

5. SAFE RESPONSES

PURPOSE

The purpose of this document is to provide guidance and direction to all **Australian Hockey Organisations** regarding how to safely respond to any concern raised about a child or young person.

SCOPE

These policies and procedures specifically apply to People in Hockey across all Australian Hockey Organisations (AHOs):

- Hockey Australia (HA)
- State and Territory Member Associations (MAs)
- Regional Associations
- Affiliated Clubs

NATIONAL PRINCIPLES

The following policy and procedures relate to National Principles:

6. Processes for complaints and concerns are child focused.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

Definitions

List of [definitions](#).

Responsibilities

Policy

- 5.1 Any incident, action or behaviour that does not comply with these policies and procedures may be considered a breach of policy and/or a breach of the law.
- 5.2 It is the responsibility of all People in Hockey to report any breaches and a breach may result in disciplinary action which, depending on the severity, may range from a written warning to termination of employment.
- 5.3 Additionally, all AHOs are required to report breaches of the law, therefore it may also result in action being taken by an external agency such as the Police.
- 5.4 It is the responsibility of all People in Hockey to familiarise themselves with the policies and procedures outlined in this document. If any Person in Hockey does not fully understand what is required of them it is their responsibility to seek further clarification, support and/or training by contacting a supervisor.

Responding to risks

Policy

Risk Management Frameworks

- 5.5 HA and some state and territory MAs have an endorsed Risk Management Framework that guides employees and volunteers in the identification, assessment, mitigation and management of all risks associated with the organization, including those related to the safety of children and young people. Where applicable these apply when responding to risks associated with children and young people.
- Where there is not an existing Risk Management Framework, this document will provide general guidance around the management of risks associated with children and young people.

Zero Tolerance

- 5.6 All AHOs have a number of 'zero tolerances' with respect to certain incidents or actions relating to children and young people, including:
- death or serious injury
 - anything that impacts negatively on the safety or wellbeing of a child or young person
 - anything that impacts negatively on the reputation of an AHO.

Procedures

Identifying and Assessing Risks

- 5.7 All People in Hockey conducting or responsible for any Hockey activity will conduct an 'informal' risk assessment by asking themselves the following questions and where possible, discussing with a colleague:
- What are we about to do?
 - What could go wrong?
 - What could we do to make it safer?
- 5.8 For more complex activities such as club events, tournaments or interstate trips, all People in Hockey must undertake a 'formal' risk assessment using the tools provided by HA or the individual MA Risk Management Framework. Where these do not exist, a more comprehensive assessment of risks may include the following questions:
- When, where, why, how are the risks likely to occur, and who might be involved (rare, unlikely, possible, likely or almost certain)?
 - What are the consequences of the risk, should it occur?
 - What is the impact of the consequence, should it occur (insignificant, minor, moderate, major or severe)?
 - What is in place to prevent this from occurring at all?

Mitigating Risks

- 5.9 In relation to the safety and wellbeing of children and young people, all AHOs will apply the following mitigations to reducing risks, along with any more specific mitigations that are raised during a 'formal' risk assessment.
- Ensuring that all People in Hockey interacting with children and young people are adequately recruited, trained and supported to understand and comply with their obligations.
 - Regularly engaging with children and young people to determine risks, or perceived risks to their safety and wellbeing, formally and informally.
 - Ensuring the physical space within which a Hockey activity involving children and young people takes place is safe from hazards and secured if necessary.
 - Conducting a full site risk assessment of venues where programs are held on a regular basis.

Reporting Risks

- 5.10 All People in Hockey must act on any risks associated with the safety and wellbeing of a child or young person.
- 5.11 Any risks that cannot be immediately mitigated, must be reported to the relevant person in the club, association or MA (depending on the type of risk eg/ facilities manager, Safe Hockey Officer, MPIO or chair /president).

Responding to Concerns

Policy

- 5.12 AHOs aim to provide a safe and supportive hockey environment to children and young people. However, in some instances behaviour, decisions and actions may not meet the expectations of the hockey community so people are encouraged to raise their concerns as an opportunity to address matters and at the same time, learn and improve from them.
- 5.13 A concern can be raised by anyone including a child, young person, family member, umpire, official, senior player, coach, manager, club member or member of the community.
- 5.14 A **Concern** may be categorised as a **Child Safety Concern** or a **Complaint**.
- 5.15 A **Child Safety Concern** may be categorized as a **Reportable Concern** or a **Low Level Concern**.
- 5.16 A **Complaint** may be categorized as a **Member Protection Matter**, a **Grievance or Dispute** or a **Disciplinary Matter**.
- 5.17 This document provides definitions, decision making criteria and a step by step process for responding to concerns raised about hockey. For additional information, see the [Safe Hockey Responding to Concerns Guide](#).
- 5.18 All AHOs aim to provide a clear, confidential and transparent process for receiving and responding to concerns based on the principles of natural justice.

Child Safety Concerns

Reportable Concerns

- 5.19 All People in Hockey will report any concerns regarding the abuse or neglect of a child or young person i) internally, ii) to the appropriate child protection services, and iii) to the police, in line with the relevant procedures.
- 5.20 If a child or young person is at imminent risk of harm or in immediate danger, People in Hockey are required to report the situation directly to the police.
- 5.21 If the concern raised relates to the safety of a child or young person and clearly or potentially indicates child abuse, illegal behaviour and / or a breach of the Safe Hockey Safe Kids Code, it is to be treated as a Reportable Concern. It does not have to have occurred within hockey to be a Reportable Concern.
- 5.22 A Reportable Concern may be raised with an AHO through one of the following mechanisms:
 - **Disclosure:** When a child or young person tells you about an incident or incidents of abuse, that happened to them or that they were directly involved in.
 - **Allegation:** When a child, young person or any other person tells you about an incident or incidents of abuse that happened to someone else or that someone else was directly involved in.
 - **Suspicion:** When you have a reason to suspect an incident or incidents of abuse against a child or young person has occurred, based on observations, instinct, behaviours and indicators
- 5.23 Evidence is not required to report a Reportable Concern to authorities. The person making the report must have only formed a Reasonable Belief.

A *Reasonable Belief* is when you use the information you have to decide that it is more likely than not that something has occurred or may occur.

- 5.24 Mandatory reporting is a legal requirement for certain people in certain roles to notify child protection authorities and the police of a concern relating to the safety of a child or young person. This policy requires all adults to report, regardless of the legislation, however further information relating to mandatory reporting can be found at - [Australian Government, Australian Institute of Family Studies](#)

Low Level Concerns

- 5.25 If the concern raised relates to the wellbeing of a child and young person but is not a clear breach of the Safe Hockey Safe Kids Code it is to be treated as a Low Level Concern.
- 5.26 A Low Level Concern may be suspicions or indicators of concerning behaviour or actions that are not sufficient in informing a reasonable belief but have been raised as a concern and therefore require noting and/or addressing.
- 5.27 More than one Low Level Concerns relating to a particular person or people may need to be escalated to a Reportable Concern.

Complaints

- 5.28 A complaint may be categorized as a **National Integrity Framework (NIF) Breach**, a **Club or Association** or a **Disciplinary Matter**.
- **NIF Breach** - Complaints may be made under the National Integrity Framework relating to breaches of the Code of Conduct, Member Protection Policy, Betting and Match-Fixing Policy, Illicit Drugs Policy and SSSM Policy and cover any conduct under these policies that is "Prohibited Conduct". This excludes any matter relating to the safety of a child or young person as these are captured under Reportable Concerns (see above).
 - **Club or Association** - grievances and or disputes are matters that are outside the scope of Member Protection and or Disciplinary Action. Personal grievances & disputes deal primarily with complaints between members of an AHO or a member and their affiliated AHO.
 - **Disciplinary Matter** - Disciplinary matters deal with offences that may arise in the conduct of hockey competitions and or events organised, controlled or sanctioned by an AHO.
- 5.29 All Reportable Concerns, Low Level Concerns and Complaints are to be dealt with according to the:
- [Safe Hockey Responding to Concerns Flow Chart](#) and additional information detailed below
 - [Safe Hockey Responding to Concerns Guide](#) for AHOs
 - Where necessary, the [HA Complaints and Disputes Policy](#)

Procedures

Receiving a concern

- 5.30 Determine if the concern raised relates to the safety of a child or young person under the age of 18 or not.
- If it does not, refer to the Procedures for handling a complaint.
 - If it does, determine if the concern is a disclosure, allegation or suspicion of grooming, physical, sexual abuse or neglect as per the following fact sheet [Reportable Concerns in Hockey](#)
- 5.31 If it is a disclosure, allegation or suspicion of grooming, physical, sexual abuse or neglect, refer to the Procedures for handling a Reportable Concern.
- If it is not, refer to the Procedures for handling a Low-Level Concern.
- If you are not sure, contact your Safe Hockey Officer (SHO) for support.

Reportable Concerns

First Responder

- 5.32 *Respond to the person* - immediately, but calmly. If the information is raised directly from a child or young person, remind them that they are believed and have not done anything wrong, and let them speak. Do not ask any questions as these may interfere with any investigation process.
- 5.33 *Record the information* safely and securely with as much detail as possible.
- 5.34 *Raise it with your designated Safe Hockey Officer* (or an alternate executive of your AHO if the SHO is unavailable) to discuss the matter.
- 5.35 *Report to authorities* by contacting both child protection authorities and the police in your local area. [For state / territory contact information](#)
- Complete a [Safe Hockey Child Safety Report \(CSR\)](#) and submit it to the SHO and club/association president.
- 5.36 *Register the concern* in the Safe Hockey Concerns Register and attach CSR.
- 5.37 *Review the process* and debrief with your Safe Hockey Officer.

Safe Hockey Officer (SHO)

- 5.38 *Receive the CSR and confirm receipt with first responder immediately.*
- 5.39 *Provide support to the first responder and associated club or association as required.*
- 5.40 *Escalate the CSR to the MA if it requires a media response and/or is an allegation against a Person in Hockey.*
- 5.41 *Register the CSR in the [Safe Hockey Concerns Register](#) (at association level).*
- 5.42 *Review the process and debrief with your MA.*

Member Association

- 5.43 *Receive the CSR and confirm receipt with the SHO immediately.*
- 5.44 *Manage provisional membership suspensions pending investigations, as required.*
- 5.45 *Notify Hockey Australia.*
- 5.46 *Support the SHO and associated club or association as required.*
- 5.47 *Manage the investigation or support police investigation in line with [HA Complaints & Disputes Policy](#) and [Code of Conduct Policy](#).*
- 5.48 *Manage communication with media and public*
- 5.49 *Register the CSR in the [Safe Hockey Concerns Register](#) (at association or MA level).*
- 5.50 *Review the process and provide HA with feedback on the process.*

Low Level Concerns

Club, Association or MA.

- 5.51 *Respond to the person - immediately, but calmly. If the information is raised directly from a child or young person, remind them that they are believed and have not done anything wrong, and let them speak. Do not ask any questions as these may interfere with any investigation process.*
- 5.52 *Notify your designated Safe Hockey Officer (or an alternate executive of your AHO if the SHO is unavailable) to discuss the matter. They can help to determine if the matter is actually a Reportable Concern.*
- 5.53 *Follow up on the Low Level Concern, if possible. This may mean an informal conversation with the person involved, offering additional training, individual or AHO wide reminder of Safe Hockey Framework or increasing supervision.*
- 5.54 *Register the Low Level Concern in the [Safe Hockey Concerns Register](#).*

THE RESPONDING TO CONCERNS FLOWCHART

SAFE HOCKEY OFFICERS (SHO)
Clubs and associations must delegate someone internal to hold the Safe Hockey portfolio until an SHO is recruited and trained.

Concern

A concern can be raised by anyone (a child, young person, family member, umpire, official, senior player, coach, manager, club member or member of the community) and be about anything (fixtures, facilities, behaviour of another young athlete, behaviour or actions of an adult).

CHECKPOINT

Does the concern relate to the safety or wellbeing of a child or young person under the age of 18?

Yes

No

Child safety concern

Complaint

CHECKPOINT

Is the concern a disclosure, allegation or suspicion of grooming, physical, sexual or emotional abuse or neglect?

Yes

No

A. Reportable Concern

B. Low Level Concern

Level: First Responder

1. Respond to person
2. Record the information
3. Raise with the SHO
4. Report:
 - to authorities
 - complete Safe Hockey Child Safety Report (CSR) and submit to SHO
5. Register
6. Review

Level: Club, Association or MA

1. Respond to person
2. Notify
3. Follow Up
4. Register

Level: Safe Hockey Officer (SHO)

1. Receive CSR
2. Provide support to first responder
3. Determine if the matter is about an alleged breach of a NIF policy (this includes the Code of Conduct or any Safe Hockey policy)
 - If yes - escalate the CSR to the state/territory MA.
 - If no, go to step 4.
4. Escalate CSR to MA if involves a Person in Hockey
5. Register
6. Review

Level: Member Association

1. Receive CSR
2. Manage provisional suspensions
3. Support club, Assoc and SHO
4. Notify Hockey Australia
5. Manage investigation or support police investigation
6. Manage comms and media response
7. Register
8. Review

CHECKPOINT

Is the complaint about:
An integrity matter? - go to C
Any other club/association grievances and disputes? - go to D
A hockey disciplinary matter - go to E

C. National Integrity Framework Breaches

D. Club/Assoc. Grievances & Disputes

E. Disciplinary Matters

Use the Safe Hockey Responding to Concerns Guide

Use the HA Complaints & Disputes Policy

Examples:

Concern	Category	Why
The women's grand final is held on the inferior field and consideration should be given to moving it to the superior field as it promotes a culture of equality particularly to young female players.	Complaint	It does not relate to the safety or wellbeing of a child or young person.
The under 13's coach is keeping one or two particular players back at the end of training every week but only ever for social reasons, not for anything to do with hockey, training or the game.	Low Level Concern	It does relate to the wellbeing of a young person but is not yet a clear breach of the Code of Behaviour.
A young player in my team spends every second weekend with his dad. He often misses games when he is with his dad and if he does come, he is withdrawn and timid and not his usual self. I have noticed red marks on his shoulders and neck on more than one occasion, the weeks he is with his dad.	Reportable Concern	It does relate to the safety of a child indicating physical abuse.
A senior umpire who is over the age of 18 is seen with an under 15s player behind the sheds, touching her and holding her and she looked really upset and uncomfortable.	Reportable Concern	It does relate to the safety of a child or young person and is a breach of the Code of Behaviour.

Troubleshooting Reporting Issues

Responsibility of Reporting

5.47 In the event that the supervisor doesn't agree that a notification to child protection or the police is necessary, the decision and responsibility to do so sits with the Person in Hockey who received the information. No-one can, nor should, tell someone that they cannot formally report the possible abuse or neglect of a child or young person, and the Person in Hockey needs to be sure that the report is made, and made accurately.

Protection of the Reporter

- 5.48 If a report is made in good faith, the person making it cannot be held legally liable, regardless of the outcome of the report.
- 5.49 Additionally, if a report is made in good faith, the person making it cannot be disadvantaged or treated unfairly because the report was made. This includes ensuring athletes are not excluded from the team, selection processes or matches based on the involvement in raising a concern of any kind.
- 5.50 State / territory legislation protects the identity of the person making the report.
- 5.52 The [HA Whistleblowing Policy](#) articulates the protections awarded to people who raise integrity concerns in hockey, including those relating to the safety of a child or young person.

Seeking Support

5.51 All People in Hockey involved in responding to and reporting a disclosure, allegation or suspicion of abuse are encouraged to seek help or support if needed.

Ongoing Concerns about the Safety or Well-being of a Child or Young Person

5.52 If a Person in Hockey has on-going concerns about the safety or well-being of any child or young person, despite following the above procedures, they must make accurate notes and discuss their concerns with their supervisor to determine an appropriate course of action.

Historical Reportable Concerns

- 5.53 Where allegations or disclosures of historical reportable concerns relevant to an AHO are received (more than 6 months ago), they are to be reported to the relevant authorities in line with these policies and procedures.
- 5.54 Go here for more information about the [National Redress Scheme](#)

Cooperating with Relevant Authorities

- 5.54 Regardless of the nature of any reported allegations or concerns, HA and all MAs must always cooperate with all relevant authorities and must freely provide information and support in accordance with legal and ethical obligations.
- 5.55 HA and all MAs will not undertake any internal investigations without approval from child protection authorities and/or the Police.