

POLICY FOR THE SAFETY OF CHILDREN, YOUNG AND VULNERABLE PEOPLE

DEFINITION

The term 'vulnerable person' includes:

- a Child or Children; or
- an individual aged 18 years and above who is or may be unable to take care of themselves, or is unable to protect themselves against harm or exploitation by reason of age, illness, trauma or disability, or any other reason.

Therefore we feel it is important to include all who are in a vulnerable position, and not just children, within this policy. Within this document, unless specified, all references to children also encompass young people and vulnerable people.

COMMITMENT TO THE SAFETY OF CHILDREN, YOUNG PEOPLE AND VULNERABLE PEOPLE

Maccabi is committed to ensuring the safety of children, young people and vulnerable people throughout our organisation, by protecting the safety and wellbeing of all children and young and vulnerable people accessing Maccabi services, events and activities. This commitment is endorsed at the highest level and applies throughout all levels of our organisation.

Recent changes to the law and changes to convention in the community around us mean that we all have changed responsibilities. Our task is now to inform, train and educate our Participants about those responsibilities.

In accordance with its commitment to the safety of vulnerable people, Maccabi:

- has developed this Policy. This policy provides clear guidelines prohibiting any form of abuse against children and young and vulnerable people; and
- has adopted a procedure for the screening, recruitment and induction of individuals who are engaged in related work to undergo checks in accordance with relevant child protection legislation; and
- aims to train Maccabi Representatives to recognise signs of child abuse and to respond to allegations, suspicions and disclosures of abuse appropriately and in accordance with legislative requirements.

WHAT IS CHILD ABUSE

Child abuse involves conduct that puts children and young people at risk of harm (usually by adults, sometimes by other children) and often by those they know and trust.

Child abuse includes:

TYPE OF ABUSE	EXAMPLES	POSSIBLE INDICATORS
<p>Grooming which occurs when communication or conduct is linked to facilitating the involvement of a Child in future sexual behaviour with an Adult.</p> <p>Grooming can be conducted in person or online, for example via interaction through social media, web forums and emails. Many perpetrators of sexual offences against children purposely create relationships with victims, their families or carers in order to create a situation where abuse could occur.</p> <p>Grooming is not uncommon in child based organisations, due to the way in which many sex offenders target their victims.</p>	<ul style="list-style-type: none"> • Developing special relationships with, favouring or giving gifts to a Child. • Inappropriate interactions with Children either in person or via forms of media and electronic devices. • Asking a Child to keep a secret of any aspect of their relationship. • Testing of or ignoring professional boundaries or rules. 	<ul style="list-style-type: none"> • Being very secretive about how they're spending their time, including when online. • Having an older boyfriend or girlfriend. • Having money or new things like clothes and mobile phones that they can't or won't explain. • Underage drinking or drug taking. • Spending more or less time online or on their devices.
<p>Physical abuse occurs when a child is severely and/or persistently hurt or injured by an adult or caregiver.</p>	<ul style="list-style-type: none"> • Beating • Shaking • Burning • Excessive physical discipline • Attempted suffocation. 	<ul style="list-style-type: none"> • Unexplained bruises • Broken bones • The child keeping their arms or legs covered by clothing in hot weather.

TYPE OF ABUSE	EXAMPLES	POSSIBLE INDICATORS
<p>Sexual abuse occurs when a child is exposed or subjected to sexual behaviours that are exploitative or inappropriate to his/her age and development.</p> <p>Sexual abuse also includes sexual behaviour where the child is bribed or coerced into participating, where the child has less power than another person involved, or where there is significant difference in the development levels of the child and the other person involved in the behaviour.</p>	<p>Non-contact acts of sexual abuse include:</p> <ul style="list-style-type: none"> • making sexual comments by verbal, letter, telephone or via electronic communication; • exposure to pornography and/or voyeurism; • nudity - adult exposing parts of their body or a child's body; and • photography of child in a sexual or suggestive pose. <p>Contact acts of sexual abuse include:</p> <ul style="list-style-type: none"> • fondling a child's genitals or breasts, or forcing the child to fondle another person's genitals; • masturbation; • intimate kissing; • sexual penetration; • oral sex; and • exploiting a child through prostitution. 	<ul style="list-style-type: none"> • Inappropriate sexual behaviour for a child's age • Pain or bleeding in the anal or genital area • Secret relationships with adults.
<p>Psychological abuse is repeatedly treating and speaking to a child in ways that damage the child's self-esteem, perceptions, memory, moral development and intelligence.</p>	<ul style="list-style-type: none"> • Calling the child names • Isolating the child • Encouraging inappropriate behaviour. 	<ul style="list-style-type: none"> • Lack of trust • Feeling worthless • Self-harming behaviour.

TYPE OF ABUSE	EXAMPLES	POSSIBLE INDICATORS
<p>Emotional abuse occurs when an adult harms a child's development by repeatedly treating and speaking to a child in ways that damage the child's ability to feel and express their feelings.</p>	<ul style="list-style-type: none"> • Constantly putting a child down • Humiliating • Threatening • Belittling • Bullying • Ignoring a child. 	<ul style="list-style-type: none"> • High levels of anxiety • Child reverting to younger behaviour • Compulsive lying and stealing.
<p>Neglect is the failure to provide for a child's basic needs, such as food, medical care, education and supervision. Neglect can be acute, chronic or episodic.</p>	<ul style="list-style-type: none"> • Leaving a child alone without supervision • Infection due to poor hygiene • Lack of medical attention. 	<ul style="list-style-type: none"> • Signs of malnutrition • Poor hygiene • Clothing not appropriate to the weather.
<p>Exposure to Domestic Violence occurs when Children witness or experience the chronic domination, coercion, intimidation and victimisation of one person by another by physical, sexual or emotional means within a domestic relationship. Exposure to family violence places children and young people at increased risk of physical injury and/or psychological harm and has a significant impact on their wellbeing and development.</p>		<ul style="list-style-type: none"> • Sleep difficulties • Headaches and pains with no cause • Increased aggressive behaviour, angry outbursts • Hypervigilance • Regressive behaviour • Withdrawal • Increased separation anxiety

RESPONSIBILITIES

Maccabi Australia board

The Maccabi Australia board is responsible for promoting child safe best practice by ensuring appropriate policies and procedures are in place that minimise the risk of abuse towards children, young and vulnerable people, and have adequate safeguards established to respond to and deal appropriately with any allegations.

Maccabi state boards

The Maccabi State Boards are responsible for supporting the work of the Maccabi Australia Board, by ensuring that all Maccabi personnel (including staff and club committees) are aware of and following the appropriate policies and procedures. It is vital that the State Boards support, promote and champion these safeguards.

Executive director

The Executive Director is accountable to the board by ensuring the principles of a child safe organisation are implemented across the organisation. This includes having appropriate policies and procedures in place, and ensuring that they are monitored and evaluated on a regular basis.

Member Protection Officer

The MPO is responsible for ensuring that Maccabi's policies and procedures follow current industry best-practice. They are responsible for ensuring that Maccabi is equipped to provide a safe environment through staying up-to-date with legislation changes, and ensuring that all new information is clearly communicated to the relevant parties.

Clubs

The Clubs are responsible for ensuring that they are providing a child-safe environment. It is crucial that all relevant personnel have completed the Maccabi MPP training, have provided valid WWCC and show an understanding and appreciation for the policies and procedures around safeguarding children and young and vulnerable people.

CHILD SAFE STANDARDS AND NATIONAL PRINCIPLES

As part of our commitment to providing an environment that is safe and welcoming for children and young and vulnerable people, Maccabi Australia acknowledges that policies and procedures alone are not enough to keep children safe. A child safe organisation is one that creates a culture, adopts strategies and takes action to promote child wellbeing and prevent harm to children and young people.

As a result of the Betrayal of Trust Enquiry and the Royal Commission around institutionalised abuse, there are a number of checklists that organisations need to follow. In Victoria, there are 7 mandated child safe standards, and nationally there are ten national principles which have been endorsed by members of COAG (Council of Australian Governments). These standards and principles apply to everyone involved in our clubs – they apply to both paid and voluntary personnel.

The requirements of the Child Safe Standards and the National Principles are as follows:

- An organisation must have effective and practical strategies which help promote a culture of child safety and wellbeing across the organisation. This needs to encompass leadership, governance and culture.

This policy and the broader handbook give you many of the tools you need, but it's important to ensure that child safety becomes part of every Maccabi club and program. Practical suggestions include ensuring child safety and MPP are regular topics on your meeting agendas, and seeking further training opportunities for people in leadership positions.

- An organisation must have policies and procedures to ensure that the organisation is child-safe.

By adopting the Maccabi MPP, clubs and programs are showing their commitment to child safety by ensuring they are bound by comprehensive policies and procedures that support a safe and welcoming Maccabi environment for all children.

- Children need to be an active part of the discussion around child safety. They need to be made aware of their rights and responsibilities, and should be actively involved. Every part of the organisation needs to identify how they can promote the participation and empowerment of children.

Don't feel like you need to include children in every part of your club's decision making process – we understand that this isn't always practical. Some strategies to consider include: presenting the MPP and child safety information in a child-friendly manner, having a youth rep on your committee, and seeking feedback in appropriate ways such as online forms, suggestion boxes and training staff and volunteers in how to take feedback from children.

- It is important that all staff and volunteers follow the code of conduct and have a clear understanding of what is appropriate behaviour for working with children. They should be equipped with the knowledge and skills to keep children and young people safe.

It is imperative that all club personnel complete the online MPP training and agree to a code of conduct. Please speak to your state MPP representative if you would like additional training for your staff or volunteers, or would like someone to come and speak at your next board / committee / staff meeting.

- Anyone working with children and young people should be suitably screened, selected, supervised and supported. Ensuring that you have the right people in the job will significantly reduce the risks of child abuse.

Ensure that you conduct proper checks on your staff and volunteers. Anyone working with vulnerable people should provide appropriate checks and references. Make sure you go with your gut – if something doesn't seem right, look into it.

- It is important to recognise that we are part of a diverse community and to respect everyone's differences. It is especially important to understand that some children have a disability, come from a different country or primarily speak a language other than English – and that all of these factors will impact on their vulnerability.

It is equally important to ensure that your club or program activities aren't excluding anyone, and that the policies and communication are accessible to everyone. Ensure that your staff and volunteers know how to communicate with children with varying differences, and contact the Maccabi office if you need any materials in different formats (Easy English, different languages etc.).

- Everyone working with children needs to be aware of the processes for responding to and reporting suspected child abuse. These processes are child-centred and should equip all Maccabi personnel with the skills and knowledge to respond appropriately.

Look at the toolkit section for Maccabi's processes and procedures. Have discussions with your committees, staff and boards to ensure that people know how to take a disclosure of abuse and what the follow up steps are.

- Organisations need to include families and communities in the process of child safety and wellbeing.

Ensure that the child safety and MPP information is in an easily navigable place on your website and make sure that any registration forms and start of season documentation includes appropriate links and information. Have a safe and simple way for families to offer their feedback or ask questions about child safety.

- It is important that organisations do everything in their power to minimise the risks of child abuse. This applies to both physical and online environments, which should all support and promote child safety and wellbeing.

Ensure that your club or program has conducted a risk assessment, and highlighted the key risk areas. These might be around communication with kids, or around physical programs. If you encounter any risk areas that you are unsure how to handle, get in touch with your state MPP representative to discuss some strategies.

FAILURE TO DISCLOSE AND FAILURE TO PROTECT

It is important to note that there are certain legal requirements which apply to everyone, and others which apply specifically to 'people in authority' in an organisation. It is a responsibility and requirement of every adult that they report any disclosures of child abuse. The disclosure must be reported to the local police station or Crime Stoppers. There is an additional requirement for 'people in authority' to show that they have done everything they reasonably can to prevent abuse, should any cases of child abuse arise. This is essentially a duty of care which creates a presumption of liability, such that certain organisations will need to prove that they took "reasonable precautions" to prevent child abuse if they are defending a legal claim.

APPROPRIATE CONDUCT AND BEHAVIOUR

PHYSICAL CONTACT

Maccabi does not prohibit all physical contact between children and young people and Maccabi Representatives. Some physical contact may be required in the interests of training or coaching or assisting the individual.

At all other times the physical contact must be appropriate, for example to aid skill refinement and technique, based on the needs of the young person or child not the adult. It is recommended to ask the child or young person if you can show them a proper posture, for example, before slowly proceeding with minimal physical contact, rather than surprising them with contact even though it may be appropriate and minimal.

Under no circumstances should any Maccabi Representative have contact with a child or young person participating in Maccabi activities that:

- would appear to a reasonable person to have a sexual or suggestive connotation or purpose;
- includes touching genitals, breasts, or buttocks or face;
- is intended to cause pain or distress to the child or young person (for example physical discipline);
- is overly physical, for example, roughhousing, tickling, full frontal hugs or wrestling. Full front hugs should be avoided wherever possible. If a child initiates a hug, a side hug is recommended;
- is unnecessary for the age, stage or physical needs of child, for example assisting with toileting or showering when not required; and/or
- is initiated against the wishes of the child or young person, with the exception of such contact being necessary to prevent injury to the child, young person or another person.

In this case physical restraint must be the last resort, and the level of force must be appropriate to the specific circumstances and aimed solely at restraining the child or young person to prevent them from causing harm to themselves or others.

These restrictions exclude the delivery of medical or health services by appropriately medically trained personnel when required for the delivery of first aid.

SEXUAL MISCONDUCT

No sexual behaviour or romantic or intimate contact is permitted between a Maccabi representative and a person under the age of 18, unless they were a couple prior to their involvement with Maccabi. Even if the young person is over the relevant age of consent in their jurisdiction, it is not permitted as the relationship has been formed under circumstances where there is an imbalance of power. Sexual conduct involving a person placed in a position of authority, whether consensual or not, may be exploitative because there is usually a disparity between coaches and athletes in terms of authority, maturity, status, influence and dependence.

If a person under the age of 18 attempts to initiate an intimate relationship, the Maccabi Representative must take personal responsibility for discouraging the approach.

ELECTRONIC COMMUNICATION

Whilst social media and electronic communication are a significant part of how we communicate, it's important for Maccabi representatives to be mindful of their usage, especially with regards to communicating with children and young and vulnerable people.

In particular:

- Maccabi representatives are not permitted to actively 'friend', 'follow' or accept a friend request from a young athlete over whom they have authority via any social media platform.
- Any communication between a Maccabi representative (especially a coach or volunteer) and a young athlete needs to have a parent/guardian copied in or included in the chat.
- Any communication between a Maccabi representative (especially a coach or volunteer) and a young athlete must be for legitimate Maccabi purposes (for example, coaching feedback or training venues).
- Any communication from a Maccabi representative must be professional, not secretive or suggestive and must not contain any sexual or inappropriate content.

PHOTOGRAPHY

It is important to be mindful of behaviours around taking photos of children, young and vulnerable people. This includes what is taken by Maccabi representatives, but also being mindful of what images and videos are being taken by other people.

With regards to taking photos or videos of children:

- Permission must be obtained from parents/guardians for photos to be taken and used by the club/Maccabi. We recommend clubs including this information in their registration process.
- Only appropriate images may be used, in which the child is appropriately dressed and portrayed in a manner appropriate to Maccabi and sport.
- Cameras, phones and recording devices are not permitted to be used in change rooms, shower areas and toilets. This also applies to athletes – they should not be taking photos in areas where their teammates and other athletes are in a state of undress or vulnerability.
- Where an image of a child is used, do not display identifying personal information such as residential address, email address or telephone numbers or photo tags that could provide this information.

- Permission must be obtained from the parent/guardian if the photos are to be used for any commercial or third party use.
- Any external photographers engaged for Maccabi events should have a valid WWCC or state equivalent. Additionally, they should be made aware of Maccabi's guidelines regarding photography and video of children and vulnerable people.
- Any photos and videos should be taken when there are other people (ideally other Maccabi personnel) around.
- Any images containing inappropriate imagery of children must be destroyed and deleted. If these images were taken intentionally, further disciplinary and/or police action may be required.
- If you see someone taking photos or videos of Maccabi participants with no clear reason (i.e. a stranger), it is important to follow up and ensure that they are deleted.
- Image-based abuse is a growing concern and as such, it is important to be mindful of what images young participants are taking of those around them.

[For more information on appropriate usage of photos, refer to Maccabi's social media policy.](#)

ALCOHOL, SMOKING AND DRUGS

MAI has comprehensive policies regarding alcohol, smoking, drugs and doping. Additionally, the laws regarding the use and consumption of these substances by children and young people are always the minimum, and illegal activity may be referred to the police.

Illegal drugs and doping are not tolerated by anyone at Maccabi as they are fundamentally contrary to the spirit of sport.

Smoking, vaping and the consumption of alcohol are not permitted for any Maccabi participant under the age of 18. Anyone found to be in breach of this policy, whether by use/consumption, or by providing these substances to children and young people, will be subject to disciplinary action.

Additionally, it is highly recommended that alcohol is not served at events focused on/with a large contingent of junior athletes (e.g. Junior Carnival opening ceremony, MAI-run athlete parties at international games with a junior delegation).

TRANSPORT

Transporting children and young people to or from training or match venues by Maccabi Representatives (particularly coaches) is discouraged. However, it is recognised that it is not practical to prohibit it because from time to time Maccabi Representatives will be required to transport children in their own or rented vehicles to facilitate club activity. In such a case, if the driver is not a parent or sibling, then permission must be sought from the child/young person's parent or guardian and the appropriate form needs to be completed.

Maccabi strongly discourages Maccabi Representatives from being alone in a vehicle with children or young people. At all times another person (either another Maccabi representative, or the driver's child/sibling) should accompany the driver. This action is designed to protect both the child and the Maccabi Representative. A Maccabi Representative is only permitted to transport a child alone in a vehicle in case of emergency (when all possible other options have been explored and a third person is not available) and with the express permission of the parent / guardian. This must be communicated to the parent/guardian and a member of the club committee before the journey takes place, and wherever possible should be in writing (e.g. SMS).

At times, a Maccabi representative may be asked to transport a vulnerable individual (over 18), in order to facilitate their participation in a Maccabi activity. In these instances, it is preferable that another person is in the vehicle as well. If this is not an option, then the Maccabi representative may transport the vulnerable individual as long as:

- both parties are comfortable with this arrangement
- there is written approval from a parent / support worker / carer (if required)
- Maccabi is aware of this arrangement

IMPORTANT: There is a zero tolerance policy in relation to the consumption of drugs and alcohol when transporting children or young or vulnerable people. All drivers must be drug and alcohol free when transporting Maccabi participants.

TRAVEL

Please refer to the [travel policy](#) for additional requirements regarding travelling with young and vulnerable people.

CHANGE ROOMS

The right to children's privacy must be balanced with their need for safety and protection. Therefore Maccabi Representatives (especially coaches and managers) need to use their discretion based on the age, developmental stage and needs of the child or young person.

Broadly:

- Maccabi Representatives and parents should not dress or undress in a change room when any other children, other than their own child, are present;

- young people who identify as transgender (people whose gender identity is different from the sex assigned to them at birth) should be consulted on their preference of change rooms and their wishes respected at all time;
- in a public change room, a Maccabi Representative should supervise to ensure that children are safe from abuse from other members of the public;
- male Maccabi Representatives must not enter female change rooms and female Maccabi Representatives must not enter male change rooms; and
- coaches and managers should ensure that no photography of the children or young people in a state of undress occurs in the change room. If images are taken they must be deleted immediately. Depending on the situation, counselling or further disciplinary or legal action may be required.

There may be some circumstances where a child, due to age or ability, needs assistance with changing. In those circumstances, it is important to note that Maccabi Representatives and parents should not be in one - on - one situations with a child or young person, who is not their own child, when they are in a change room. If a participant requires extensive physical support on a regular basis in order to get changed, they may be required to provide a support worker or family member to assist.

ACCEPTABLE BOUNDARIES

All Maccabi Representatives must limit all contact with children and young people to what is reasonably expected to be Maccabi business. Appropriate boundaries include the following:

- Meeting or contacting children or young people outside of official Maccabi business is not permitted.
- Meeting alone with a child or young person whom they coach or supervise is not permitted. If meeting with a child or young person for coaching purposes, another Maccabi Representative or the young person's parent or another authorised adult must be present.
- External coaches or support personnel may not be invited to participate in Maccabi activities at any level without prior endorsement from the Club's Committee.
- Any specialised training or coaching must be offered to everyone in a team, and no favouritism or special treatment shown to one young person or child.
- Maccabi discourages its Representatives from providing separate personalised services (paid or voluntary) to the child's family e.g. babysitting, coaching or tutoring. If a parent wants to engage a Maccabi representative for these services, despite Maccabi's preferences, then it is incumbent upon the parent/guardian to take responsibility for any check required and services provided. Any arrangements will be external to Maccabi and not Maccabi's responsibility.
- The giving of gifts to a by a Maccabi Representative to young people or children who they coach or supervise is not permitted. The only exception to this rule relates to the next clause; that is, that gifts may be given upon attendance at a social function where the gift is

part of social etiquette and does not signify special treatment and cannot be misinterpreted or used for the purposes of grooming a child for sexual abuse.

- Maccabi Representatives must not attend a private social function of the child or young person except in exceptional circumstances such as significant milestone, for example an 18th birthday party or Bar or Bat Mitzvah party, or if an adult member of the child's family is a close friend of the Representative. However in these circumstances the following conditions must be followed:
 - the invitation must be sanctioned by the parent/guardian; and
 - other adults must be present at the function and the Maccabi Representative must not be alone with the child/young person or other young people or children; or
 - if the Maccabi Representative is a coach, the coach must inform their Club Committee that they want to attend the function and take on board any feedback regarding appropriateness of them attending.

APPROPRIATE LANGUAGE

Language and tone of voice used when speaking with children and young people or in the presence of young people should provide clear direction, boost their confidence, encourage and sustain them.

Language and tone of voice should not be harmful to children. Avoid language that is:

- discriminatory, sexist or racist or homophobic;
- derogatory, belittling, negative;
- intended to threaten, frighten or intimidate; and/or
- profane (swearing).

Language used must be appropriate to the circumstances and where possible nurturing towards the child or young person. Harmful language and using an aggressive raised voice should be avoided when disciplining a child or young person.

Jokes, stories or references which are sexual in nature should be avoided at all times.

GUIDELINES FOR PARENTS AND SPECTATORS

We expect all parents and other spectators associated with Maccabi to:

- observe Maccabi's guidelines for parents set out below;
- when necessary, politely and respectfully remind others of their obligations under these guidelines; and
- if witnessing another person behaving in a manner inconsistent with the MPP Handbook (particularly with respect to child safety), report the matter to a Maccabi official so that appropriate action can be taken. For further details on how to make a report of this nature, see the Grievance Resolution Guidelines in Chapter 6.

To create a safe environment, we have developed the following as an overarching guideline for parents:

- always comply with the Codes of Conduct;
- advise Maccabi of any special needs your child may have or develop relating to unique medical, physical, behavioural, and psychological factors that affect his or her development. Including but not limited to gender, health (asthma, physical abilities allergies etc.) and behavioural issues (Trauma, ADHD, self-harming etc.); and
- follow the rules and guidelines as determined by the association conducting the game or event.