



ISA Child Safe Policy and Procedure

1) Purpose

The Independent Sporting Association (ISA) is committed to ensuring that every child and young person participating in ISA activities is safe, empowered, heard and protected from harm. This Policy operationalises ISA’s legal duties in NSW, embeds the NSW Child Safe Standards, and outlines clear procedures for prevention, reporting, responding and continuous improvement.

2) Scope

This Policy applies to all ISA activities, including competitions, trials, training, tours, overnight stays, transport, digital engagement, and any event conducted under ISA auspices. It applies to:

- ISA employed staff
- Officials, coaches, managers, volunteers
- Contractors and third-party providers
- Personnel supplied by Member Schools for ISA activities

Member Schools remain responsible for the conduct, screening, and employment obligations of their staff but must comply with ISA’s safeguarding requirements when participating in ISA activities.

3) Definitions

- Child/Young Person: Under 18 years (NSW).
- ISA Staff / ISA Officials: Employees, coaches, managers, officials, volunteers, contractors.
- ISA Director of Sport: Person with reportable conduct obligations under the Children’s Guardian Act 2019.
- ROSH: Risk of Significant Harm under the Care and Protection Act 1998 (NSW).
- Reportable Conduct: Categories under Children’s Guardian Act 2019, including sexual offences/misconduct, ill-treatment, neglect, assault, significant psychological harm, and Crimes Act s43B/s316A offences.

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4) Legal and Standards Framework

ISA will comply with all applicable NSW and Commonwealth legislation, including:

- Children’s Guardian Act 2019 (NSW) — NSW Child Safe Standards; Reportable Conduct Scheme
- Children and Young Persons (Care and Protection) Act 1998 (NSW) — Mandatory Reporting; Chapter 16A information sharing
- Child Protection (Working with Children) Act 2012 (NSW) — WWCC requirements
- Crimes Act 1900 (NSW) — grooming (s66EB); failure to protect (s43B); failure to report (s316A)
- Privacy and Personal Information Protection Act 1998 (NSW)
- Health Records and Information Privacy Act 2002 (NSW)
- National Principles for Child Safe Organisations (Commonwealth)

ISA acknowledges its obligations as a child-related employer for ISA-employed staff and as a coordinating body for Member School personnel.

5) Our Commitment & the NSW Child Safe Standards

ISA explicitly adopts and implements the 10 NSW Child Safe Standards. ISA’s governance, systems and culture will ensure:

1. Leadership & governance prioritise child safety.
2. Children’s voices shape decisions.
3. Families and communities are informed and involved.
4. Equity and diverse needs are respected.
5. Suitability and support of people working with children.
6. Accessible, child-focused complaints and responses.
7. Ongoing training and capability.
8. Safe physical and online environments.
9. Continuous review and improvement.
10. Documented child-safe policies & procedures.

6) Roles & Responsibilities

- ISA Board:
 - Approves this Policy and ensures adequate resources for implementation.
 - Monitors compliance, risk, and assurance reporting.
 - Promotes a child-safe culture across ISA.

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- The Board Chair is the Head of Relevant Entity for the purposes of the Reportable Conduct Scheme.
- ISA Director of Sport:
 - Leads operational implementation of this policy.
 - Acts as the ISA’s Child Safety Officer
 - Receives and triages concerns, disclosures, and complaints.
 - Coordinates mandatory reporting, risk assessments, and liaison with Member Schools.
 - Supports the ISA Chair in fulfilling statutory obligations.
- Member Schools:
 - Ensure their personnel involved in ISA activities are inducted/trained; verify WWCC; liaise on reports and information sharing.
 - Ensure their staff participating in ISA activities are screened, trained, and compliant with ISA requirements.
 - Conduct WWCC verification for their staff.
 - Share information under Chapter 16A when required.
 - Collaborate with ISA on incident response and risk management.
- ISA Staff / ISA Officials:
 - Comply with this Policy and the ISA Child Safe Code of Conduct.
 - Maintain professional boundaries.
 - Report concerns promptly.
 - Participate in required training.

7) Suitability, Screening & Induction

Working with Children Check (WWCC)

- All persons in ISA child-related work must hold a valid WWCC; the employer (ISA/Member School) must verify status before engagement and maintain records; WWCCs are continuously monitored by OCG. Expiry/non-clearance results in immediate removal from child-related duties.

Recruitment

- Child-safe recruitment (position descriptions, behavioural interviews, reference checks with safeguarding questions) for ISA-employed roles.

Doc I.D ISA – Child Safe	Created On	3/03/2026	Reviewed On	N/A	Next Review	Dec 2026	Prepared By	ISA Director of Sport	Authority	ISA Board	Approval Date	17/03/2026
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Contractors/Third Parties

- All contractors (e.g., bus drivers contracted by ISA, external trainers, photographers) must meet WWCC and code-of-conduct requirements before contact with students.

Induction & Training

- Mandatory induction for all ISA Staff/Officials covering this Policy, ISA Child Safe Code of Conduct, reporting duties, digital safety and environments. Refresher training annually; role-specific training for tour leaders/managers.

8) Professional Boundaries & Code of Conduct

ISA adopts the ISA Child Safe Code of Conduct as the binding standard of behaviour, including:

- Rule of Two (never 1:1 in enclosed/private spaces).
- Appropriate physical contact for coaching/first aid with consent.
- No favouritism, gifts intended to build “special” relationships.
- No private/personal communications or social media contact.
- No alcohol/illicit substances while supervising.
- Documentation of necessary 1:1 interaction.
- Mandatory reporting and cooperation with investigations.

9) Safe Physical Environments

General Supervision

Active supervision, headcounts, venue risk assessments, safe transport arrangements, arrival/departure controls and contingency plans are required for all ISA events.

Change Rooms

Supervision by same-gender staff where practicable; announce before entry; balance safety with privacy; never be alone with a student.

Tours / Overnight Stays

- Written parent/carer consent (behavioural expectations, medical info, itinerary);
- Mixed gender room sharing prohibited.
- Staff avoid being alone with students (emergency exceptions).

If room/bag checks are necessary for safety, they are conducted by two staff, documented, and consistent with parent consent and school policies; Police contacted when criminal risk suspected.

10) Digital Safety & Communications

Communications

- Use school/ISA-approved channels (no private messaging on personal accounts).

Doc I.D ISA – Child Safe	Created On	3/03/2026	Reviewed On	N/A	Next Review	Dec 2026	Prepared By	ISA Director of Sport	Authority	ISA Board	Approval Date	17/03/2026
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- Maintain professional tone; include another adult where feasible; no direct 1:1 private chat.

Images, Filming & Livestreaming

Obtain informed parental/carer consent for identifiable images; apply “no-name with image” wherever feasible; avoid posting location/time details that enable contact; ban imagery in change rooms and private areas.

Online Platforms & Groups

Official team groups must be moderated by staff; no private DMs with students; retain message records where operationally feasible and in line with privacy.

11) Diversity, Inclusion & Participation

The ISA is a child safe and child-centred organisation. Our environment is friendly and welcoming to all children and young people.

- **Children’s Participation:** Students are empowered to express their views on safety and are taken seriously. Age-appropriate information about rights and safety strategies is provided (e.g., pre-tour briefings, access to staff).
- **Families and Communities:** Parents/Caregivers will be fully informed, in writing, of all arrangements (training, match times, transport, supervision) and the ISA's Child Safe Policy and Code of Conduct. Two-way communication is encouraged, and feedback on safety policies is welcomed.
- **Equity and Diversity:** The ISA upholds equity and actively responds to the diverse circumstances and potential vulnerabilities of all children, ensuring environments are free from racism, discrimination, and hate speech. Attention will be paid to the needs of Aboriginal and Torres Strait Islander children, children with disability, and children from culturally and linguistically diverse backgrounds to ensure all have equal access to information, support, and complaints processes.

12) Complaints, Concerns & Disclosures

Immediate Safety First

If a child is in immediate danger, call 000 and implement safety actions.

How to Raise a Concern

Anyone (child, parent, staff, official, spectator) can report to the ISA CSO, any ISA official, or via published form on the ISA website. Children must be informed, in child-friendly ways, how to raise concerns.

Responding to a Disclosure

Stop and listen; don’t promise confidentiality; reassure; avoid leading questions; record exact words; escalate immediately through the pathways below.

13) Reporting Pathways

Reports may be made by any member of the ISA community, including students, staff, volunteers, contractors, parents, and visitors.

Concerns about child safety should be reported to:

The ISA Director of Sport who acts the Child Safety Officer.

Doc I.D ISA – Child Safe	Created On	3/03/2026	Reviewed On	N/A	Next Review	Dec 2026	Prepared By	ISA Director of Sport	Authority	ISA Board	Approval Date	17/03/2026
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In cases of immediate danger, contact NSW Police (000).

Reports may also be made to the NSW Department of Communities and Justice (DCJ) via the Child Protection Helpline: 132 111 or 1800 212 936 (24/7)

All staff must use the NSW Mandatory Reporter Guide (MRG) to determine whether a child or young person is at risk of significant harm (ROSH) before making a report to the Department of Communities and Justice (DCJ). The MRG is available at <https://reporter.childstory.nsw.gov.au>.

If the MRG indicates a child is at risk of significant harm (ROSH), staff must make a report to the Child Protection Helpline and notify the ISA Director of Sport (Child Safety Officer). Staff must also report any allegations of reportable conduct to the ISA Chair, who is the Head of Entity under the Reportable Conduct Scheme administered by the NSW Office of the Children’s Guardian.

Students are encouraged to speak to a trusted adult or Child Safety Officer if they feel unsafe or have concerns. Age-appropriate reporting channels are available to ensure students can report in a way that feels safe and accessible. All reportable conduct information is subject to strict non-disclosure provisions under section 159 of the Children’s Guardian Act 2019.

14) Managing Allegations Against Staff/Officials

The ISA responds promptly and appropriately to all child safety concerns, including complaints, allegations, or disclosures of abuse or harm, reported by staff, volunteers, contractors, students, parents/carers, or others.

- Immediate risk assessment and measures to prevent contact between subject worker and children.
- Procedural fairness for all parties; safety planning and support for children/families.
- OCG notification timelines observed; Police/DCJ liaison.
- Trauma-informed communication consistent with child-focused complaint handling guidance.

15) Recordkeeping & Privacy

The ISA is committed to best practice in child safe record keeping, ensuring confidentiality and compliance with federal and state privacy legislation. Records of safeguarding incidents or concerns are maintained securely.

- Keep accurate, contemporaneous records of concerns, reports, decisions, actions and outcomes; retain WWCC verifications and training records.
- ISA will maintain records securely and for extended periods consistent with OCG Reportable Conduct “Keeping records” guidance and sector best-practice recommendations following the Royal Commission (noting some education/ECEC guidance references 45-year retention for serious child-safety matters as best practice).

16) Risk Management

The ISA recognises the importance of a risk management approach to minimising the potential for child abuse or harm to occur and we use this information to inform our policies, procedures and planning.

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Risk Management Plan: The ISA maintains a Child Safe Risk Management Plan that systematically identifies risks (e.g., physical environment, staff conduct, verbal and psychological harms such as bullying, discrimination, and hate speech, reporting failure) and establishes controls (e.g., Rule of Two, mandatory WWCC, supervision ratios) to eliminate or minimise the residual risk of harm, neglect, or exploitation.

Risk Tolerance: The ISA's tolerance for residual risk related to child abuse, neglect, or exploitation is ZERO tolerance for any risk rated as High or Medium.

Review and Evaluation: The ISA Child Safe Policy and Risk Management Plan must be reviewed annually by the ISA Board and immediately following any critical child safety incident or legislative change. Feedback will be gathered from children, families, and staff for continuous improvement.

17) Continuous Improvement & Assurance

The ISA is committed to the ongoing improvement of its Child Safeguarding Program through regular reviews to ensure effectiveness and compliance with relevant laws, regulations, and standards. The ISA actively seeks and incorporates feedback from students, families, staff, volunteers, contractors, and the wider community, and communicates any updates.

The ISA Board will annually review this Policy and the Child Safe Risk Management Plan, or sooner on legislative change or critical incidents.

18) Support & Communication

Child safety incidents can cause significant trauma and adversely affect the wellbeing of children and their families. In addition to fulfilling mandatory reporting obligations, the ISA has a duty of care to ensure affected students feel safe and supported.

Support measures are tailored to individual circumstances and may include:

- Provide links to help lines and support services.

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