



## CHILD SAFETY & WELL-BEING POLICY

### 1. Policy Statement

Titans Rugby League Pty Ltd ("the Club") supports the rights of children and young people by providing a supportive environment in which their safety and well-being is assured. The Child Safety and Well-Being Policy has been implemented to manage the risk of harm to children and youth within the operations of Titans Rugby League Pty Ltd.

The Club is committed to continuously providing a safe and supportive environment, and continually evaluating and improving strategies, policies and procedures to ensure that we:

- Create and maintain a culture that puts the safety of children and young people at the forefront.
- Develop and support a culture of continuous improvement and accountability for the protection of children and young people.
- Conduct thorough recruitment and screening processes to ensure that the organisation engages staff and volunteers who are suitably qualified and committed to providing professional, safe and enjoyable programs and services to children and young people.
- Provide written information and training material that allows our employees, volunteers and service providers to clearly understand their obligations.
- Comply with all legislative requirements and reporting protocols.

### 2. Scope

This policy applies to all Club operations, including but not limited to:

- NRL, NRLW and Titans Netball pathway programs (junior academies, development squads, elite pathways)
- Community engagement programs and school visits
- Fan events and game day activities involving children
- Training facilities and Club premises
- Online platforms and digital communications involving children

This policy applies to all Club personnel including employees, contractors, volunteers, coaches, players, Board members, and any other individuals who engage with children through Club activities.

**Definition of a Child:** For the purposes of this policy, a child is any person under 18 years of age.

**Child Safety Officer:** The designated person responsible for overseeing implementation of child safety policies and coordinating the Club's response to child safety matters.

**Harm:** Any detrimental effect of a significant nature on a child's physical, psychological, or emotional wellbeing.

**Personnel:** All employees, contractors, volunteers, coaches, players, Board members, and any other individuals engaged by the Club.

**Reportable Conduct:** Conduct of personnel that may constitute a sexual offence, sexual misconduct, physical violence, behaviour causing significant emotional or psychological harm, or significant neglect.

**Working with Children Check (Blue Card):** A screening process under Queensland legislation that assesses a person's suitability to work with children.



### 3. Resources

- Code of Conduct
- Workplace Behaviour Policy
- Grievance Resolution Policy
- [NRL Safeguarding Children and Young People Policy](#)
- [NRL Child Safe Code of Behaviour](#)
- [NRL Safeguarding Children and Young People – Recruitment and Screening Procedure](#)
- [NRL Safeguarding Children and Young People – Induction and Training Procedure](#)
- [NRL Safeguarding Children and Young People – Complaints and Reporting Procedure](#)
- [Netball Australia Safeguarding Children and Young People Policy](#)

### 4. Legislative Framework

The *Child Safe Organisations Act 2024 (Qld)* mandates that organisations providing services or spaces for children must implement and comply with the 10 Child Safe Standards and the Universal Principle. The Club is committed to compliance with all relevant child safety legislation, including:

- Child Protection Act 1999 (Qld)
- Working with Children (Risk Management and Screening) Act 2000 (Qld)
- Criminal Code Act 1899 (Qld)
- Work Health and Safety Act 2011 (Qld)
- Privacy Act 1988 (Cth) and Information Privacy Act 2009 (Qld)
- Discrimination Act 1991 (Qld)

The Queensland Family and Child Commission oversee implementation of the Child Safe Standards and Reportable Conduct Scheme, monitoring compliance and promoting continuous improvement in child safety practices across organisations.

### 5. Child Safety Standards

#### 5.1 Child Safe Standard 1 – Leadership and Culture

The Gold Coast Titans Board of Directors and Executive Leadership Team (ELT) are committed to embedding child safety and well-being into all aspects of Club operations, governance, and culture.

The Club's Board of Directors maintains oversight of Child Safety matters through regular reporting on child safety compliance, incidents, and improvement initiatives, while the CEO retains ultimate accountability with designated responsibilities distributed across relevant executives.

Child safety risks are systematically identified, assessed, and managed within the Club's WH&S risk management framework, supported by adequate allocation of resources across staffing, training, and systems. Child safety considerations are embedded throughout all Club policies, procedures, and operational documents, with this policy and its associated procedures subject to annual review or review following any significant incident. Leadership across the organisation actively promotes and models child-safe behaviours while fostering a speak up culture where concerns can be raised without fear of repercussions.

The Club has appointed a designated Child Safety Officer who is responsible for overseeing the implementation of child safety policies, coordinating training and education programs, managing complaints and concerns relating to child safety, liaising with external authorities as required, monitoring ongoing compliance across the organisation, and providing regular reporting to leadership on child safety matters.



## **5.2 Child Safe Standard 2 – Voice of Children**

The Club values children's voices and is committed to ensuring children are informed about their rights, can participate in decisions that affect them, and are taken seriously.

The Club empowers children by educating them about their rights to safety, respect, and being heard through age-appropriate communication and formats. Multiple participation mechanisms are established to enable children to provide feedback and contribute to program development, including regular player feedback sessions, anonymous surveys, and appropriate representation in planning discussions.

The Club takes all concerns, complaints, and feedback from children seriously, creating safe pathways for disclosure through various channels that allow children to raise concerns in ways that feel comfortable to them. All children participating in Club programs receive age-appropriate information about this policy, including who they can contact if they have concerns, contact details for the Child Safety Officer and external support services, and clear statements affirming their right to feel safe and be treated with respect.

## **5.3 Child Safe Standard 3 – Family and Community**

The Club recognises that families and communities play a vital role in promoting child safety and well-being, and is committed to keeping them informed and involved.

The Club will engage families and communities through maintaining transparent communication with parents and guardians by providing clear information about child safety policies, program structures, supervision arrangements, staff qualifications, screening requirements, and pathways for raising concerns or complaints.

Regular engagement is established through pre-season parent information sessions, ongoing updates via email, newsletters and online platforms, parent forums, and individual meetings regarding player development and well-being.

The Club collaborates with local clubs, schools, community organisations, and government bodies to strengthen child safety across the rugby league community, while providing families with access to welfare and support services, child safety information, and resources that support positive parenting and youth development. An inclusive and respectful environment is maintained where families feel comfortable engaging with the Club and raising concerns. Parents and guardians receive a copy or summary of this policy, Code of Conduct expectations for parents and spectators, emergency contact protocols, and comprehensive information about complaints processes.

## **5.4 Child Safe Standard 4 – Equity and Diversity**

The Club is committed to upholding equity and respecting diverse needs in all policies and practices, ensuring all children feel safe, included, and valued regardless of their background, identity, or circumstances.

The Club promotes equity and diversity by ensuring programs and activities are accessible and welcoming to children of all cultural and linguistic backgrounds, abilities and disabilities, gender identities and sexual orientations, religious beliefs, socioeconomic circumstances, and geographic locations. Barriers to participation are actively identified and addressed, including financial barriers through scholarships and equipment assistance, physical accessibility of facilities, communication accessibility through translation services and visual aids, and transport and location considerations.



The Club recognises that some children may be more vulnerable to harm and provides targeted support where needed, including children with disability, from culturally and linguistically diverse backgrounds, identifying as LGBTIQ+, in out of home care, or experiencing family violence or other trauma. Staff are equipped to understand and respect diverse cultural practices, family structures, and communication styles, while the Club maintains zero tolerance for discrimination, bullying, or harassment based on any aspect of a child's identity. Reasonable adjustments are made to support the participation and safety of children with diverse needs, developed in consultation with the child and their family.

### **5.5 Child Safe Standard 5 – People**

The Club is committed to ensuring that all people working with children are suitable, well supported, and reflect child safety values in their practice.

#### **Recruitment and Screening**

The Club implements rigorous recruitment processes ensuring all roles involving contact with children have clear position descriptions outlining child safety responsibilities. All staff, contractors, and volunteers must hold and maintain a current Queensland Blue Card and any other relevant professional registrations or certifications. Thorough reference checks are conducted with specific questions about child safety and suitability to work with children, National Police Checks are obtained where required, and all recruitment interviews include child safety questions and scenarios. Probationary periods are utilised to assess ongoing suitability.

#### **Induction and Ongoing Training**

All employees, volunteers and contractors working with children receive comprehensive induction training covering this Child Safety and Well-Being Policy, Code of Conduct expectations, recognition of harm and abuse, reporting obligations and procedures, and appropriate boundaries and relationships with children.

Regular professional development in child safety is provided at least annually, with relevant colleagues having access to appropriate supervision, mentoring, and support structures.

Performance reviews regularly assess adherence to child safety values and practices.

#### **Code of Conduct**

All employees, volunteers and contractors must sign and adhere to the Club's Code of Conduct for Working with Children, which outlines expectations for professional boundaries, appropriate behaviour, and ethical conduct.

#### **Monitoring and Review**

The Club maintains a register of all Blue Cards and Working with Children Checks, monitors expiry dates to ensure timely renewals, and immediately stands down any person whose Blue Card is suspended or cancelled. Periodic reviews of personnel suitability are conducted to ensure ongoing compliance and appropriateness.

### **5.6 Child Safe Standard 6 – Complaints Management**

Titans Rugby League Pty Ltd has procedures in place to assist in identifying, responding and reporting observations, disclosures or suspicions of harm. All complaints or feedback provided to Titans Rugby League Pty Ltd will be documented and responded to within 24 hours.

The Club maintains an accessible, transparent, and child focused complaints process that prioritises the safety and well-being of children throughout. Multiple pathways are provided for children and families to report concerns, with information about how to make a complaint displayed prominently at all Club facilities, included in program information packs, available in multiple languages where appropriate, and communicated in age-appropriate formats.



Personal information is protected and shared only on a need to know basis in accordance with privacy legislation and the best interests of the child. All complaints are acknowledged within 24 hours and investigated promptly, with children and families offered appropriate support throughout the process, including access to counselling or advocacy services.

### **Reporting Pathways:**

- Direct contact with the Child Safety Officer
- Any Club staff member (who will escalate appropriately)
- Email: [safekids@nrl.com.au](mailto:safekids@nrl.com.au)
- Email: [netballspeakup@coreintegrity.com.au](mailto:netballspeakup@coreintegrity.com.au)
- External authorities (Queensland Police, Child Safety Services)

### **Obligations of Person Receiving a Report**

**Step 1:** If the Child or Young Person is in imminent risk of harm or immediate danger, the reporting person is required to report the situation directly to the police - CALL '000'.

**Step 2:** Regardless of whether the matter is reported to the police, the reporting person must also immediately contact the NRL Child Safety Officer by emailing [safekids@nrl.com.au](mailto:safekids@nrl.com.au) or Netball Australia integrity unit by emailing [netballspeakup@coreintegrity.com.au](mailto:netballspeakup@coreintegrity.com.au). In taking a report or disclosure of an incident from others, the reporting person is not to assess the validity of allegations or concerns, but to report all allegations as described.

**Step 3:** When practical, the reporting person must make a report on the applicable online reporting platform:

**NRL/NRLW: Make a Child Protection and Safeguarding Report.** This report should be accompanied via an email to [safekids@nrl.com.au](mailto:safekids@nrl.com.au). In some circumstances, the NRL Child Safety Officer (or their delegate) may take a statement and formally record the statement in the Child Safety Database.

**Netball Australia:** [Core+ Platform](#)

### **Obligations of Child Safety Officer**

When the Club's appointed Child Safety Officer is notified of a reportable incident, the following should occur:

1. Offer support to the child/young person, the parents/carer and the person who reports the incident;
2. Initiate internal risk management processes to ensure the safety of the child, clarify the nature of the complaint and, where applicable, commence disciplinary process;
3. Create a record of the report based on the reporting person's recollection of events;
4. Obtain advice as applicable and decide, in accordance with legal requirements and duty of care, whether the matter should/must be reported to the Police or Child Protection in the relevant jurisdiction and make a report as soon as possible;
5. Report internally to Executive Leadership and externally to regulators, oversight bodies if the allegation is reportable, and working with children operators where appropriate;
6. Wait for clearance from authorities (where reported to an external agency) before starting investigations.

### **Titans Child Safety Officer:**

Position: Head of People & Culture  
Email: [report@titans.com.au](mailto:report@titans.com.au)  
Phone:



### **5.7 Child Safe Standard 7 – Knowledge and Skills**

The Club is committed to ensuring all staff and volunteers are equipped with the knowledge, skills, and awareness to keep children safe through ongoing education and training.

All personnel working with children must complete:

#### **Within 30 days of commencement:**

- Child Safety and Wellbeing Policy acknowledgement
- Online e-learning facilitated by either the NRL or Sports Integrity Australia (personnel will be advised of the appropriate module for their role)
- Cultural safety and diversity awareness training

#### **Annual Refresher Training:**

- Policy and procedure updates
- Case studies and scenario-based learning
- Emerging issues in child safety
- Continuous improvement initiatives

#### **Role Specific Training** (as applicable):

- Coaching qualifications including child safeguarding components
- First aid and emergency response
- Mental Health First Aid and suicide prevention
- Online safety and digital communication with children
- Trauma informed practice
- Managing disclosures of harm

The Club will maintain records of all training completed by personnel, including dates, content, and attendance.

### **5.8 Child Safe Standard 8 – Physical and Online Environments**

The Club is committed to ensuring physical and online environments promote safety and well-being and minimise opportunities for children to be harmed.

#### **Facility Design and Maintenance**

The Club conducts regular safety audits of all facilities used by children, ensuring appropriate lighting, visibility, and sightlines throughout. Secure and age-appropriate equipment is maintained, safe transport arrangements are established, and facilities are accessible for children with disability. Designated areas for activities are provided with appropriate supervision arrangements.

#### **Supervision Standards**

Adequate adult to child ratios appropriate to age and activity are maintained, with no one-on-one situations permitted in isolated areas such as closed rooms or vehicles. Clear guidelines are established for changing rooms and bathroom facilities, visitor sign in procedures are enforced, and access to certain areas is restricted to authorised personnel only.

#### **Risk Management**

Risk assessments are conducted for all activities involving children, with control measures implemented to mitigate identified risks. Emergency response procedures and evacuation plans are established and regularly reviewed, and first aid availability and incident response protocols are maintained across all programs and facilities.



### **Digital Communication Standards**

All communication with children occurs through official Club channels only, with no personal social media, phone numbers, or private messaging permitted. Group communications are preferred over individual messages, with transparent communication practices including copying parents or guardians where appropriate. Professional language and appropriate content are maintained at all times, and personal information about children is never shared online without consent.

### **Social Media and Online Platforms**

A clear social media policy governs staff and player conduct, with Club social media platforms involving children subject to active moderation. Children receive education about online safety, privacy, and appropriate digital behaviour, while parental consent is required for any images or videos of children published online. Children's personal information is protected in accordance with privacy legislation.

### **Technology Use**

Filters and monitoring systems are implemented on Club networks, with secure storage protocols for any photos or videos involving children. Clear protocols govern the use of photography and videography at Club events to ensure appropriate capture, storage, and use of images involving children.

## **5.9 Child Safe Standard 9 – Continuous Improvement**

The Club is committed to regularly reviewing and improving implementation of the Child Safe Standards.

The Club will engage in continuous improvement through:

- Comprehensive review of this policy and all associated procedures
- Updates to reflect legislative changes, best practice, and lessons learned
- Consultation with stakeholders including staff, children, families, and community partners
- Quarterly child safety reports to the Board of Directors
- Incident analysis and trend identification
- Monitoring complaints, incidents, and near-misses
- Analysing data to identify systemic issues or areas for improvement
- Benchmarking against industry best practice
- Regular surveys and feedback from children, families, and staff
- Exit interviews with departing staff
- Engagement with external child safety experts and advisory bodies
- Periodic independent audits of child safety compliance
- Engagement with Queensland Family and Child Commission resources and guidance
- Participation in industry forums and learning networks

### **Following any child safety incident or near-miss, the Club will:**

- Conduct a thorough review to identify contributing factors
- Implement corrective actions and preventative measures
- Share learnings with relevant personnel (while maintaining confidentiality)
- Update policies, procedures, or training as required

## **5.10 Child Safe Standard 10 – Policies and Procedures**

The Club is committed to maintaining comprehensive policies and procedures that document how the entity is safe for children.



## 6. Universal Principle – Cultural Safety for Aboriginal and Torres Strait Islander Children

The Club recognises the importance of creating culturally safe environments for Aboriginal and Torres Strait Islander children and is committed to:

### 6.1 **Governance and Leadership**

- Seeking guidance and input from Aboriginal and Torres Strait Islander community members and Elders in the development and review of child safety policies and practices
- Ensuring Aboriginal and Torres Strait Islander voices are represented in decision making processes affecting children
- Partnering with local Aboriginal and Torres Strait Islander communities and organisations

### 6.2 **Cultural Competency**

- Providing cultural awareness training for all staff and volunteers who work with children
- Recognising and respecting the cultural identities, connections to Country, and community relationships of Aboriginal and Torres Strait Islander children
- Acknowledging the historical context of child removal and institutional harm, and working to build trust

### 6.3 **Programs and Practice**

- Incorporating culturally appropriate practices and Indigenous perspectives into pathway programs and activities
- Celebrating and promoting Aboriginal and Torres Strait Islander culture through Club activities and events
- Ensuring Aboriginal and Torres Strait Islander children and families feel welcomed, valued, and respected in all Club environments

### 6.4 **Complaints and Support**

- Ensuring complaints processes are culturally appropriate and accessible
- Providing access to Aboriginal and Torres Strait Islander support services where appropriate
- Recognising that family and community connections are central to the well-being of Aboriginal and Torres Strait Islander children

## 7. Reportable Conduct Scheme

In our roles working with children and members of the community, we may be exposed to children who may be at risk of harm, abuse, or neglect. All Club personnel have a legal and ethical responsibility to recognise and respond to these situations appropriately. The Club is committed to ensuring all personnel understand their mandatory reporting obligations under Queensland law and are equipped with the knowledge and confidence to act when concerns arise.

Protecting children is everyone's responsibility, and the Club supports all personnel in fulfilling their legal duties to report suspected harm, abuse, or neglect through the appropriate channels. This section outlines the key reporting obligations that apply to Club personnel and the processes for reporting concerns about a child's safety or well-being.

### **Mandatory Reporting Obligations**

All Club personnel must comply with mandatory reporting obligations under Queensland law, including:

- **Child Protection Act 1999:** Reporting reasonable suspicions of harm or risk of harm to a child to Child Safety Services
- **Criminal Code Act 1899:** Reporting knowledge or reasonable suspicion of sexual offences against children to Queensland Police

### **What to Report**



Personnel must report if they:

- Form a reasonable suspicion that a child has been harmed, is being harmed, or is at risk of harm;
- Become aware of or reasonably suspect sexual abuse of a child;
- Observe concerning injuries, behaviours, or disclosures from a child;
- Have concerns about a child's safety or well-being and;
- The belief arises from information obtained by the person during the course of, or because of, the person's work (whether paid or unpaid).

Reportable conduct includes:

- Sexual offences or misconduct;
- Physical violence or assault;
- Behaviour that causes significant emotional or psychological harm;
- Significant neglect.

The [Responding and Reporting Flow Chart](#) included in the Appendix to this policy is a quick reference guide that can be used to determine when and how individuals should report.

#### External Support and Reporting:

- **Queensland Police (Emergency):** 000
- **Child Safety Services:** 1300 682 254
- **Kids Helpline:** 1800 55 1800
- **13HEALTH:** 13 43 25 84
- **Queensland Family and Child Commission:** (07) 3900 6000

## 8. Breach of Policy

Any breach of this policy may be subjected to disciplinary action, up to and including termination of employment.

All grievances raised relating to this policy will be handled in accordance with the Club's Grievance Handling Policy.

## 9. Employee Assistance Program

The NRL's Employee Assistance Program (EAP) is available to all Gold Coast Titans employees. TELUS Health is a professional and confidential coaching and support service, and provides a free and confidential counselling service for employees and their family members.

Employees can access this service by calling 1300 460 205 or visiting [one.telushealth.com](https://one.telushealth.com).

## 10. Document Management

Version	Date	Author	Changes
1.0	1/12/2025	People & Culture	Draft Policy. Approved by Board 20.02.2026
2.0			
3.0			

<b>Issue Date:</b>	1 March 2026
<b>Review Date:</b>	Annually from issue date unless specified by legislation or legislation has changed
<b>Policy Owner:</b>	People and Culture
<b>Policy Author:</b>	People and Culture Manager
<b>Policy Approver:</b>	Board



<b>Policy Reference:</b>	3.04
<b>Policy Category:</b>	People and Culture