



AUSTRALIAN FOOTBALL

CODE OF CONDUCT KEEPING OUR CHILDREN AND YOUNG PEOPLE SAFE



KEEPING OUR CHILDREN AND YOUNG PEOPLE SAFE

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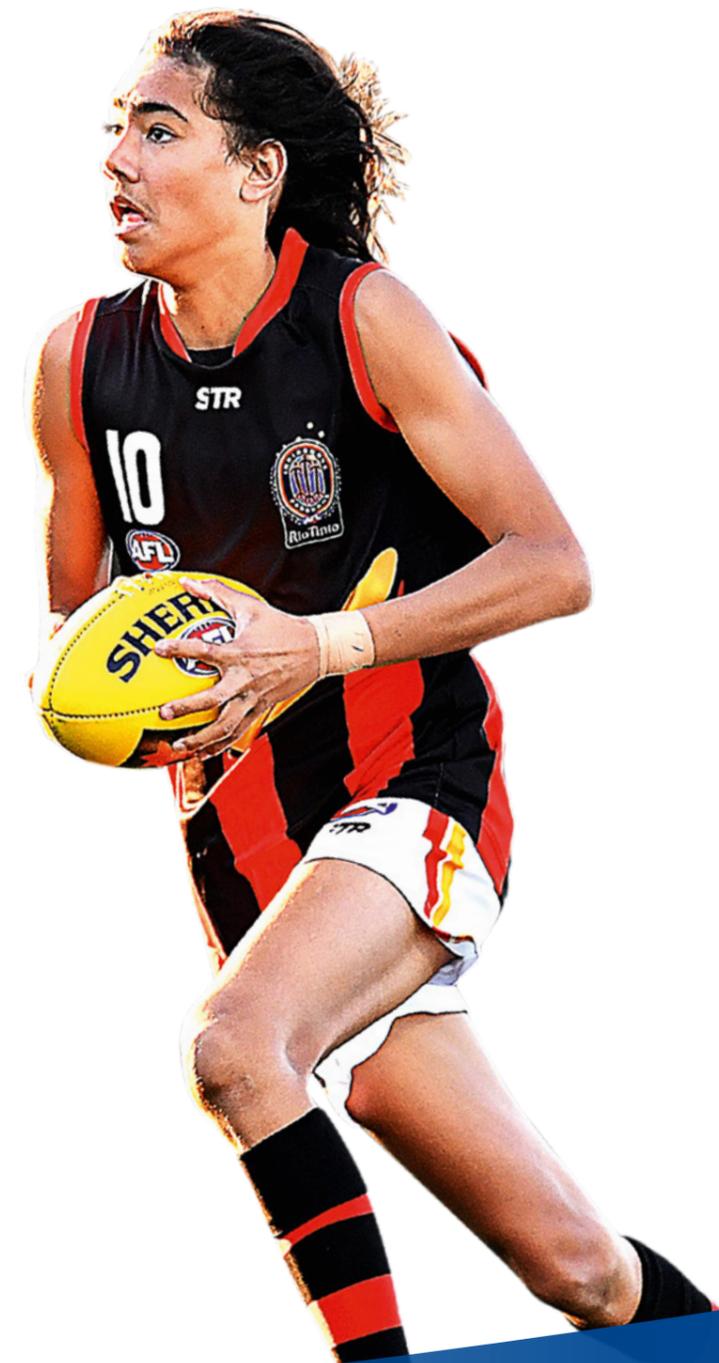
1. PURPOSE

This Safeguarding Children and Young People Code of Conduct (Code of Conduct) sets out the behaviours required of AFL People towards and in the presence of Children and Young People. AFL People are required to abide by the behaviour standards set out in this Code of Conduct (including by complying with appropriate measures to address risks) and report any behaviours that do not comply with it.

Failure by AFL People to comply with this Code of Conduct may result in disciplinary action. Such disciplinary action may, depending on the seriousness of the misconduct, include suspension while matters are investigated and/or dismissal. In addition to any internal disciplinary proceedings, the AFL will report to the police all instances in which a breach of the law has or may have occurred.

There may be exceptional situations where this Code of Conduct does not apply, for example, in an emergency situation. However, it is crucial that, where possible, AFL People seek management authorisation prior to taking action that contravenes this Code of Conduct or advise management as soon possible after any incident in which this Code of Conduct has not been followed.

This Code of Conduct should be read in conjunction with and is supported by the AFL's Commitment Statement to Safeguarding Children and Young People (approved by the AFL Commission), Safeguarding Children and Young People Policy (Policy) and Safeguarding Children and Young People Complaints and Reporting Procedure. Capitalised words in this Code of Conduct have the meaning as set out in the Policy.



2. KEY REQUIREMENTS

This Code of Conduct addresses the major areas where interaction occurs with the Children and Young People who take part in any AFL activities, programs, services or facilities. This Code of Conduct also imposes an obligation on AFL People who organise such activities, programs, services or facilities to identify where risks to safeguarding of Children and Young People may arise and adopt control measures to properly manage those risks (see further at section 3) of this Code of Conduct.

A. Sexual Misconduct

Under no circumstances is any form of 'sexual behaviour' to occur with, or in the presence of, Children or Young People participating in any AFL activities, programs, services or facilities. Engaging in sexual behavior, either by AFL People involved in the delivery of such activities, programs, services or facilities, or persons participating in such activities (whether they be Children or Young People or older), is prohibited, even if the young person(s) involved may be above the legal age of consent.

'Sexual behaviour' needs to be interpreted widely, and encompasses all actions that would reasonably be considered sexual in nature, including but not limited to:

- ♦ 'contact behaviour', such as sexual intercourse, kissing, fondling, sexual penetration or exploiting a child through prostitution; and
- ♦ 'non-contact behaviour', such as flirting, sexual innuendo, inappropriate text messaging, inappropriate photography or exposure to pornography or nudity.

B. Grooming

- ♦ Although Children and Young People can be vulnerable to all types of abuse in sport, the sporting sector needs to be particularly aware of the potential for Grooming of Children and Young People in and around sporting activities. Grooming includes behaviours used to prepare a Child or Young Person with the intention of sexually abusing them. Some common Grooming strategies described in past sporting abuse cases (as reported to the Royal Commission into Institutional Responses to Child Sexual Abuse) include:
 - ♦ coaching relationships – perpetrators can exploit their power and authority over Children and Young People through the private and exclusive coach or instructor relationship;
 - ♦ inappropriate activity and adult material – many survivors of child sexual abuse in sport and recreation settings report that alcohol and other enticements were used by perpetrators as a form of Grooming;
 - ♦ erosion of interpersonal boundaries – coaches can shift the interpersonal boundaries from the acceptable, for example, legitimate touching to correct a technique, to the inappropriate;
 - ♦ targeting vulnerability – research indicates that young athletes who are experiencing difficulties in their home life can be particular targets for perpetrators. Many survivors describe family conflict, family violence or family break-up at the time of the abuse.

Perpetrators will seek to build a trusting relationship with a Child, Young Person and/or their family and/or act to isolate the Child or Young Person to abuse them.

- ♦ AFL People are strictly prohibited from engaging in any conduct that may reasonably be considered to be of the nature of Grooming or in any way exploitative of the power imbalance that may exist in relationships with Children and Young People.

C. Positive Guidance

The AFL strives to ensure that Children and Young People participating in any AFL activities, programs, services or facilities are aware of the acceptable limits of their behaviour so that we can provide a positive experience for all participants.

Wherever possible, Children and Young People are encouraged to 'have a say' and participate in all relevant organisational activities and decision making in relation to those activities, especially on issues that are important to them. Children and Young People are to be given access to relevant information to assist them in their involvement, including about the AFL's safeguarding approach.

However, there are times when AFL People may be required to use appropriate techniques and behaviour management strategies, to discourage, prevent or discipline particular behaviour, to ensure:

- ♦ an effective and positive environment; and
- ♦ the safety and/or wellbeing of Children and Young People or AFL People.

AFL People are required to use behavior management strategies that are fair, respectful and appropriate to the developmental stage of the Children or Young People involved. The Child or Young Person needs to be provided with clear directions and given an opportunity to redirect any misbehaviour in a positive manner.

Under no circumstances are AFL People to take disciplinary action involving physical punishment or any form of treatment that could reasonably be considered as degrading, cruel, frightening or humiliating. Please refer to section 2(l) of this Code of Conduct for further information on when an AFL Person may make physical contact with a Child or Young Person when carrying out a behaviour management strategy.

D. Promoting equity and diversity

All AFL People must ensure that their approach and interactions with Children and Young People are sensitive, respectful and inclusive of all backgrounds and abilities. In particular, AFL People are expected to:

- ♦ promote the cultural safety, participation and empowerment of Indigenous (Aboriginal and Torres Strait Islander) Children and Young People (for example, by never questioning an indigenous child's self-identification);
- ♦ promote the cultural safety, participation and empowerment of Children and Young People with culturally and/or linguistically diverse backgrounds (for example, by having a zero tolerance of discrimination); and
- ♦ promote the safety, participation and empowerment of Children and Young People with a disability (for example, during personal care activities).

E. Adhering to professional role boundaries

Interactions between AFL People and Children and Young People should be limited to interactions directly associated with the AFL activities, programs, services or facilities and AFL People should not act outside the confines of their duties (as specified in their position description, the activity description or similar documents formulated in advance).



Without express authorisation from a nominated AFL manager or person in authority, all AFL People should not:

- ♦ provide unauthorised transportation, for example, giving Children or Young People lifts in their car to an activity without consent from a parent or guardian (see section 2(p) below);
- ♦ engage in activities with Children or Young People who are participants in or members of our programs or organisation outside AFL activities, programs or services;
- ♦ provide support to a Child or Young Person, or their family, unrelated to AFL activities, programs or services; for example, tutoring or financial support;
- ♦ seek contact with Children or Young People (or former participants) outside AFL programs, activities or services, including through social media;

- ♦ where there is no existing social, personal or family relationship prior to engaging in AFL services, accept an invitation to attend any private social function at the request of a Child or Young Person who has participated, or is participating, in any AFL program, activity or service – or at the request of their family (for example, graduation ceremony);
- ♦ develop any 'special' relationships with Children or Young People that could be seen as favouritism, such as the offering of gifts, special treatment or singling specific Children or Young People out, or being secretive with relationships; or
- ♦ engage in open discussions of a mature or adult nature with or in the presence of Children or Young People.

If an AFL Person's position description or similar document does not expressly grant that AFL Person the right to do any of the above, such authorization may not be inferred and instead the AFL Person must seek express authorisation from their AFL manager or person in authority to do any of the above.

Any AFL Person that becomes aware of a situation in which a Child or Young Person requires assistance that is beyond the confines of that person's role, or beyond the scope of usual services, they should at the earliest opportunity:

- ♦ contact the Child or Young Person's parent or guardian to discuss, and/or
- ♦ seek advice from their nominated AFL manager or person in authority.

F. Uniform

AFL People should only wear AFL uniform (where uniform has been provided) or use any AFL accreditation, pass or badge while involved in delivering a service associated with the AFL or as required by the AFL, such as when representing the AFL at designated functions, or travelling to and from work.

G. Use of language and tone of voice

AFL People should use language and tone of voice in the presence of Children and Young People that:

- ♦ provides clear direction, boosts their confidence and encourages and affirms them;
- ♦ is not harmful to Children or Young People;
- ♦ does not include language that is:
 - discriminatory, racist or sexist;
 - derogatory, belittling or negative, for example, by calling a child a 'loser' or telling them they are 'too fat';
 - intended to threaten or frighten; or
 - profane or sexual in nature.



H. Supervision

AFL People are responsible for supervising Children and Young People participating in an AFL program, activity or service to ensure those participants:

- ♦ engage positively with our program or activity;
- ♦ behave appropriately toward one another; and
- ♦ are in a safe environment and are protected from external threats.

AFL People are required to avoid one-to-one unsupervised situations with Children and Young People participating in an AFL program, activity or service and, to the extent possible, conduct all activities and/or discussions with Children or Young People in view of other adults.

I. Use of electronic and online communications

Where possible, all email, text messages and other forms of messages sent to a Child or Young Person should be copied to their parent or guardian.

Where a parent is not included in a communication between an AFL Person and a Child or Young Person, the AFL Person must:

- ♦ restrict such communication to issues directly associated with delivering the AFL program, activity or service, such as advising that a scheduled event is cancelled;
- ♦ limit the personal or social content in such communication to what is required to convey the service-related message in a polite, friendly manner. In particular, the communication must not contain anything that a reasonable

observer could view as being of a suggestive or sexual nature;

- ♦ not request (or accept a request) to be "friends", "follow" or communicate with Children or Young People using a personal social media account including, but not limited to, Facebook, Instagram, Twitter, Snapchat, Internet chat rooms or similar forums, game sites or instant messaging;
- ♦ not use such communication to promote unauthorised 'social' activity or to arrange unauthorised contact; and
- ♦ not request a Child or Young Person to keep a communication a secret from their parent or guardian, nor keep the communication a secret from the AFL Person's nominated manager or person in authority.



All AFL People are required to adhere to the AFL Social Media Engagement Policy, found at bit.ly/AFLSocialMediaPolicy

AFL People are required to report to AFL management if they become aware of any Children or Young People who may have been placed at risk of abuse or exploitation via social networking sites, gaming sites or through web searches, or inappropriate email communication.

J. Giving gifts

AFL People may only give a gift to a Child or Young Person engaged in an AFL program, activity or service when:

- ♦ the AFL Person's supervisor or manager has provided their consent being satisfied that the giving of the gift is appropriate and proportionate in the circumstances; and
- ♦ parents/guardians are made aware of any gift given.

K. Photographs or filming of children and young people

Subject to any applicable terms of entry of a venue, under this Code of Conduct:

- ♦ Children and Young People are to be photographed or filmed while involved in an AFL program, activity or service only if:
 - written consent is obtained from the Child's or Young Person's parent or guardian;
 - the context is directly related to participation in the program, activity or service;
 - the Child or Young Person is appropriately dressed and posed; and
 - the image is taken in the presence of other AFL People where possible.
- ♦ If a Child or Young Person does not wish to be photographed or filmed or a Child's or Young Person's parent or guardian has not provided permission for the Child or Young Person to be photographed or filmed, the Child or Young Person is not to be singled out or made to feel purposely excluded.
- ♦ Images are not to be distributed (including as an attachment to an email) to anyone other than the Child or Young Person photographed without AFL management's knowledge and approval.

- ♦ Photographs and films are not to be taken in the presence of or whilst Children or Young People are getting dressed.
- ♦ Images are to be stored in a manner that prevents unauthorised access.

AFL People must comply with the AFL's Privacy Policy (available at www.afl.com.au/privacy) in relation to holding and disclosing images and any other personal information. In particular, AFL People should inform a Child's or Young Person's parent or guardian about the nature of the use of the image(s) as well as how the image(s) will be stored and how the image(s) can be accessed by the parent or guardian.



L. Physical contact with Children and Young People

Any physical contact with Children and Young People must be appropriate to the delivery of the program, activity or service, such as assisting with skill learning, and based on the needs of the Child or Young Person.

Under no circumstances should any AFL People have contact with Children or Young People participating in our program or activity that:

- ♦ involves touching of:
 - genitals;
 - buttocks; or
 - the breast area,
 other than as part of delivering medical or allied health services by a medical professional;
- ♦ would appear to a reasonable observer to have a sexual connotation;
- ♦ is intended to cause pain or distress to the Child or Young Person (e.g. physical punishment);
- ♦ is overly physical (e.g. wrestling, horseplay, tickling or other roughhousing);
- ♦ is unnecessary (e.g. assisting with toileting when a child does not require assistance);
- ♦ is initiated against the wishes of the Child or Young Person, except if such contact may be necessary to prevent injury to the Child or Young Person or to others, in which case:
 - physical restraint should be a last resort;

- the level of force used must be appropriate to the specific circumstances, and aimed solely at restraining the Child or Young Person to prevent harm to themselves or others; and
- the incident must be reported to AFL management and the Child or Young Person's parent or guardian as soon as possible.

All AFL People are required to report to AFL management as soon as possible any physical contact initiated by a Child or Young Person (whether directed to another Child or Young Person, to an AFL Person or any other person) that is sexual and/or inappropriate, for example, acts of physical aggression, to enable the situation to be managed in the interests of the safety of the Child or Young Person, AFL People and any other participants.

M. Overnight stays and sleeping arrangements

Overnight stays are to occur only within or part of a formal program, activity or service. Written authorisation of the parent or guardian of each Child and Young Person involved must be obtained including medical forms.

Practices and behaviour by all AFL People during an overnight stay with Children and Young People must be consistent with the practices and behaviour expected during delivery of AFL programs, activities or services at all other times.

Standards of conduct that must be observed by AFL people during an overnight stay include:

- ♦ minimum of two adults on any overnight stay with Children or Young People present. If an exemption is required, written permission from AFL senior management and each parent or guardian must be obtained in advance;
- ♦ providing Children and Young People with privacy when bathing and dressing;
- ♦ observing appropriate dress standards when Children and Young People are present (e.g. no exposure to adult nudity);
- ♦ not allowing Children or Young People to be exposed to pornographic material (e.g. through movies, television, the Internet or magazines);
- ♦ not leaving Children or Young People under the supervision or protection of other Children or Young People or unauthorised persons such as hotel staff or friends;
- ♦ not allowing sleeping arrangements that may compromise the safety of Children and Young People such as unsupervised sleeping arrangements, or an adult sleeping in the same bed as a Child or Young Person;
- ♦ the exercisable right of Children and Young People to contact their parents, guardians or others if they feel unsafe, uncomfortable or distressed during the stay; and



- ♦ ensuring an appropriate gender balance of adult supervisors is present if male and female Children and Young People are participating in the overnight stay (e.g. female supervisors available if female Children or Young People involved and vice versa).

N. Change room arrangements

AFL People are required to supervise Children and Young People in change rooms while balancing that requirement with a Child or Young Person's right to privacy. In addition:

- ♦ AFL People should avoid one-to-one situations with a Child or Young Person in a change room area;
- ♦ AFL People should avoid being present in a change room area with a Child or Young Person of the opposite sex whilst they are changing;
- ♦ AFL People are not permitted to use the change room area to undress or dress, while Children and Young People are present;

- ♦ AFL People need to ensure adequate supervision in 'public' change rooms when they are used, providing the level of supervision required for preventing abuse by members of the public, adult users, or general misbehaviour, while also respecting a Child's or Young Person's privacy; and
- ♦ phones, cameras and recording devices are not to be used in changing rooms and in particular whilst Children and Young People are getting dressed.

Whilst supervising Children or Young People, AFL People must not:

- ♦ use, possess or be under the influence of an illegal drug;
- ♦ use or be under the influence of alcohol;
- ♦ be incapacitated by any other legal drug such as prescription or over-the-counter drugs; or
- ♦ supply alcohol or drugs (including tobacco) to Children or Young People.

Use of legal drugs, other than alcohol, is permitted, provided such use does not interfere with the AFL Person's ability to care for Children and Young People involved in our sport.

O. Transporting children

The AFL acknowledges that from time to time there are valid reasons for transporting Children and Young People. Children and Young People are to be transported only:

- ♦ in circumstances that are directly related to the delivery of an AFL program, activity or service; and
- ♦ with prior authorisation from management and from the Child or Young Person's parent or guardian.

It is recommended the Child or Young Person being transported sits in the back seat of the car and expected timelines of travel are to be communicated to the parent or guardian and management.



3. RISK MANAGEMENT

An AFL Safeguarding Children and Young People Risk Assessment (Risk Assessment) must be undertaken in advance of the provision of any AFL activities, programs or services involving Children or Young People.

The Risk Assessment must identify potential risks to the safety of Children and Young People and the proposed control measures to be adopted to manage those risks. The Risk Assessment must be prepared in consultation with the AFL Insurance & Risk Department and submitted for approval to the Child Safety Coordinator in advance of the relevant activity, program or service being undertaken.

The form of the Risk Assessment is contained at Appendix 1. The AFL Safeguarding Children and Young People Risk Assessment Identification Guide at Appendix 2 should be used to assist in the identification of relevant risks. Training will be provided to the relevant AFL People in relation to the preparation of Risk Assessments.

For ongoing AFL activities, programs and services, an approved Risk Assessment may be used on the recurrence of such AFL activities, programs and services so long as it is periodically reviewed at least annually or more frequently when any substantive change occurs.

4. REPORTING OBLIGATIONS

AFL People are required to immediately report:

- ♦ any instance of any AFL People breaching this Code of Conduct; and
- ♦ any instances, allegations or disclosures of Child Abuse or other inappropriate conduct such as Grooming or Bullying that they become aware of, or any concerns that they develop in relation to these matters (whether by a source internal or external to the AFL, including a family member or guardian of the child).

Reports must be submitted in accordance with the AFL Safeguarding Children and Young People Complaints and Reporting Procedure available at www.afl.com.au/policies

5. COMMUNICATE

The AFL communicates this Code of Conduct to all AFL People.

The AFL involves AFL People in reviews of this Code of Conduct, and communicates any significant alterations of this Code of Conduct to AFL People.



6. MONITORING AND REVIEW

This Code of Conduct will be reviewed annually, after consultation. Some circumstances may trigger an early review, which includes but is not limited to legislative changes, organisational changes, incident outcomes and other matters deemed appropriate by the AFL Executive.

The AFL will retain records to document each review undertaken. Records may include minutes of meetings and documentation of changes to policies and procedures that result from a review.





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