



**Child Safe  
Code of Conduct**  
*February 2024*

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<b>Approval Date</b>	22 January 2024
<b>Effective Date</b>	22 January 2024
<b>Review Period</b>	Every twelve (12) months
<b>Review Date</b>	22 January 2025

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# 1. Purpose

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The *Child Safe Code of Conduct* outlines the expected standards of behaviour required when engaging with children. It aims to provide clear guidance to staff on what is appropriate and inappropriate behaviour when interacting with children.

# 2. Scope

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This Procedure applies to BlueFit staff and Board members. For the purpose of this Policy, BlueFit staff includes full time employees, part time employees, casual employees, contractors, board members and volunteers. Prior to commencing work at BlueFit, staff must sign this Code of Conduct as acknowledgment they have read and understood its contents.

This Code of Conduct extends to all aspects of BlueFit’s child-related activities and programs.

# 3. Terms and Definitions

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For the purposes of this Procedure:

Term	Meaning
<b>CALD</b>	Culturally and Linguistically Diverse.
<b>Child</b>	Refers to a person under the age of 18 years, unless under the law applicable to the child, majority is attained earlier.
<b>Child abuse</b>	Refers to the acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. The forms of child abuse are sexual abuse, emotional abuse, neglect, physical abuse, and exposure to family violence.
<b>Child Safety Officer (CSO)</b>	Refers to the individuals appointed by BlueFit who are responsible for matters relating to child safety, including the management of child safety complaints.
<b>Facility</b>	Refers to a facility operated by BlueFit.
<b>National Safety Manager</b>	Refers to the individual appointed by BlueFit who is responsible for child safety matters across the organisation.
<b>Patron</b>	Refers to any adult (who is not a BlueFit staff member) who visits a BlueFit Facility.
<b>Staff</b>	Refers to full time employees, part time employees, casual employees, contractors and volunteers.

## 4. Reporting a Breach of the Code of Conduct

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BlueFit fosters an environment where staff, children, and patrons are encouraged to voice any concerns relating to child safety. Concerns or complaints regarding a breach of this Code of Conduct should be reported to the relevant Facility CSO, the National Safety Manager, or the relevant supervisor/manager.

## 5. Child Safeguarding Responsibilities

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Staff are required to:

- ✓ Comply with BlueFit's *Child Safe Policy* and supporting procedures
- ✓ Report any concerns, allegations, or disclosures of abuse in accordance with BlueFit's *Child Safe Complaints Handling Procedure*
- ✓ Be responsive to the views and concerns of children, especially if they communicate (verbally or nonverbally) that they feel unsafe
- ✓ Treat children with respect and consideration, taking into account their diverse backgrounds and needs
- ✓ Comply with child safe legal obligations as applicable in your State or Territory
- ✓ Report any breaches of the *Child Safe Policy* or this *Code of Conduct*.

## 6. Professional Boundaries

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Staff are required to:

- ✓ Conduct all interactions and communications with children within the scope of their role and assigned responsibilities (as specified in their position description or contract).

Staff are prohibited from:

- ✗ Having one-on-one contact with a child outside of authorised BlueFit programs (this includes contact in physical and online environments)
- ✗ Forming close personal relationships with children outside of BlueFit programs
- ✗ Permitting bullying to occur between children
- ✗ Encouraging a child to keep secrets, such as asking them not to tell their parent/guardian when the staff member has communicated with them

- ✗ Accepting invitations to attend private social events with children and/or their families
- ✗ Purchasing gifts or other items for children without prior authorisation from BlueFit Management and the knowledge of the child's parents/guardians
- ✗ Providing children with alcohol, drugs, tobacco, or pornography
- ✗ Being under the influence of any alcohol, illicit drugs, medication, or fatigue that may impair their ability to perform their role
- ✗ Giving a child special attention or isolating them from peers to engage in inappropriate behaviour.

## 7. Communication

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Staff are required to:

- ✓ Use clear, age-appropriate and positive language that creates a fun and inclusive environment
- ✓ Use clear, age-appropriate and positive language that creates a fun and inclusive environment
- ✓ Maintain a professional and supportive manner when speaking to children
- ✓ Encourage and support positive friendships among children
- ✓ Speak to children at eye level, where possible. For example, swim instructors may need to crouch down in the pool to be at face-to-face level with the child.
- ✓ Intervene when negative language or behaviour is being used by a child, parent/guardian (or any person) and emphasise that such behaviour is inappropriate
- ✓ Communicate with children and their families only through authorised BlueFit channels, for example, by work email or phone.

Staff are prohibited from:

- ✗ Publicly embarrassing or humiliating a child
- ✗ Using stereotypes, innuendo or sarcasm when communicating with children
- ✗ Using abusive, offensive, threatening or sexual language when communicating with a child. For example, calling a child names, or making derogatory comments about their appearance.
- ✗ Using language that is discriminatory, racist, or sexist
- ✗ Engaging in unauthorised contact with a child online

- ✗ Engaging in open discussion about inappropriate adult themes in the presence of a child
- ✗ Using a computer, mobile phone, camera, or other device to exploit or harass a child  
Using personal social media platforms to befriend or communicate with children or their families.

## 8. Supervision

Staff are required to:

- ✓ Remain within the visibility of other BlueFit staff when interacting with children
- ✓ Ensure supervision is active and diligent. Staff must always be in a position to intervene and/or respond to a child when required.

In addition to the above, staff are also required to adhere to the behaviours outlined in the table below, as relevant to their service/program area.

Service/Program Area	Responsibilities
<b>BlueFit Swimming</b>	BlueFit Swimming staff are required to: <ul style="list-style-type: none"> <li>✓ Supervise classes at all times throughout the lesson, in and around the water</li> <li>✓ Use visual eye contact with all children throughout the lesson and must not turn their back to the class.</li> </ul>
<b>BlueFit Kids</b>	BlueFit Kids staff are required to: <ul style="list-style-type: none"> <li>✓ Adhere to appropriate supervision ratios in accordance with the age and gender of the children, and the size of the group.</li> </ul>
<b>Bluebottles Creche</b>	BlueFit Creche staff are required to: <ul style="list-style-type: none"> <li>✓ Actively supervise children at all times</li> <li>✓ Adhere to appropriate supervision ratios in accordance with the age and gender of the children, and the size of the group.</li> </ul>
<b>BlueFit Aquatic Facilities</b>	BlueFit Aquatics staff are required to: <ul style="list-style-type: none"> <li>✓ Communicate and enforce KeepWatch supervision requirements, including age of entry into facilities and change rooms.</li> </ul>

Staff are prohibited from:

- ✗ Being alone with children in a direct, unsupervised capacity
- ✗ Leaving children unsupervised

- ✗ Allowing a child to go with another parent/guardian without the written consent of the authorised parent/guardian
- ✗ Taking a child or groups of children to areas where they cannot be observed by other BlueFit staff, or into rooms that can be locked
- ✗ Texting, talking, or browsing the internet or apps on a mobile phone when supervising children.

## 9. Physical Contact

Physical contact is appropriate in situations where staff may be required to provide first aid or attend to a child in an emergency situation where a child's safety or life is at risk.

Staff are required to:

- ✓ Obtain consent from a child before engaging in physical contact (if it is necessary to use physical contact) and explain why the physical contact is required.
- ✓ Use non-intrusive touch to comfort a child who is upset or to encourage a child to participate. For example, a handshake or pat on the back/upper arm.
- ✓ Respect and respond to signs that a child is uncomfortable with physical contact
- ✓ Take into consideration the child's needs and the level of assistance required when determining whether physical contact is necessary
- ✓ Immediately report any physical contact initiated by a child that is inappropriate (e.g. sexualised and/or aggressive) to the relevant Facility CSO, or other BlueFit Manager.

In addition to the above, staff are also required to adhere to the behaviours outlined in the table below, as relevant to their service/program area.

Service/Program Area	Responsibilities
<b>BlueFit Swimming</b>	BlueFit Swimming staff are required to: <ul style="list-style-type: none"> <li>✓ Explain to the child at the beginning of the class why physical contact may be required e.g. to assist in the demonstration of a skill.</li> <li>✓ Keep hands visible above the water's surface</li> <li>✓ Use a noodle or other equipment to support the child to minimise physical contact</li> <li>✓ Use gentle handling when engaging in necessary physical contact during hands-on correction. For example:               <ul style="list-style-type: none"> <li>○ <i>Supporting a child's hands and across their shins during diving activities</i></li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ <i>Supporting a child's arms and head during backstroke development and correction</i></li> <li>○ <i>Allowing a child to hold onto your forearm instead of your shoulders during freestyle development and correction.</i></li> <li>✓ Minimise physical contact once the child becomes more confident in their abilities. For example             <ul style="list-style-type: none"> <li>○ <i>By using only verbal instructions and corrections</i></li> <li>○ <i>Only assisting with foot flexion and glide phase of the breaststroke kick.</i></li> </ul> </li> </ul>
<b>BlueFit Kids</b>	<p>BlueFit Kids staff are required to:</p> <ul style="list-style-type: none"> <li>✓ Only use physical contact where necessary to assist in an activity or demonstrate a skill, such as throwing a ball</li> <li>✓ Ensure that children with additional needs, or those who require toileting or mobility assistance, have an approved Guidance and Support Plan outlining the appropriate physical contact required to meet the child's specific needs.</li> </ul>
<b>Bluebottles Creche</b>	<p>BlueFit Creche staff are required to:</p> <ul style="list-style-type: none"> <li>✓ Ensure consent is received from the child's parent/guardian prior to assisting with nappy changing/toileting.</li> </ul>

Staff are prohibited from:

- ✓ Touching a child in areas of a sexual nature such as the breasts, buttocks or genitals
- ✓ Using intrusive forms of discipline such as smacking, hitting, slapping or kicking  
Initiating, permitting or requesting unacceptable physical contact with a child, such as hugging, massages or kisses
- ✓ Using physical restraint to restrict a child's movement against the child's will, including any force applied to the head, neck, hair or shoulders, or any force applied to hands, arm, wrist or legs
- ✓ Engaging in acts that are of a personal nature with a child, such as changing clothes or going to the bathroom when the child can do so independently
- ✓ Creating situations that result in unnecessarily close physical contact with a child, such as tickling
- ✓ Forcing a child to do something against their will. For example, forcing a child into or under the water.
- ✓ Permitting a child to smack or hit another child
- ✓ Threatening to hurt a child through words or gestures

- ✓ Using aggressive force against a child.

## 10. Use of Change Rooms

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BlueFit adopts the following guidelines in relation to the use of change rooms to ensure the safety of children:

- ✓ Children aged 5 years and under may enter toilets corresponding to the gender of their accompanying parent/guardian. In absence of a parent/guardian, the child may be accompanied by a minimum of 2 staff members (of the same gender).
- ✓ Children aged 6 years and older should use the change rooms that aligns with their gender.

Staff are required to:

- ✓ Use the correct gender marked change rooms at all times
- ✓ Ensure adequate supervision of children in change rooms while respecting their right to privacy
- ✓ Knock or announce themselves before entering change rooms to supervise.

Staff are prohibited from:

- ✗ Entering change rooms of the opposite gender
- ✗ Isolating themselves with a child, such as taking a child into a cubicle
- ✗ Allowing mobile phones to be used in toilets or changing areas
- ✗ Undressing when children are present in the change rooms.

## 11. Use of Photographic and Video Devices

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Staff are required to:

- ✓ Seek informed consent from a child's parent/guardian prior to taking photographs or videos of children
- ✓ Clearly explain to the parent/guardian how authorised photographs and videos will be used by BlueFit
- ✓ Ensure photographs or videos taken do not include other children (who have not provided consent), particularly when the individual can be identified

- ✓ Obtain consent from both the child and their parent/guardian prior to posting a photograph or video on the online environment
- ✓ Destroy/delete images of children (digital and hard copy) as soon as they are no longer required
- ✓ Report inappropriate photography/videoing to the relevant supervisor or Facility manager.

Staff are prohibited from:

- ✗ Taking photos or videos of children for personal use
- ✗ Storing images of children on their personal device
- ✗ Using a computer, mobile phone, camera, or other device in a way that is inconsistent with BlueFit's *Child Safe Policy* and supporting procedures
- ✗ Sharing personal information, including photographs of children without the informed consent of the child's parent/guardian
- ✗ Tagging a child in a photograph on social media platforms such as Facebook or Instagram
- ✗ Exposing a child to pornography or other indecent material
- ✗ Possessing or creating child abuse material.

## 12. Breach of this Code of Conduct

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Staff who engage in behaviour that is in breach of this Code of Conduct will be subject to disciplinary action. BlueFit responds promptly to all breaches of this Code of Conduct. Refer to BlueFit's *Child Safe Complaints Handling Procedure* for guidance on reporting obligations in the event of a breach of this Code of Conduct.

## 13. Document Control

### Distribution Record Register

Copy	Issued to	Controlled Copy		Authorised by	Recipient Signature	Issue Date
		Y	N			
1						
2						
3						
4						
5						

### Amendment Record Register

Issue#: 1

Issue Date:

Rev. #	Date	Details		Description of Changes	Approved By
		Section #	Para. #		
1					
2					
3					
4					
5					

## 14. Related Policies and Procedures

Related Policies, Procedures and/or Guidelines
Child Safe Complaints Handling Procedure
Child Safe Policy
Child Safe Risk Management Procedure
Disciplinary Policy
Limited Physical Contact Policy

## 15. Staff Acknowledgement

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I have read and understood this *Child Safe Code of Conduct*. I understand I will be subject to disciplinary action if I breach this Code of Conduct.

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_