectator etc.</i></p>	
<p>Date of incident</p>	
<p>Time of incident</p>	
<p>Location of incident</p>	
<p>Witnesses (if any) (if more than 3 witnesses, attach additional details to this form)</p>	<p>Name (1):</p> <p>Contact details:</p> <p>Name (2):</p> <p>Contact details:</p> <p>Name (3):</p> <p>Contact details:</p>
<p>Details of complaint / reason for suspecting abuse</p> <p><i>Use as much detail here as necessary including:</i></p> <ul style="list-style-type: none"> <i>what was said, (where possible, noting the exact words used by the person making the allegation);</i> <i>what you observed (e.g. injury, harm, disclosure) and any other details relevant to the incident.</i> 	
<p>Interim immediate action (if any) taken to ensure child's safety and/or to support needs of person complained about</p> <ul style="list-style-type: none"> <i>Interim action may include transfer of alleged perpetrator to non-child-related duties, suspension, removal</i> 	

<p>Provide details of any harm or injuries to the child, and if the child or others received medical attention.</p>	
<p>Police contacted <i>Complete if relevant</i></p>	<p>Who: <i>name of Police Officer reported to</i> When: <i>date and time you contacted the Police</i> Advice provided: Case reference number (if known):</p>
<p>Department of Families, Fairness, and Housing <i>Complete if relevant</i></p>	<p>Who: <i>name of contact person</i> When: <i>date and time you made contact</i> Advice provided: Case reference number (if known):</p>
<p>Child Safeguarding and Wellbeing Manager or the Child Safeguarding and Wellbeing Committee Officer</p>	<p>Who: <i>name of person reported to</i> When: <i>when did you contact them</i></p>
<p>Completed by</p>	<p>Name: Position: Signature: Date:</p>
<p>Signed by</p>	<p>Complainant name (if it is not a child):</p>

Appendix D – Reporting to Sports Integrity Australia (SIA)

1. SIA Complaints Process

The Complaints Process is a formal process in which SIA handles specific alleged breaches of the National Integrity Framework (*definition provided at Section 3 of this Appendix*).

Gymnastics Australia's (GA) [Safeguarding Children and Young People Policy](#) ('the Policy') forms part of the National Integrity Framework. Accordingly, an alleged breach of the Policy may be submitted as a complaint to SIA.

SIA will evaluate the complaint to determine if it is within SIA's scope to progress further. If so, SIA may decide to investigate the complaint.

2. Submitting a Complaint

A. WGC

WGC will submit all complaints that involve allegations of Prohibited Conduct to SIA (*refer to Section 3: Prohibited Conduct*). If WGC is uncertain as to whether the complaint can be managed by SIA, WGC will contact SIA's Advice Line to seek advice and further guidance.

B. Affected Individuals

An affected individual may submit a complaint directly to SIA. To be eligible to submit a complaint:

- The alleged conduct must have occurred after 4 April 2022 (*the commencement date of which Gymnastics adopted the National Integrity Framework*)
- The matter must relate to a breach of the Policy
- You must be the alleged affected party (or the parent/guardian of the alleged affected party)
- The person accused of the wrongdoing must be bound by the Policy
- You must be willing to provide your contact details. Complaints cannot be submitted anonymously.

SIA's contact details are provided below:

- **Advice Line:** 1300 027 232
- [Make an Integrity Complaint or Report | Sport Integrity Australia](#)

If an affected person is unsure whether their concerns can be managed by SIA, the person can submit a Report and SIA will provide advice on the available options.

3. Prohibited Conduct

Prohibited conduct is outlined below, as prescribed at Clause 4 of the GA [Safeguarding Children and Young People Policy](#).

WGC is required to report all complaints that involve Prohibited Conduct to SIA and/or GA.

A. Terms and Definitions

Table 5: Terms and Definitions

Term	Definition
National Integrity Framework	Means the National Integrity Framework as developed by Sport Integrity Australia and consisting of the following five policies: <ul style="list-style-type: none">• Safeguarding Children and Young People Policy• Competition Manipulation and Sport Gambling Policy• Improper Use of Drugs and Medicine Policy• Member Protection Policy; and• Complaints, Disputes and Discipline Policy.
Person in Position of Authority	Means a person, regardless of age, who through their position or involvement in Gymnastics can exercise power, control, or influence over a child.
Relevant Person	Means an individual member, participant, employee, contractor, volunteer or any other individual who has agreed to be bound by the National Integrity Framework and/or the relevant policies (i.e. any individual engaged by WGC in any capacity, paid or unpaid).
Relevant Organisation	Means Gymnastics Australia, Member Organisations (includes WGC), Authorised Providers, Team or any other organisation that has agreed to be bound by the National Integrity Framework and the Integrity Policies.

B. Relevant Persons

A Relevant Person commits a breach of the Policy when they:

- a) Are found guilty of breaching a Commonwealth or state/territory law relating to child abuse or grooming; or
- b) Engage in any of the following conduct, (in person or online) against, or in relation to, a child:
 - Harmful behaviours towards a child
 - Bullying, Discrimination or Harassment
 - Victimisation or Vilification
 - Request or infer that the child keep any communication secret
 - Supply alcohol, or drugs (including tobacco) to a child
 - Supply medicine to a child, except for:
 - Where the Relevant Person reasonably believes it is necessary for lifesaving medical treatment;
 - When permitted by law; or
 - With parental consent, under a valid prescription and at the prescribed dosage for that child; or

- c) Do not comply with the *Child Safe Practices* as set out in [Annexure B of the Policy](#) which relate to:
- Travel/stays
 - Social media
 - Secret communications
 - Language/tone
 - Discipline/supervision
 - Photo/filming
 - Physical contact
 - Change Rooms.

C. Person in a Position of Authority

In addition to (B), a Person in a Position of Authority commits a breach of the Policy when they engage in any of the following conduct against, or in relation to, a child:

- a) Continue in a child-related position if they have been charged or convicted of a crime that would make them ineligible to be granted a Working with Children Check (WWCC); or
- b) Do not comply with the Child Safe Practices that are applicable to Persons in a Position of Authority as set out in [Annexure B of the Policy](#).

D. Relevant Organisations

A Relevant Organisation commits a breach of the Policy when it:

- a) Engages a person who does not have a WWCC
- b) Does not confirm the validity of a Relevant Person's WWCC currency
- c) Does not undertake screening measures when appointing a person to a child-related position
- d) Does not obtain adequate informed consent from Approved Person/s (i.e. parent/guardian or other authorised family member) prior to transport or overnight accommodation of children
- e) Has knowledge of and does not report a breach of Prohibited Conduct to SIA or GA.

Appendix E – Complaints Review and Analysis Guide

The *Complaints Review and Analysis Guide* outlines key factors to consider when conducting a review following a child safety complaint. The factors in the table below aim to assist in identifying the cause of a problem that may have given rise to a complaint, any systemic issues, organisational risks and whether any improvements are required to policies and procedures.

Table 6: Complaints Review and Analysis guide

Considerations	Comments
<p>Reporting the Complaint</p> <ul style="list-style-type: none"> • <i>How quickly was the complaint lodged following the incident?</i> • <i>Which reporting avenue was used – online, in person etc?</i> 	
<p>Barriers to Making a Complaint</p> <ul style="list-style-type: none"> • <i>Availability of the Child Safety Wellbeing Manager or other relevant staff</i> • <i>Accessibility to incident report form / complaints form</i> • <i>Other barriers such as language/cultural barriers</i> 	
<p>Interim risk mitigation strategies</p> <ul style="list-style-type: none"> • <i>Were any risk mitigation strategies implemented in response to the complaint?</i> • <i>How timely were the measures implemented?</i> • <i>Were the measures effective in mitigating the identified risks?</i> 	
<p>Adherence to WGC’s Child Safe Complaints Handling Procedure</p> <ul style="list-style-type: none"> • <i>Were all steps of the complaints handling procedure adhered to?</i> • <i>Were there any barriers or delays in adhering to each stage of the complaints procedure?</i> 	
<p>Timeliness</p> <ul style="list-style-type: none"> • <i>How quickly did WGC respond to the complaint?</i> • <i>How quickly was the investigation process initiated after receiving the complaint?</i> • <i>What was the duration of the investigation process?</i> 	

<p>Communication and Information Sharing</p> <ul style="list-style-type: none"> • <i>Were affected parties kept informed at key stages throughout the complaints process?</i> • <i>Were confidentiality and privacy requirements adhered to when sharing information with relevant parties?</i> 	
<p>Documentation</p> <ul style="list-style-type: none"> • <i>Were accurate and thorough records of the complaint and the investigation process kept?</i> 	
<p>Procedural Fairness</p> <ul style="list-style-type: none"> • <i>Was the respondent provided:</i> <ul style="list-style-type: none"> ○ <i>An opportunity to respond to the allegations and respond to evidence in a timely manner</i> ○ <i>Right to appeal a decision</i> 	