

Child Safe Code of Conduct and Reporting Procedure

Commitment to child safety

At NFL ANZ, we are committed to supporting the safety of all participants, with a zero-tolerance approach to abuse. This includes a culture where preventing and reporting abuse is encouraged and supported.

All workers, including volunteers are responsible for promoting the safety, wellbeing and empowerment of participants in NFL ANZ's programs, activities and events. This includes understanding and responding to participant's diverse needs and cultural considerations.

Our Child Safe Code of Conduct & Reporting Procedure sets out how we expect adults in our organisation to behave around participants to help prevent harm and abuse in our physical spaces and online and sets out our policy on child safe reporting and complaints handling.

Our Child Safe Code of Conduct identifies:

- **'I will'** - child safe behaviours that we consider acceptable; and
- **'I won't'** - behaviours that we consider unacceptable.

Engaging in unacceptable behaviour is a breach of our Child Safe Code of Conduct and may result in disciplinary action.

Different types of child harm and abuse

Child abuse takes many forms. It can include psychological, physical and sexual abuse, grooming, misconduct and lack of appropriate care as defined below.

Psychological abuse (also known as emotional abuse)

This includes bullying, threatening and abusive language, intimidation, shaming and name calling, ignoring and isolating a child, and exposure to domestic and family violence.

Physical abuse

This includes physical punishment, such as pushing, shoving, punching, slapping and kicking, resulting in injury, burns, choking or bruising.

Sexual abuse

This includes the sexual touching of a child, grooming, and production, distribution or possession of child abuse material.

Grooming

This is a process where a person manipulates a child or group of children and sometimes those looking after them, including parents, carers, teachers and leaders. They do this to establish a position of 'trust' so they can then later sexually abuse the child.

Misconduct

This is inappropriate behaviour that may not be as severe as abuse, but could indicate that abuse is occurring and would often be in breach of an organisation's Child Safe Code of Conduct. This could include showing a child something inappropriate on a phone, having inappropriate conversations with a

child or an adult sitting with a child on their lap.

Lack of appropriate care

This includes not providing adequate and proper supervision, nourishment, clothing, shelter, education or medical care.

Acceptable and unacceptable behaviours in our organisation

The list of acceptable and unacceptable behaviours below are in relation to interactions of workers, including volunteers, with participants who interact with NFL ANZ's programs, events or activities.

I will:

- treat all participants with respect
- uphold the rights of the participant and always prioritise their needs
- make sure the needs of all participants remain the paramount focus of any decision-making
- listen to and value the ideas and opinions of all participants, and respond to them appropriately
- welcome all participants and their families and carers, and ask them to participate in decisions around child safety
- actively promote safe and inclusive practices for all participants, including those with diverse needs, circumstances and backgrounds, including children with disability
- adhere to the organisation's child safe policies, procedures and practices
- participate in all compulsory child safe training
- include a participant's parent or carer in any direct online communication or correspondence.
- when transporting a participant at work, take all reasonable steps to ensure at least two adults are travelling with the participant at all times or put in place a suitable arrangement between NFL ANZ and the parents or carers of the participant. If the child is alone, they must sit in the back seat of the vehicle
- let NFL ANZ know about any out-of-hours contact with any participant in NFL ANZ's programs, events or activities, and make sure there is a valid reason for this contact and parents or carers are also aware of this contact
- take all reasonable steps to protect participants from harm and abuse, and report and act on any concerns or allegations (see reporting obligations below)
- report any conflicts of interest such as a relationship with a participant that is outside of NFL ANZ
- raise concerns with the leadership team if risks to child safety are identified
- take a participant seriously if they disclose harm or abuse and follow the correct procedures for responding to a disclosure
- make sure breaches of the Child Safe Code of Conduct and any instances of concerning behaviour from adults are reported immediately
- respect the privacy of participants, and their families, and keep all information about child protection concerns confidential.

I won't:

- condone or participate in unsafe, harmful or abusive behaviour towards participants, including psychological, physical and sexual abuse, grooming, misconduct or lack of appropriate care
- ignore or disregard any concerns, suspicions or disclosures of child abuse
- exaggerate or trivialise child abuse issues
- persistently criticise or denigrate a participant
- use hurtful, discriminatory or offensive behaviour or language with participants
- verbally assault a participant, or create a climate of fear
- deliberately prevent a participant from forming friendships
- engage in unwarranted and inappropriate touching involving a participant
- be alone with a participant without supervision or adequate risk management in place

- have contact after hours with participants
- encourage a participant to communicate with me in a private setting, including online or on social media
- give personal gifts or benefits of any kind to a participant unless direct permission has been given from the parent or carer
- share details of sexual experiences with a participant
- use sexual language or gestures in the presence of participants
- show sexual, violent or other inappropriate images to a participant
- take videos or images of participants interacting with the organisation or under the care of the organisation on a personal device without permission from the organisation
- share videos or images of participants on social media without consent
- fail to report information to police or other relevant authorities if I know a participant has been harmed or abused (see reporting obligations below).

Concerning behaviours

Concerning behaviours are behaviours that on their own may not constitute a breach of NFL ANZ's Child Safe Code of Conduct but when viewed together may indicate grooming behaviour.

These include:

- Showing favour to one participant over others
- Babysitting participants without prior consent from NFL ANZ (babysitting outside the organisation is only allowed in exceptional circumstances when the participant and their family or carer is known has a pre-existing relationship with the worker outside of NFL ANZ)
- Participating in the lives of participants outside the service without a valid reason
- Crossing professional boundaries with the participants
- Spending time alone with participants
- Being 'child centric', which means showing a preference for hanging out with participants rather than adults.

Internal and external reporting obligations

You must follow all internal and external reporting obligations set out in NFL ANZ's Child Safe Reporting Procedure below.

Criminal offences for not acting to protect children

Some breaches of this Child Safe Code of Conduct may need to be reported to Queensland Police, the Department of Justice, or the Department of Families, Seniors, Disability Services and Child Safety.

It is a criminal offence for adults not to report to police if they know or believe that a child abuse offence has been committed. In addition, people employed in child-related work may be subject to a criminal offence if they fail to reduce or remove the risk of a child becoming a victim of child abuse.

The adult concerned should reach out to Charlotte Offord, General Manager – Australia and New Zealand at Charlotte.offord@nfl.com if they are unsure of what may need to be reported externally.

Penalties for workers, including volunteers, who breach our Child Safe Code of Conduct

Workers, including volunteers who breach our Child Safe Code of Conduct but do not commit a criminal offence may still be subject to disciplinary action. This can include increased supervision, appointment to a different role, additional training, suspension or termination of their engagement with NFL ANZ.

Concerning behaviours

If a worker, including a volunteer, shows patterns of concerning behaviour but does not commit a criminal offence, this may result in increased supervision and/ or additional training. If these behaviours of concern continue, the worker may be subject to disciplinary action, including appointment to a different role, suspension or termination of their engagement with NFL ANZ.

Reporting Procedure

This procedure sets out NFL ANZ's processes for child safe reporting and complaint handling.

Everyone at NFL ANZ must:

- know **what** to report, **who** to report to and **how** to report
- report any concerns about the safety or welfare of a participant immediately
- ensure the safety and wellbeing of the participant is paramount when responding to a disclosure or allegation about a participant being harmed or at risk.

Our reporting practices will be regularly reviewed and updated to make sure they remain effective and comply with legislation.

Types of complaints (what to report)

All complaints should be reported. This includes:

- criminal conduct;
- disclosures or reports of abuse;
- risk of significant harm;
- reportable allegations (an allegation that an employee has engaged in conduct that may be reportable conduct); and
- unacceptable behaviour around participants that breaches our Child Safe Code of Conduct.

Making an external complaint or report

How to make an external complaint/report

Reporting criminal conduct to the police

It is of the utmost importance that allegations of criminal conduct be reported to police at the earliest opportunity and that relevant parties obtain guidance from police before taking any action that could compromise a criminal response.

It is an offence under the Criminal Code Act 1899 (section 229BC (1)(a)) for any adult not to report sexual offending against a child by another adult to police. This means all adults have the responsibility to report sexual offences against children to police – unless they have a “reasonable excuse” not to.

For the purpose of the Criminal Code Act:

- a *child* means a person under 16, or a person under 18 with an “impairment of the mind”;

- a *child sexual offence* is broadly defined and may include conduct such as fondling a child in a sexual manner, having the child touch a sexual body part, taking a sexual photograph of a child, or grooming a child or their parent or carer; and
- *reasonable excuse* includes if you have already reported your concerns to the Department of Families, Seniors Disability Services and Child Safety (**Department**), or you know another adult has or will report it.

Contact Queensland Police for anything you consider could be a criminal offence. This includes sexual assault, physical assault, grooming offences, and producing, disseminating or possessing child abuse material.

Reporting and referring concerns to non-police bodies

If you have concerns for a child or family, you can make a referral to Family and Child Connect, or report your concerns to the Department, depending on the seriousness of your concerns.

You should report your concerns to the Department if you have information to suggest that a child may be in need of protection.

Making an internal complaint or report

Who must make an internal report

Everyone involved with NFL ANZ in any capacity must make an internal report about any child abuse or misconduct concerns they either observe or are told about.

The person making the internal report will not be penalised. A failure to report, or preventing another person from reporting, will be considered misconduct.

How to make an internal report

Internal reporting by employees, contractors and volunteers

Workers, including volunteers, participants, or their families or advocates should make an internal report, including reporting breaches to our Child Safe Code of Conduct & Reporting Procedure by completing our Template for recording complaints and allegations contained at Annexure 1 of this policy, or contacting Charlotte Offord, General Manager - Australia and New Zealand at Charlotte.Offord@nfl.com.

Reporting breaches of our Child Safe Code of Conduct & Reporting Procedure

All breaches and disclosures must be reported to Charlotte Offord, General Manager - Australia and New Zealand.

Child safeguarding officer(s) in our organisation

Charlotte Offord, General Manager - Australia and New Zealand

How complaints should be handled

Overview of the complaint-handling process

Once an allegation or complaint has been made, NFL ANZ will, in its absolute discretion, adopt a process which may include some or all of the following steps to make sure any allegations or complaints are appropriately followed up:

1. steps are taken to identify and address any risks
2. the incident is recorded
3. reporting obligations are met (if any)
4. an investigation is conducted, keeping everyone involved up to date with what is happening
5. ongoing support is offered to the participant as needed
6. the incident is reviewed and NFL ANZ's child safe documents are updated, if necessary. This includes reviewing our Child Safe [Risk Management Plan](#).

Procedural fairness, including privacy and confidentiality

Any allegation of abuse must be treated in a fair, transparent and timely manner, as far as reasonably practicable.

In carrying out its complaints handling procedure, NFL ANZ will comply with the obligations defined under the *Privacy Act 1988* (Cth).

How we publicise and support our Child Safe Reporting Procedure

To make sure everyone in our organisation is aware of our Child Safe Reporting Procedure and their reporting obligations, we:

- create and display important information from our Child Safe Reporting Procedure that describes what to report, who to report to and how to report
- provide staff with training opportunities so they understand processes for complaints and allegations
- create and promote age- and ability-appropriate communications for children that explain what to do if have a concern.

Next review date

This policy will be reviewed annually and after any critical incidents, to make sure our child safe reporting practices are continually improved and that we keep up to date with relevant legislation and sector requirements.

The next review date is 1 December 2026.

Agreement to abide by the terms of Child Safe Code of Conduct & Reporting Procedure

I have read and agree to abide by the terms of this Child Safe Code of Conduct & Reporting Procedure

Name of worker

Role in organisation

Signature and date

X

Date document reviewed

January 2026

Next review date

1 December 2026

If there are any critical incidents, the document will be reviewed immediately.

Signature of responsible officer

X *Charlotte Offord*

Charlotte Offord

Person responsible for policy and compliance

Template for recording complaints and allegations

This form should be used to record a suspicion, allegation or disclosure of child abuse, or a complaint of unacceptable behaviour.

Your name and position	
Name of the child or young person involved	
Name of person making complaint	
Name of person who the complaint was made against	

1. Nature of the complaint: include time, date, location, what happened and who was involved (this can include observations of the child's behaviour).

2. Details of any injuries and if the child received medical attention.

3. Accurately record what the child said when describing what happened – use their exact words – or record why you suspect abuse due to an indirect disclosure, such as a drawing or observed behaviour.

(In the case of an allegation of abuse, formal investigations and interviews will be carried out by the Department and/or Queensland Police. You must record what the child has said but unless it is your role to investigate, you should not interview the child.)

4. Details of anyone who saw what happened.

5. Does this complaint indicate the possibility of child abuse, such as physical abuse, psychological or emotional abuse, sexual abuse or neglect?

Yes No

6. Who did you make a report to?

- Queensland Police
- Family and Child Connect
- The Department
- Internal reporting obligations (name the relevant department or person)
- Other (name them)

7. People spoken to in relation to the matter (describe who was spoken to and why they were spoken to about the matter – include police officers, Department staff and anyone else you spoke to).

Date(s):