

1.0 Scope

This policy applies to all our people (“employees”, “team member/s”, “team”), independent contractors (“contractors”) and Board members when you perform work with the Sport Integrity Commission Te Kahu Raunui (“the Commission”).

This policy covers all children under the age of 18 years.

2.0 Purpose

The Commission recognises that at any time within our roles, our people may have reason to be concerned about the safety of a child.

The purpose of this policy is to outline how the Commission will respond to:

- suspected neglect or abuse of a child,
- disclosure of abuse or neglect made by a child, and / or
- harm to self or others.

3.0 Legislative requirements

The Children’s Act 2014 requires prescribed State services to have child protection policies. The Commission is a prescribed State service.

This means that the Chief Executive must ensure that the Commission:

- has a child protection policy,
- makes the child protection policy available on the Commission’s website,
- reviews the policy every 3 years after its adoption,
- requires that every contract or funding arrangement with an independent person includes a requirement for the person to have a child protection policy if they provide children’s service or the contract is about children’s services, and
- report in the Commission’s annual report on the implementation of these requirements.

4.0 Policy Statement

The Commission is committed to upholding the rights of all children to be safe from violence and harm.

This Child Protection Policy sets out policies, expectations, processes, and practices for identifying and responding to potential child abuse and neglect. It reflects the commitment of the Commission to:

- protecting and upholding the mana of children / tamariki and respecting their rangatiratanga / right to self-determination;

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- seeing children within the context of their families, whānau, hapū, iwi and communities; and
- children’s voices and experiences being central to their safety and wellbeing.

This Child Protection Policy also aligns with and contributes to the Commission’s broader work to ensure that sport and recreation is safe and fair for everybody. This work manifests as a kākahu (cloak) which provides protection and resilience against harmful behaviours and attitudes in sport and recreation. Children that interact with the Commission and our people strengthen the kākahu and are held within it.

Te Tiriti o Waitangi provides a framework for the protection of the rights and interests of Māori including tamariki Māori. The provisions under Te Tiriti o Waitangi guarantee to tamariki Māori active protection including the use of measures to detect, defend against and mitigate potential risks. It also guarantees to tamariki the right to equitable access of resources, tools, and processes.

5.0 Responsibilities

Every person in the Commission has responsibilities to help implement this policy.

Role	Responsibilities
Board	<ul style="list-style-type: none"> • Approves the Commission Child Protection Policy and subsequent amendments. • Responsible for adhering to this policy.
Chief Executive	<ul style="list-style-type: none"> • Accountable for the Commission meeting its responsibilities under this policy. • Accountable for ensuring the Commission meets its responsibilities under the Children’s Act 2014. • Seeks approval from the Board and promotes the policy.
Child Safeguarding Officer	<ul style="list-style-type: none"> • Designated role responsible for child protection within the Commission. • Responsible for receiving reports and recording them in the Child Protection Incident Register. • Responsible for supporting team members, independent contractors and board members to follow the policy. • Ensures that the appropriate authority is notified when a person has a belief that a child has been, or is likely to be, abused or neglected. • Responsible for the Child Protection Incident Register. • Responsible for adhering to this policy.
Manager (including people or contract manager)	<ul style="list-style-type: none"> • Responsible for ensuring their people and contractors understand and adhere to this policy.

and the Quality Manager)	<ul style="list-style-type: none"> Responsible for adhering to this policy.
Team members and independent contractors	<ul style="list-style-type: none"> Responsible for notifying and discussing any child protection concerns, including any suspected abuse or neglect with their manager and/or the Child Safeguarding Officer.

Refer to **Appendix 1** for a high-level summary of the roles and responsibilities when responding and reporting abuse and/or neglect.

6.0 Training and support

The Commission will:

- support people to understand and follow this policy
- provide support to the Child Safeguarding Officer and managers/people leaders to fulfil their responsibilities
- provide training to people at the start of their employment that ensures they understand the principles and processes in this policy and know how to identify and report abuse or neglect in the context of their work
- provide specific training to roles that have contact with, or design processes and activities for, children
- provide refresher training annually or bi-annually (depending on role requirements)
- undertake debriefing processes with people following a disclosure, and
- encourage people to access supports, such as the Employee Assistance Programme (EAP), and if professional supervision if/as required to maintain their wellbeing.

7.0 Types of child abuse and neglect

Child abuse is defined in the Oranga Tamariki Act 1989 as “the harming (whether physically, emotionally, or sexually), ill-treatment, abuse, neglect or deprivation of any child or young person.”

Child abuse is an umbrella term to describe the various forms of a harm that exist, such as, but not limited to, physical, emotional, and sexual abuse, or neglect. The table below defines what child abuse and neglect can look like, noting this is not an exhaustive list.

Content warning: *the next section contains definitions and descriptions of types of abuse and neglect. This may be triggering or distressing, so we encourage you to protect yourself / your wairua when engaging with this content and seek support if you need to.*

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Term	Definition
Child	For the purposes of this policy, any child/children under the age of 18 years.
Child abuse	<p>Child abuse is defined in the Oranga Tamariki Act 1989 as “the harming (whether physically, emotionally, or sexually), ill-treatment, abuse, neglect or deprivation of any child or young person.”</p> <p>Child abuse is an umbrella term to describe the various forms of harm that exist, such as, but not limited to, physical, emotional, and sexual.</p>
Disclosure	Information shared with people by a child in relation to abuse or neglect, or suggests their safety is at risk.
Emotional abuse	<p>An act or omission that results in adverse or impaired psychological, social, intellectual, or emotional functioning or development. Emotional abuse occurs when a child is subject to a series or pattern of experiences that batter their emotional, psychological, or social well-being and sense of worth.</p> <p>This can include patterns of isolations, ongoing criticism, rejection, degradation, corruption, exploitation, terrorising, or negative comparison to others. It might also be exposure to whānau or intimate partner violence, or the involvement in illegal or anti-social activities.</p> <p>Emotional abuse is almost always present when other forms of abuse occur. The effects of this form of abuse are not always immediate or visible. The long-lasting effects of emotional abuse may only become evident as a child becomes older and begins to show difficult or disturbing behaviours or symptoms.</p>
Neglect	<p>Neglect is a pattern of behaviour that occurs over a period of time and results in impaired functioning or development of a child. It is the failure to provide for a child’s basic needs.</p> <p>Neglect is the most common form of child abuse, and though the effects may not be as obvious as physical abuse, it is just as serious.</p> <p>Neglect might be:</p> <ul style="list-style-type: none"> • Physical: failure to provide basic needs of food, shelter, or warmth. • Medical: failure to seek, obtain or follow through with medical care for the child. • Abandonment: leaving a child in any situation without arranging necessary care for them. • Neglectful supervision: failure to provide developmentally appropriate or legally required supervision. • Refusal to assume parental responsibility: unwillingness or inability to provide appropriate care for a child. • Educational: allowing chronic truancy, failure to enrol in education or inattention to education needs. • Emotional: not providing comfort, attention and love.

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<p>Physical abuse</p>	<p>Any acts that may result in the physical harm of a child or young person. It can be, but is not limited to; beating, kicking, shaking, biting, cutting or throwing a child. It might also be strangulation, suffocation, poisoning, fabricating or inducing illness.</p> <p>Excessive or inappropriate discipline or violence within the family is also considered physical abuse, regardless of whether it was intended to hurt the child. Physical abuse may occur as a single episode or a series of episodes.</p> <p>Injuries to a child may vary in severity and range from minor bruising, burns, welts or bite marks, major fractures of the long bones or skull to its most extreme form, the death of a child.</p>
<p>Sexual abuse</p>	<p>Any acts that involve forcing (no consent) or enticing a child to take part in sexual activities, regardless of whether they are aware of what is happening. Sexual abuse includes acts or behaviours when an adult, or a person with more power or age, uses a child for sexual reasons.</p> <p>Under New Zealand law, anyone under the age of 16 is not considered old enough to give consent to sexual activity, even if the child or young person agrees to the activity. This is immediately classified as child sexual abuse.</p> <p>While it may involve a stranger, most sexual abuse is perpetrated by someone the child knows and trusts.</p> <p>Sexual abuse includes a range of unwanted behaviours, that includes, but is not limited to physical, emotional, or online abuse. Some examples of physical sexual abuse might be sexual violation which is rape or unlawful sexual connection (this includes all types of sex – vaginal, oral, anal, object or digital¹), physical violence (e.g. strangulation, choking), fondling of breasts or genitals, unwanted touching or kissing or indecent exposure to the child or seeking to have a child touch them or expose themselves for a sexual purpose.</p> <p>Sexual abuse can also include behaviours that do not involve physical touching, but use emotional abuse and manipulation, including intimidation, threats of punishment if a child does not obey instructions, and sexual grooming. It also includes voyeurism, photographing child inappropriately, involving a child in pornographic activities or prostitution.</p> <p>Sexual abuse can also take place online and over social media. For instance, it might be receiving sexual content or photos, revenge porn, initiating sexual conversations with child using the internet or the phone.</p>

¹ The use of fingers or toes in sexual activity

Term	Definition
Indications of abuse or neglect	<p>The indicators of potential abuse or neglect may be physical or behavioural, and differ across the forms of child abuse:²</p> <p>Physical indicators relate to the physical condition and wellbeing of child, e.g. ranging from burns or bruising to signs of malnourishment or inappropriate clothing for the weather.</p> <p>Behavioural indicators are behaviours or traits that suggest child abuse has occurred e.g. severe symptoms of depression, anxiety or aggression, poor social skills, wariness of adults or of a certain individual. It may also include a child talking about things that indicate abuse (including an allegation or disclosure).</p> <p>In many cases, indicators are found in combinations or clusters. Indicators do not necessarily prove that a child has been harmed. They are clues that alert us that abuse may have occurred and that a child may require help or protection. Sometimes, indicators can result from life events that do not involve abuse, for example divorce, accidental injury, or the arrival of a new sibling.</p>

8.0 Identifying and reporting abuse and neglect

If a team member, independent contractor, or board member believes a child is at risk of serious harm, they must follow the disclosure and reporting processes set out below.

This policy sets out our high-level disclosures and reporting processes. Refer to the relevant information on Hono for more information.

9.0 Process for responding to, reporting and notifying a disclosure

When carrying out their functions, our people and independent contractors may receive a disclosure of abuse from a child. For example, a disclosure when testing (doping control) an athlete that is a minor, or disclosure from a child that is involved in an investigation the Commission is undertaking.

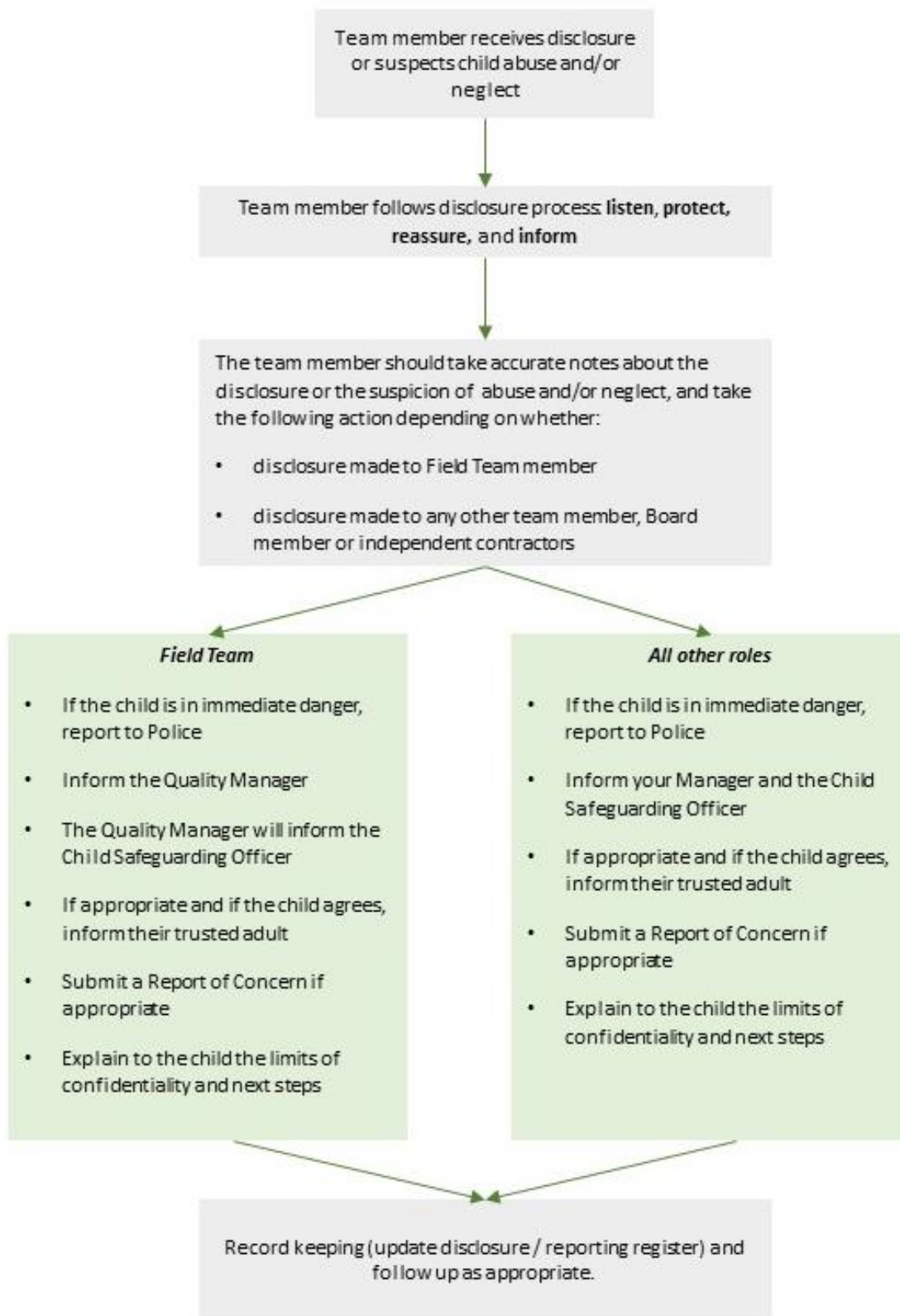
The disclosure process set out in **Appendix 2** should be followed when responding to and dealing with disclosures.

The flow-chart below shows the high-level process for reporting and notifying disclosures. More detailed processes for recording and notifying disclosures across the Commission are set out in **Appendix 3**.

Diagram 1 – Process for reporting disclosures

² Indicators have been sourced from the [‘Child Matters’](#) website.

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10.0 Suspecting an incidence of harm and/or neglect

If at any time a team member, independent contractor, or board member suspects that child is experiencing harm and / or neglect, or there is a risk of harm to others, they should:

- call the Police if there is an immediate and/or serious risk of harm, or
- consult their manager (or the Quality Manager for Field Team members) and/or the Child Safeguarding Officer.

11.0 Allegations involving a team member, independent contractor, or Board member

All matters involving allegations of child abuse or neglect against a team member, independent contractor or Board member need to be escalated to a Manager and the Child Safeguarding Officer.

To ensure the child is kept safe, the Commission may take steps to remove the person whom an allegation has been made from the environment, subject to the requirements of the applicable individual or collective employment contract and relevant employment law, including the Commission's Workplace Integrity and Conduct Policy.

The Commission may consult with Oranga Tamariki and/or the Police before taking any further actions.

Our organisation commits not to use 'settlement agreements', where these are contrary to a culture of child protection. Some settlement agreements allow a team member to agree to resign provided that no disciplinary action is taken, and a future reference is agreed. Where the conduct at issue concerns the safety or wellbeing of a child, use of such agreements is contrary to a culture of child protection.

If the allegation is against the Child Safeguarding Officer, then the General Counsel should be notified instead of the Child Safeguarding Officer. The General Counsel should then perform all steps of the reporting process as if they were the Child Safeguarding Officer.

12.0 Confidentiality and information sharing

The person receiving a disclosure will remind children of the limits of confidentiality and explain how the child will be kept informed during the process.

In line with our privacy policies, only selected people, who need access to documentation relating to disclosures or suspected abuse, can access them. We follow our Privacy Policy in how we collect, handle, and share information related to disclosures.

13.0 Relevant Legislation & Related Policies

This policy should be read in conjunction with Te Tiriti o Waitangi, the Commission's Workplace Integrity and Conduct Policy, the Recruitment, Appointment and Induction Policy and the additional legislation and key supporting documents set out below:

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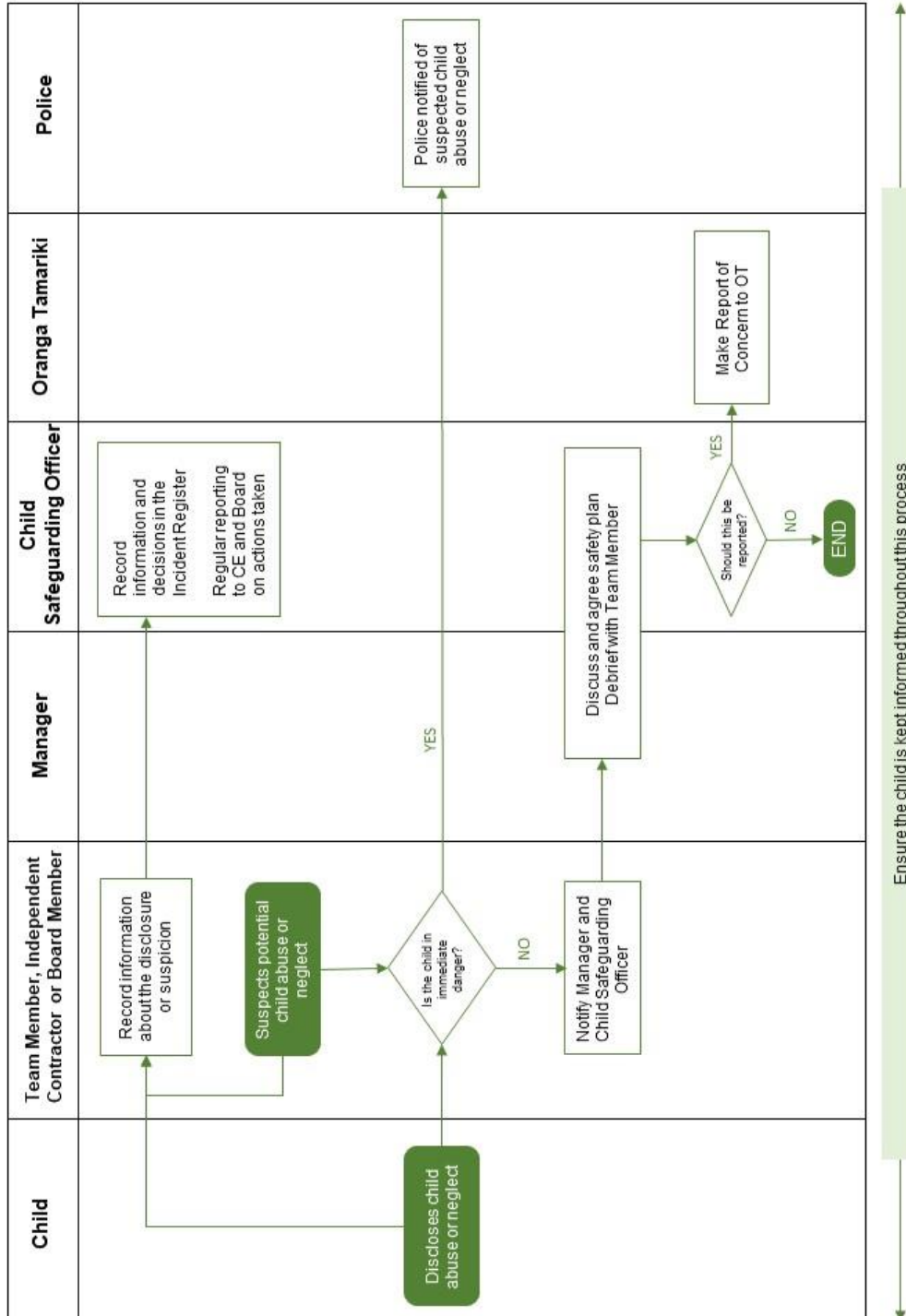
- United Nations Convention on the Rights of a Child
- Oranga Tamariki Act 1989
- Integrity Sport and Recreation Act 2023 and any integrity codes issued by the Commission pursuant to section 19 of that Act,
- Children’s Act 2014, and
- Commission policies, including Modifications for Minors & Athletes with Impairment (Sample Collection Manual).

The Recruitment, Appointment and Induction Policy sets out the working with children safety checks and training requirements for Commission team members.

14.0 Document Management & Control

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Appendix 1 – Roles and responsibilities in relation to the Child Protection Policy



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Appendix 2 – Process for responding to a disclosure

Step	Process
Listen to the child	Disclosures by children are often subtle and need to be handled with particular care, including an awareness of the cultural identity of the child and how that affects interpretation of their behaviour and language.
Protect and check for safety	<p>Checking if the child is safe, or whether the harm is still happening.</p> <ul style="list-style-type: none"> • Is the child in immediate danger? • Are they still experiencing this harm?
Reassure the child	<p>Reassurance might look like:</p> <ul style="list-style-type: none"> • Thanking the child for sharing their disclosure with you and acknowledge that it may have been difficult. • Letting them know they are not in trouble, and that they have done the right thing. • If the child is visibly distressed, providing appropriate reassurance. • Not asking questions beyond open prompts for the child to continue. <p>Do not make promises that can't be kept, e.g. <i>"I will keep you safe now"</i>.</p> <p>Informing the child of the limits of confidentiality and that you need to act on the information they have provided.</p>
Inform the child	<ul style="list-style-type: none"> • Explain to the child that we need to act on the information that has been provided. • Tell the child exactly what you are going to do and who you are going to talk to ensure they are fully informed and there are no surprises to them. • Explain who will be keeping them informed during the process.

When responding to disclosures, **do not**:

- Attempt to formally interview the child
- Ask leading questions
- Push for information or make assumptions
- Gather irrelevant or unnecessary facts
- Make assumptions, offer alternative explanations, or diminish the seriousness of the behaviour or alleged incidents
- Keep the information to yourself or promise confidentiality
- Take any action that might undermine future investigation or disciplinary procedure, such as interviewing the alleged victim or potential witnesses, or informing the alleged perpetrator or carers.
- Let personal doubt prevent you from debriefing with your manager.

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Appendix 3 – Process for reporting a disclosure generally across the Commission

When a child discloses an incidence of abuse or neglect, it is important that any information is recorded **accurately** and **promptly**.

For more detailed processes, refer to the guidance and induction material on Hono.

Step	Process
Record	Record at the time or as soon as possible after the disclosure is made: <ul style="list-style-type: none"> anything said by the child (in their words) the date, time, location, and the names of anyone that may be relevant (including alleged perpetrator/s) the factual concerns or observations that have led to the suspicion of abuse or neglect (e.g.any physical, behavioural, or developmental concerns) any other information that may be relevant.
Inform	Inform the Child Safeguarding Officer and your Manager of the disclosure and agree on a preliminary plan.
Communicate	Identify if the child has a trusted adult present and, if appropriate, inform the adult. If the child is in immediate danger, it may be appropriate to notify the Police. Discuss with the Child Safeguarding Officer. Police Phone: 111
Notify Oranga Tamariki	The Commission will need to determine if making a Report of Concern is the most appropriate course of action. This decision should be made in consultation with the Child Safeguarding Officer. A Report of Concern requires providing relevant information to the Oranga Tamariki National Contact Centre via email or phone so they can assess whether it meets the threshold for formal investigation and/or a referral to the Police. Oranga Tamariki contact details Phone: 0508 Family (0505 326 459) Lines are open 24/7. Email: Oranga Tamariki at contact@ot.govt.nz
Storing information	The following information must be recorded and stored securely in the Child Protection Incident Register: <ul style="list-style-type: none"> the date of engagement the date of the incident type of harm and a description as to its concern completed documentation

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	<ul style="list-style-type: none"> • a record of any advice received (including copies of correspondence received) • any action and the rationale for this by relevant organisation/s, including Mana Mokopuna • date which the concern was followed-up • outcome section (complete/follow-up required).
<p>Debrief and follow-up</p>	<p>As soon as possible after the disclosure (and no more than 7 days), the team member, manager, and Child Safeguarding Officer should discuss and reflect on the disclosure and reporting process, including:</p> <ul style="list-style-type: none"> • could the alleged abuse or neglect have been prevented? • was the process set out in this Policy effective and easy to follow? • what was the outcome (if known)? • did the child, and those involved (including the relevant team member), get support? • what actions are required to address identified gaps or issues in the Policy and processes? Who is responsible for these actions? <p>Further information on de-brief process is available on Hono.</p> <p>The Child Safeguarding Officer should confirm this process has been completed and record any actions (including who is responsible and when they will be completed) in the Child Protection Incident Register.</p>

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