



EBFC Child Safe Complaints Handling Policy

1. Purpose

This policy sets out our organisation's policy on child safe reporting and complaint handling.

Everyone in our organisation must:

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

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

2. Scope

This policy applies to all:

- Members and participants (including children and young people)
- Parents, families, and carers
- Coaches, trainers and volunteers
- Committee members and officials
- Visitors and contractors

3. Policy Principles

Emerald Boxing & Fitness Club will:

- Take all complaints seriously
- Act in the best interests of children and vulnerable people
- Treat everyone fairly and respectfully
- Maintain confidentiality and privacy wherever possible
- Ensure no one is victimised for raising a complaint
- Comply with all relevant laws and regulatory requirements

4. Definitions of harm and abuse

General definitions

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.

Reportable conduct definitions

In Queensland, reportable conduct refers to behaviour by an adult that poses a risk of harm to a child or young person and must be responded to in accordance with child protection and criminal law obligations.

For the purposes of this organisation, reportable conduct includes:

- Sexual offences committed against, with, or in the presence of a child
- Sexual misconduct, including grooming behaviour or inappropriate sexualised behaviour toward a child
- Physical abuse or ill-treatment of a child
- Neglect of a child, including failure to provide adequate care, supervision, or protection
- Assault against a child
- Failure to protect a child from harm, where an adult has the power or responsibility to reduce or remove the risk and does not do so
- Behaviour that causes significant emotional or psychological harm to a child, including intimidation, threats, humiliation, bullying, or coercive behaviour
- Failure to report child sexual abuse, where reporting is required by law

Sexual offence

A sexual offence is an offence of a sexual nature under a law of NSW, another state/territory, or the Commonwealth committed against, with or in the presence of a child, such as:

- sexual touching of a child
- a child grooming offence
- production, dissemination or possession of child abuse material.

An alleged sexual offence does not have to be the subject of criminal investigation or charges for it to be categorised as a reportable allegation of a sexual offence.

Sexual misconduct

Sexual misconduct of a child means any conduct with, towards or in the presence of a child that is sexual in nature (but is not a sexual offence). The following are examples of sexual misconduct:

- descriptions of sexual acts without a legitimate reason to provide the descriptions
- sexual comments, conversations or communications
- comments to a child that express a desire to act in a sexual manner towards the child, or another child.

Physical abuse or ill-treatment

Physical abuse or ill treatment of a child means conduct towards a child that is:

- unreasonable, and
- seriously inappropriate, improper, inhumane or cruel.

Ill-treatment can include a range of conduct such as making excessive or degrading demands of a child; a pattern of hostile or degrading comments or behaviour towards a

child; and using inappropriate forms of behaviour management towards a child.

Neglect

Neglect of a child means a significant failure to provide adequate and proper food, supervision, nursing, clothing, medical aid or lodging for the child that causes or is likely to cause harm to the child, by:

- a person with parental responsibility for the child
- an authorised carer or an employee if the child is in the employee's care.

Neglect can be an ongoing situation of repeated failure by a caregiver to meet a child's physical or psychological needs, or a single significant incident where a caregiver fails to fulfil a duty or obligation, resulting in actual harm to a child or where there is the potential for significant harm to a child.

Examples of neglect include failing to protect a child from abuse or exposing a child to a harmful environment.

Assault

An assault can occur when a person intentionally or recklessly:

- applies physical force against a child without lawful justification or excuse - such as hitting, striking, kicking, punching or dragging a child, or
- causes a child to apprehend the immediate and unlawful use of physical force against them, such as threatening to physically harm a child through words and/or gestures.

Behaviour that causes emotional or psychological harm to a child

Behaviour that causes significant psychological or emotional harm is conduct that is intentional or reckless (without reasonable excuse), obviously or very clearly unreasonable and which results in significant emotional harm or trauma to a child.

For a reportable allegation involving psychological harm, the following elements must be present:

- an obviously or very clearly unreasonable or serious act or series of acts that the employee knew or ought to have known was unacceptable, and
- evidence of psychological harm to the child that is more than transient, including displaying patterns of 'out of character behaviour', regression in behaviour, distress, anxiety, physical symptoms or self-harm, and
- an alleged causal link between the employee's conduct and the significant emotional or psychological harm to the child.

Unacceptable behaviours under our Code of Conduct

Our Child Safe Code of Conduct provides a list of unacceptable behaviours around children and young people that breach our Child Safe Code of Conduct.

All complaints are assessed against the Club's Code of Conduct, which outlines expected standards of behaviour. Breaches of the Code may result in disciplinary action.

5. Types of complaints (what to report)

This policy covers:

- Concerns – worries or discomfort about behaviour or decisions

- Suspicions – belief that inappropriate or unsafe behaviour may be occurring
- Disclosures – information shared by a person about harm or risk
- Allegations of harm – claims of abuse, neglect, harassment, bullying, or misconduct
- Breaches of the Code of Conduct

All complaints, concerns, or allegations relating to the safety and wellbeing of children and young people must be taken seriously and reported in accordance with Queensland law and this club's child safety procedures.

This includes, but is not limited to:

- criminal conduct involving a child or young person
- disclosures or reports of abuse, including sexual, physical, emotional abuse or neglect
- suspected harm or risk of harm to a child or young person
- allegations of reportable conduct, including allegations that a coach, official, volunteer, employee or other person associated with the club has engaged in conduct that may constitute abuse or misconduct involving a child
- unacceptable behaviour towards children and young people that breaches the club's Child Safe Code of Conduct

All members, volunteers, and officials are required to comply with the club's Child Safe Code of Conduct, which outlines the full list of unacceptable behaviours.

*A copy of the Code of Conduct is available on the EBFC website
www.emeraldboxing.com.au*

6. Making an external complaint/ report

Who must make an external report

It can be a criminal offence for adults not to report to police if they know, believe or ought reasonably believe that a child abuse offence has been committed against another person. In addition, it can be a criminal offence for people employed in an organisation that provides child-related services if they fail to reduce or remove the risk of a child becoming a victim of child abuse.

Mandatory Reporting

In Queensland, mandatory reporting is regulated by the *Child Protection Act 1999* (QLD). This Act sets out who is required to report, what must be reported, and the circumstances in which a report must be made to protect the safety and wellbeing of children.

Mandatory reporters are people who deliver the following services, wholly or partly, to children as part of their paid or professional work:

- Health care (e.g. registered medical practitioners, specialists, general practice nurses, midwives, occupational therapists, speech therapists, psychologists, dentists and other allied health professionals working in sole practice or in public or private health practices)
- Welfare (e.g. psychologists, social workers, caseworkers and youth workers)

- Education (e.g. teachers, counsellors, principals)
- Children’s services (e.g. childcare workers, family day carers and home-based carers)
- Residential services (e.g. refuge workers)
- Law enforcement (e.g. police)

In addition, children and young people, their families or advocates and members of the community who may interact with our services are encouraged to disclose and report to our organisation and will be supported when doing so.

How to make an external complaint or report

Reporting criminal conduct to police

It is of the utmost importance that criminal allegations involving children or young people are reported to the Queensland Police Service (QPS) as soon as possible. Where criminal conduct is suspected, police should be contacted before any internal action is taken that could compromise a police investigation.

In some circumstances, it will be clear that a report to police is required — for example, where there are allegations or disclosures of sexual abuse, grooming, or serious physical assault of a child. In other cases, it may be less clear. When in doubt, the club encourages reporting and seeking guidance from police.

Criminal allegations must be reported immediately. Taking risk management steps or commencing an internal investigation without first consulting police may jeopardise a police response.

Under Queensland law, failure to report or failure to protect a child from a sexual offence may constitute a criminal offence where a person has the power or responsibility to reduce or remove the risk and negligently fails to do so.

Contact the Queensland Police Service by attending or phoning your local police station for any matter that may constitute a criminal offence, including:

- sexual offences
- physical assault
- grooming behaviour
- producing, possessing or distributing child abuse material

For non-urgent police matters, contact PoliceLink on 131 444.

Reporting suspected harm or risk of harm

Any person in the community who has reasonable grounds to suspect that a child has been harmed or is at risk of harm may make a report to Child Safety Services.

Reports can be made:

- by contacting Child Safety Services through the Queensland Government reporting channels, or
- by calling 13 QGOV (13 74 68) for guidance on making a report.

Mandatory reporters under the Child Protection Act 1999 (QLD) must make a report when the legal reporting threshold is met.

Reportable conduct under Queensland child safety legislation

Where applicable, allegations or concerns may also be subject to Queensland's Reportable Conduct Scheme under the Child Safe Organisations Act 2024 (QLD).

The Reportable Conduct Scheme applies to eligible organisations and is allegation-based. A notification must be made when an allegation arises that a person associated with the club (such as a coach, official, volunteer or employee) may have engaged in reportable conduct.

Reportable conduct includes, but is not limited to:

- sexual offences or sexual misconduct involving a child
- physical assault of a child
- ill-treatment or neglect of a child
- failure to protect a child from harm
- failure to report suspected harm
- behaviour that causes significant emotional or psychological harm to a child

Where the scheme applies, reportable allegations must be notified to the Queensland Family and Child Commission within the required timeframes, in accordance with Queensland legislation and guidance.

Seeking guidance

If any member, volunteer, or official of the club is unsure whether a matter requires external reporting, they must immediately seek advice from the club's Management, or another authorised club official, who will assist in determining the appropriate reporting action.

7. Making an internal complaint/ report

Who must make an internal report

Everyone engaged to work or volunteer at Emerald Boxing & Fitness Club 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 complaint or report

Internal reporting by members, contractors and volunteers

- Complaints and Reports must be submitted in writing (email or complaint/incident reporting form)
- Include:
 - Name and contact details of complainant
 - Description of the issue
 - Dates, times, and people involved
 - Any supporting evidence

All breaches, disclosures and complaints must be reported to the Club Secretary or Management Committee.

Internal reporting by children and young people or their families or advocates, and other members of the community

- Complaints and Reports must be submitted in writing (email or complaint/incident reporting form)
- Include:
 - Name and contact details of complainant
 - Description of the issue
 - Dates, times, and people involved
 - Any supporting evidence

All breaches, disclosures and complaints must be reported to the Club Secretary or Management Committee.

Children may make complaints themselves or with the help of a trusted adult.

8. How complaints should be handled

Overview of the complaint-handling process

Once an allegation or complaint has been made, use this step-by-step process to make sure it is appropriately followed up:

1. steps are taken to identify and address any risks
2. the incident is recorded
3. reporting obligations are met, if necessary
4. an investigation is conducted, keeping everyone involved up to date with what is happening
5. ongoing support is offered to the child or young person as needed

6. the incident is reviewed and our child safe documents are updated, if necessary. This includes reviewing our Risk Management Plan.

Risk management on receiving an allegation or disclosure

It is the responsibility of the Management Committee to conduct a risk assessment after receiving an allegation, to ensure the safety of all people involved and maintain the integrity of any potential investigation.

Procedural fairness, privacy and confidentiality

All allegations of abuse or misconduct involving children and young people will be managed in a fair, transparent and timely manner, with due regard to the rights of all parties involved.

Any member, volunteer or official who is the subject of an allegation will be advised when a disciplinary or investigative process is to occur and informed of the nature of the process and what to expect.

The club complies with its obligations under the Privacy Act 1988 (Cth) and applicable Queensland privacy legislation.

Where relevant, reportable conduct matters are managed in accordance with the Reportable Conduct Scheme under the Child Safe Organisations Act 2024 (QLD) and in liaison with the Queensland Family and Child Commission (QFCC).

In addition:

- all information relating to complaints and allegations is recorded using the club's approved complaints and incident reporting form (see Appendix for a copy)
- completed reporting forms are stored securely and are only accessed by authorised persons with responsibility for oversight of the matter
- information may be shared with relevant government agencies, where permitted or required, under the Child Protection Act 1999 (QLD) to support the safety, welfare and wellbeing of children and young people
- the privacy and confidentiality of all individuals involved is maintained in accordance with the Information Privacy Act 2009 (QLD) and the Privacy Act 1988 (Cth)
- where an allegation is substantiated, any outcomes or responses will be determined having regard to advice and directions from relevant authorities, including the Queensland Police Service, Child Safety Services, and/or the Queensland Family and Child Commission

9. Support for People Making a Complaint

The Club will:

- Listen respectfully and without judgment
- Explain the process clearly
- Allow a support person to be present
- Provide referrals to external support services if needed
- Protect complainants from retaliation or victimisation

10. Keeping Families and Carers Informed

Where a complaint involves a child:

- Parents or carers will be informed as soon as appropriate
- Information shared will be limited to what is necessary
- Confidentiality and privacy obligations will be respected
- The safety and wellbeing of the child will be the priority

11. Confidentiality and Privacy

All complaints will be handled confidentially. Information will only be shared:

- To manage the complaint
- To ensure safety
- Where required by law

Records will be stored securely and managed in line with privacy legislation.

12. External Authorities

Emerald Boxing & Fitness Club requires all staff and volunteers to:

- Cooperate fully with external authorities, including police, child protection agencies, and regulators
- Immediately report allegations of harm where required by law
- Not interfere with or attempt to influence investigations

13. Relevant legislation

- Criminal Code Act 1899 (QLD)
- Child Protection Act 1999 (QLD)
- Child Safe Organisations Act 2024 (QLD)
- Working with Children (Risk Management and Screening) Act 2000 (QLD)
- Privacy Act 1988 (Cth)
- Information Privacy Act 2009 (QLD)

14. Policy Availability and Promotion

This policy will be:

- Publicly available on the Club's website and noticeboard
- Provided to all volunteers
- Explained to members and families
- Promoted during inductions and registrations

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

- create and display important information from our Child Safe Reporting Policy that describes what to report, who to report to and how to report, including fact sheets, brochures and posters
- provide staff with internal and external training opportunities so they understand processes for complaints and allegations
- share links to the Queensland Family and Child Commission's resources on reporting obligations, the Reportable Conduct Scheme, and child safe organisations

15. Approval and review

This policy was approved at the General Meeting of EBFC on 24th February 2026.

This policy will be reviewed annually to ensure relevance and effectiveness 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.

Date for review 23rd February 2027, or earlier if there are any critical incidents.

Appendix

EBFC Child Safety Complaint / Incident Reporting Form

Emerald Boxing & Fitness Club

Child Safety Complaint / Incident Reporting Form (Queensland)



This form is to be used to record a suspicion, allegation or disclosure of child abuse, or a complaint of unacceptable behaviour involving a child or young person.

Your name and position:

Name of the child or young person involved:

Name of person making the complaint (if different):

Name of person the complaint is made against:

1. Nature of the complaint

Include **time, date, location, what happened and who was involved**. This may include observations of the child or young person's behaviour.

2. Details of any injuries

Include whether the child or young person **received medical attention**.

3. Child's account or reason for concern

Accurately record **what the child or young person said**, using their **exact words**, where possible.

If the concern arises from an **indirect disclosure** (such as a drawing, behaviour or third-party information), record why you suspect abuse.

*Do not interview the child or young person unless it is part of your professional role. Formal investigations and interviews will be conducted by **Queensland Police Service** and/or **Child Safety Services**.*

4. Details of witnesses

Record the details of **anyone who saw or heard what happened.**

5. Does this complaint indicate possible child abuse?

(physical abuse, emotional or psychological abuse, sexual abuse or neglect)

Yes No

6. External or internal reporting

Who has this matter been reported to?

- Queensland Police Service (QPS)
- Child Safety Services (Department of Children, Youth Justice and Multicultural Affairs)
- Queensland Family and Child Commission (Reportable Conduct Scheme, if applicable)
- Internal club reporting (name role/person): _____
- Other (please specify): _____

7. People spoken to about this matter

List who was spoken to and why (e.g. police officers, Child Safety officers, QFCC staff, club officials).

Date(s):