

1. PURPOSE

- 1.1. The purpose of this Code of Conduct is to outline the standards of behaviour, ethics and professionalism expected of all people working or volunteering for the organisation.
- 1.2. This code supports a safe, respectful and inclusive workplace and helps ensure Belgravia meets its legal, contractual and community responsibilities.
- 1.3. This Code supports Belgravia's commitment to embedding child safety and wellbeing in our leadership, culture, decision-making and everyday practice.
- 1.4. This Code aims to prevent harm by clearly setting out expected behaviours, promoting respectful and safe interactions, encouraging concerns to be raised and ensuring concerns, disclosures, allegations or suspicious of harm are responded to appropriately.
- 1.5. This Code applies to all aspects of Belgravia's operations within the leisure industry, including aquatic, recreation, stadium, fitness and childcare environments and applies to both physical and online interactions.

2. OUR COMMITMENT TO SAFEGUARDING CHILDREN AND YOUNG PEOPLE

- 2.1. Belgravia is committed to creating and maintaining safe, respectful, inclusive and child safe environments where children and young people are protected from harm.
- 2.2. Belgravia recognises that children and young people have a right to feel, be safe and participate in our programs, services and venues free from abuse, neglect, exploitation or discrimination.
- 2.3. The safety, wellbeing and best interests of the children and young people are central to our leadership, culture, decision making and everyday practice and take precedence over all other considerations.
- 2.4. Belgravia are committed to preventing harm through strong governance, clear policies, safe recruitment, staff and volunteer training, effective supervision safe physical and online environments and a culture that encourages speaking up.
- 2.5. Belgravia are committed to taking all concerns, complaints, disclosures, allegations or suspicious of harm seriously, and to provide culturally safe, inclusive and accessible environments for all children and young people from First Nations, culturally and linguistically diverse backgrounds, LGBTQIA+, children with disability and their families.

3. SCOPE

- 3.1. The Safeguarding Children and Young People Code of Conduct applies to every person undertaking work or activities for, or on behalf of Belgravia including board members, executive leaders, team members, volunteers, contractors, consultants, labour hire workers, students and work experience participants.

- 3.2. This Code of Conduct applies across all organisational operations, programs, services, events and activities, including aquatic centres, stadiums, recreation facilities, fitness centres, childcare venues, whether delivered onsite, offsite or online.
- 3.3. This Code applies to all interactions with children and young people, and to all child-related conduct connected to a person's role, including during work hours, outside normal hours, excursions, events, transport, change rooms, toilets, digital platforms and social media.
- 3.4. Compliance with this Code is a condition of employment or engagement. Failure to comply with may result in disciplinary action and/or termination of employment or engagement, and/or reporting to external authorities, including Police, Child Protection, Reportable Conduct Regulators, where a breach to child safety has occurred.
- 3.5. This Code of Conduct operates in conjunction with Safeguarding Children and Young People's Policy and Standard and other related policies and supports Belgravia meets its legal, regulatory and child safe obligations in Australia and New Zealand.

4. ABOUT THIS CODE

- 4.1. The Safeguarding Children and Young People Code of Conduct sets out the expected standards of behaviour for all people working or volunteering with Belgravia when interacting with, supervising or supporting children and young people.
- 4.2. The Code helps prevent harm by creating a shared understanding of child safe behaviours, professional boundaries, unacceptable conduct, and each person's responsibility to speak up about concerns.
- 4.3. The code ensures that all people working or volunteering for the organisation act with:
 - Integrity, honesty and professionalism
 - Treat others with dignity, fairness and respect
 - Comply with all laws and regulations
 - Act in a way that protects the safety and wellbeing of children and young people
 - Be accountable for their actions and decisions.
- 4.4. Child abuse can take many forms, include physical abuse, sexual abuse and emotional or psychological abuse, neglect, grooming, exploitation and exposure to family violence. Belgravia's Safeguarding Children and Young People Policy provide further information about types and indicators of abuse.
- 4.5. This Code identifies positive child safe behaviours that must be followed and unacceptable behaviours that would breach this policy and may create a child safety concern.
- 4.6. A breach of this Code may result in disciplinary action, termination of employment or engagement, and/or reporting to external authorities where required.

5. POSITIVE, CHILD SAFE BEHAVIOURS THAT ARE ENCOURAGED TO KEEP CHILDREN SAFE

I will:

- 5.1. Treat all children and young people with dignity, respect and fairness, regardless of age, ability, culture, gender identity or background.
- 5.2. Listen to and value children and young people's ideas and opinions, take their views, seriously and respond to them in an age-appropriate, respectful and supportive manner.
- 5.3. Create welcoming, inclusive and safe environments for children, young people and their families and carers across all venues, programs and activities.
- 5.4. Actively promote cultural safety and inclusion, including for Aboriginal and Torres Strait Islander children, Māori children, children from culturally and linguistically diverse backgrounds, children with disability and LGBTQIA+ children and young people.
- 5.5. Engage respectfully with parents, carers, families and support their participation in decisions relating to their child or young person's safety, wellbeing and participation in programs or activities.
- 5.6. Maintain professional boundaries at all times and promptly declare to Belgravia and manage actual, potential or perceived conflicts of interest early, including external relationships with children and families eg; Babysitting or outside relationship with a child or young person.
- 5.7. Comply with all relevant child safety legislation in Australia and New Zealand including adhering to all Belgravia Safeguarding Children and Young People policies, procedures and risk assessments.
- 5.8. Work collaboratively with colleagues, supervisors, contractors and volunteers to ensure that the safety, wellbeing and best interests of children and young people remain the priority in all actions and decisions.
- 5.9. Complete Belgravia Induction which includes Child Safety Lenny Module. Participate in all compulsory training or any training as outlined in legislation for your state/territory or in NZ and any refreshers as required.
- 5.10. Proactively identify, raise and report risks of child safety to your manager, on B-Connected, or to external authorities as required by legislation and outlined in the Safeguarding Children Young People's Policy and Standard. I understand that risks can include cultural, environmental, operational risks, child safety complaints and/or disclosures.
- 5.11. Respond appropriately to disclosures of harm or abuse by listening calmly, taking the child seriously, reassuring them and reporting the matter in accordance with legislation and Safeguarding Children and Young People Policy requirements.
- 5.12. Immediately report any concerns, suspicions or observed breaches of this Code of Conduct in accordance with organisational reporting procedures.

- 5.13. Take all reasonable and proportionate steps to protect children and young people from abuse, neglect, exploitation or harm including following Mandatory reporting legislation for Australia and NZ.
- 5.14. Respect the privacy and confidentiality of children, young people and their families by handling personal and child protection information appropriately and in accordance with privacy laws.
- 5.15. Ensure appropriate safeguards are in place during one-on-one interactions. (One on one interactions should only occur with management approval and risk assessment). Other safeguarding measures would be to have another adult present, within sight, or through approved supervision arrangements for situations of transport and/or squad.
- 5.16. Ensure that all digital communication with children and young people is age appropriate, respectful and directly related to work activities, use only Belgravia approved platforms or systems, include transparency and appropriate oversight and comply with privacy, recording keeping requirements and support safety, wellbeing and best interests of children and young people at all times.
- 5.17. Uphold the rights of the child and young people at all times and ensure their safety, wellbeing and best interests take precedence over all other considerations.

6. UNACCEPTABLE BEHAVIOURS THAT WOULD BE CONSIDERED A BREACH OF THE CODE OF CONDUCT

I will NOT:

The following behaviours are strictly prohibited. Any of these behaviours constitute a breach of this Code of Conduct and may result in disciplinary action and/or termination of employment or engagement and may also result in reporting to Police or statutory child protection authorities.

I will NOT:

- 6.1. Engage in, condone, facilitate, ignore or participate in any form of child abuse, neglect, exploitation or grooming including physical, sexual, emotional or psychological abuse including in Belgravia venues and/or online.
- 6.2. Ignore, disregard, minimise or fail to act on any concerns, suspicions, allegations or disclosures of harm or abuse involving a child or young person.
- 6.3. Trivialise, exaggerate or joke about or otherwise undermine the seriousness of child abuse or safeguarding concerns.
- 6.4. Use humiliating, discriminatory, threatening, degrading or offensive language or behaviour towards a child or young person.
- 6.5. Fail to report known or suspected child abuse to the organisation and to external authorities where required by Australian or New Zealand Law.

- 6.6. Engage in unwarranted, inappropriate or non-consensual physical contact with touching involving a child or young person (Note: Staff employed at Belgravia under the age of 18 years old are children by law).
- 6.7. Perform personal care tasks (such as dressing, changing clothes, or toileting) that a child or young person can reasonably do for themselves, unless authorised, required by the role and conducted in accordance with approved procedures (Eg; In childcare facilities where it is part of the role like nappy changes).
- 6.8. Persistently criticise, belittle, shame or denigrate a child or young person.
- 6.9. Intentionally isolate a child or young person or prevent them from forming age-appropriate friendships and social connections.
- 6.10. Verbally abuse, intimidate or threaten a child or young person, or create an environment of fear or emotional harm.
- 6.11. Supply, offer or encourage the use of alcohol, cigarettes (tobacco), vaping products, illegal substances (such as drugs) or misused medications to children or young people.
- 6.12. Expose a child or young person to pornographic, sexualised or otherwise inappropriate material, whether in person, online or through digital devices.
- 6.13. Encourage or engage in secretive, private or unapproved communication with a child or young person, including through personal messaging, social media or gaming platforms.
- 6.14. Share personal sexual experiences, sexualised content, seek inappropriate emotional dependence, send inappropriate sexual photos in person or via social media/digital devices and/or use sexual language, gestures or any grooming behaviours in the presence of child or young person. (NOTE: Belgravia employee staff that are under age of 18 years and by law are considered children)
- 6.15. Use personal devices (including mobile phones, tablets, smart watches, or other smart devices) to take, store, access or share images, videos or recordings of children or young people, except where expressly authorised and in accordance with Belgravia Mobile Phone Policy and Digital Devices and Recording Policy (for childcare facilities).
- 6.16. Communicate with children and young people, or staff under the age of 18 years old via personal phone numbers, private messaging apps, social media platforms, gaming platforms or email accounts, except where expressly authorised and conducted in accordance with Belgravia policies (Eg; for work purposes)
- 6.17. Breach personal boundaries, including forming inappropriate relationships with children or young people, whether during or outside of work hours. (NOTE: Belgravia have employees that are under age of 18 years and by law are considered children).
- 6.18. Retaliate against, victimise or disadvantage any person who raises a child safety concern or participates in safeguarding children and young people investigation in good faith or as part of their role.

7. TYPES OF BEHAVIOURS CONSIDERED A CONCERN AS PART OF A BROADER PATTERN OF BEHAVIOUR

I understand the following types of behaviour may be of concern:

- 7.1. Being alone with a child when there is no professional reason for doing so.
- 7.2. Showing favour to one child over others.
- 7.3. Babysitting, mentoring and/or tutoring a child out of work hours (without managerial approval).

8. ORGANISATIONAL EXPECTATIONS

- 8.1. All team members, volunteers, contractors must:
 - Understand their legal reporting obligations both internally and externally.
 - Immediately raise child safety concerns through Belgravia reporting channels as outlined in Safeguarding Children and Young People's Policy and Standard
 - Comply with directors relating to child and young people's risk management plan.
 - Cooperate with internal and external investigations
 - Understand and follow the National Principles and Child Safety Standards (applicable within Australia)
 - Understand and follow the Child's Act 2014 (applicable to New Zealand)
- 8.2. Failure to meet these obligations listed above constitute a breach of this Code of Conduct and may result in disciplinary action and/or termination of employment or engagement and may also result in reporting to Police or statutory child protection authorities.

9. INTERNAL AND EXTERNAL REPORTING OBLIGATIONS

- 9.1. All team members, volunteers, contractors must speak-up if they have concerns about the safety of children or young person. They must also report any disclosures by children and/or staff allegations/complaints received.
- 9.2. Concerns about breaches of this Code of Conduct must be reported to your supervisor. In the event the breach concerns your supervisor, make the report to their manager or the People & Culture team.
- 9.3. Some breaches of this Code of Conduct may need to be reported to the Police or other child safety authorities. Our Safeguarding Children and Young People Standard (including complaint handling procedures) provides more information about our reporting obligations to external authorities as well as describing protections and confidentiality provisions for anyone making a report.
- 9.4. The organisation has a Speak-up reporting line if you feel like you cannot safely disclose your concerns. Contact Speak-up on 1300 933 977 or make an online report at: <https://belgravia.grapevineonline.com.au>, or by mail to PO Box 1099, Carlton VIC 3053.

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10. RELEVANT CRIMINAL OFFENCES FOR FAILING TO REPORT CHILD ABUSE

- 10.1. Under Australian and New Zealand law, all adults working with children and young people have a legal obligation to protect children from harm. In some circumstances failure to report child abuse, or failure to take reasonable steps to reduce or remove the known risk, may constitute a criminal offence.
- 10.2. Mandatory reporting obligations apply to certain roles and jurisdictions. Where required by law, individuals must report suspected or known child abuse or neglect to Police or relevant child protection authorities as soon as practicable, in addition to internal reporting requirements
- 10.3. An individual may also commit an offence if they know, or reasonably ought to know, that a person poses a serious risk to a child and failure to take reasonable steps to reduce or remove that risk.
- 10.4. Where Belgravia is subject to reportable conduct obligations in certain jurisdictions, all staff must immediately report allegations or concerns internally and cooperate with any internal or external investigations
- 10.5. Failure to comply with these obligations may result in disciplinary action, or termination of employment or engagement and a report to external authorities.

11. AGREEMENT AND SIGNATURE

I have read this Code of Conduct and agree to abide by it and its terms

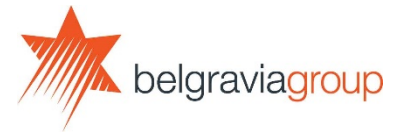
Your name:		Your signature:	
Your work location:		Date of signing:	

12. APPROVAL AND REVIEW DETAILS

Effective Date	01/07/2022
Review Date	07/07/2026
Policy Owner (name and role)	Scott Vanderheyden, General Manager – Health & Safety
Policy Owner contact details	svanderheyden@belgravialeisure.com.au
Policy Approver (name and role)	Matt Green, Chief Support Services Officer

Amendment History			
Version	Date	Author	Change description
V1.0	01/03/2017	Mark Maybury	Creation of the Child Safe Code of Conduct
V2.0	01/07/2022	Mark Maybury	Scheduled review. Significant rewrite of the Child Safe Code of Conduct

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V3.0	7/10/2025	S Vanderheyden	Inclusion of requirements around personal mobile devices, change to policy name.
V4.0	01/07/2026	S Vanderheyden	Updated Policy in line with National Principles and Child Safe Standards. Name Change to Safeguarding Children and Young People Code of Conduct from Code of Conduct to align with Policies and Procedures name changes. Increase in detail throughout document with updated legislative requirements and inclusion of NZ