



# Child Safe Action Plan 2025+

Providing a safe and inclusive environment for children within NSW.

## Message from the CEO

Participation in swimming provides immense benefits for children's physical and mental health. It builds essential social skills, and instils values such as resilience, determination and teamwork whilst keeping our children physically healthy. Learning to swim is not just a fundamental life skill but also a pathway to enjoying a lifelong connection with aquatic activities. Swimming offers children a fun and engaging way to stay active while promoting overall wellbeing.

In NSW, thousands of children participate in swimming each year, whether through learn-to-swim programs, club training, or competitive pathways. Many children swim multiple times a week, developing their skills in a safe and structured environment. The positive impact of swimming is maximised when it is delivered in a setting that prioritises care, inclusion, and safety.

Swimming NSW recognises the critical importance of safeguarding children. *The Royal Commission into Institutional Responses to Child Sexual Abuse* highlighted the lasting trauma that can result from failures in child safety policies and procedures. It is our duty to ensure that swimming remains a safe, supportive, and welcoming sport for all children.

The 10 Child Safe Standards recommended by the Royal Commission are now legislated in NSW, providing a strong framework for creating Child Safe Organisations. Swimming NSW is fully committed to embedding these standards into our policies, procedures, and culture. Our Child Safe Action Plan outlines the steps we will take to strengthen child safety across all levels of swimming, from grassroots programs to elite pathways.

As we move forward, we will continue to work closely with clubs, coaches, officials, volunteers, and the broader swimming community to uphold the highest standards of child safety. Together, we can build a swimming environment where every child feels protected, supported, and empowered to reach their full potential.

Swimming NSW will utilise the Australian Sports Commission (ASC) governance platform 'Game Plan' to support the implementation of the Child Safe Action Plan with SNSW clubs. The roll out of Game Plan will be aligned with Swimming Australia to provide a consistent and whole of sport approach to the introduction of Game Plan.

I look forward to working with you all in ensuring that swimming in NSW remains a safe and enjoyable experience for every child.

**Kirsten Thomson OLY**

**CEO, Swimming NSW**

<b>Business name</b>	Swimming NSW
<b>Nature of services / function</b>	<p>Swimming NSW's purpose is to operate as the administrative agency of swimming in NSW and the ACT. Our vision is to provide opportunities and pathways to enable everyone to enjoy swimming and develop the potential of all participants.</p> <p>Swimming is Australia's highest participation sport and is an activity synonymous with the Australian way of life.</p>
<b>Children definition.</b>	'Children' refers to all children and young people under the age of 18.
<b>Key risks in relation to child safety</b>	<p>There are several key risks that arise from the nature of swimming, including but not limited to:</p> <p>Child safe cultures and practices fail to gain traction due to competing priorities and high turnover of workers, including volunteers.</p> <p>Grooming – adult and child relationships in swimming provide opportunity for grooming.</p> <p>Close coaching relationships are common and can be exploited.</p> <p>High risk locations are common including overnight camps and the use of shared change rooms.</p> <p>Swimming is a sport largely delivered by volunteers e.g. club committees and technical officials.</p> <p>Communication to swimmers by coaches and others about physiological benchmarks of elite sport such as weight, skin folds and body shape and the psychological impact that has on the wellbeing of swimmers.</p> <p>Risk of inappropriate touching or physical handling during swimming instruction, coaching, or assisting children in the water.</p> <p>Potential for individuals with harmful intentions to have access to children if proper background checks and screening procedures are not in place.</p> <p>Private coaching sessions, travel to competitions, or secluded areas within facilities may create opportunities for misconduct or abuse.</p> <p>Verbal, emotional, or physical bullying from peers, including exclusion, which can occur both in-person and online.</p> <p>Inappropriate communication between adults and children via digital platforms, unauthorized sharing of images/videos, and cyberbullying</p> <p>Inadequate adult oversight during training sessions, competitions, or travel, leading to potential safety risks.</p> <p>Risk of individuals in positions of authority (e.g., coaches, officials) exploiting their influence over young swimmers</p> <p>Failure to create an environment where children feel safe to speak out and report abuse for fear of affecting their sport progression.</p> <p>Failure to train and educate staff in child safety standards and practices.</p>

<b>Key levers for change</b>	<p>Leadership</p> <p>Recruitment and induction</p> <p>Staff training and internal communications</p> <p>Club education and engagement</p> <p>Sector relationships (e.g. Office of Sport, Swim Aus, SCTA NSW)</p> <p>Child safe policies and procedures</p> <p>National Integrity Framework</p>
<b>Child Safe Policy</b>	<p>SNSW has adopted the Child Safe Policy developed by Sport Integrity Australia and Swimming Australia as part of the National Integrity Framework. Visit our <a href="#">Integrity</a> page for more information.</p>
<b>Relevant legislation</b>	<p><i>Children’s Guardian Act 2019 (NSW)</i> – creates the Child Safe Scheme through which SNSW must embed the Child Safe Standards. Also creates the Reportable Conduct Scheme that requires the SNSW Chief Executive Officer to report certain employee conduct to the Children’s Guardian.</p> <p><i>Child Protection (Working with Children) Act 2012</i> – requires SNSW employees that work with children to hold a Working with Children Check.</p> <p><i>Crimes Act 1900 (NSW)</i> – creates a criminal offence for adults not to report to police if they know, believe or reasonably ought to know that a child abuse offence has been committed. In addition, people employed in child-related work may be subject to a criminal offence if they fail to reduce or remove risk of a child becoming a victim of child abuse.</p> <p><i>Children and Young Persons (Care and Protection) Act 1998</i> - identifies some professional persons as Mandatory Reporters and requires them to report risk of serious harm to the Child Protection Helpline. At SNSW this would include those professionals providing health care to children e.g., Performance Psychologists, Physiotherapists, Medical Practitioners.</p>
<b>Collaboration</b>	<p>SNSW values the strong relationships that we share with partner organisations. We acknowledge the importance of working collaboratively to uphold the highest standards of child safeguarding across all levels of our sport.</p> <p>SNSW is actively engaged in child safety initiatives, with representation on both the NSW Sport and Recreation Sector Engagement Committee (Child Safe) and the Swimming Australia National Integrity Committee. These roles ensure that SNSW remains informed and aligned with best practices in child protection and integrity within the sport.</p> <p>The Office of the Children’s Guardian has a Child Safe Officer for the sport sector who can advise on implementation of the Child Safe Standards and review policies and procedures developed under the Child Safe Scheme.</p>
<b>Author</b>	Daniel Blattman, Chief Operating Officer
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## Child Safe Action Plan - Introduction

A key priority for Swimming NSW is to provide a safe and positive experience and the best possible outcomes for Children and young people swimming in NSW.

SNSW along with Swimming Australia has taken significant steps in our sport to keep children safe and we will continue to progress and improve our practices through our systems, policies, processes and education across the sport.

The SNSW Child Safe Implementation Plan operationalises elements of the Swimming Australia National Integrity Framework to strengthen the safety of children involved in our sport.

Our action plan will be publicly available on the SNSW website, and we will regularly provide updates on our progress.



## The Child Safe Standards

*The Children's Guardian Act 2019* creates the Child Safe Scheme. This requires sport and recreation organisations that provide services to children to implement ten Child Safe Standards. The Scheme commenced 1 February 2022). A graphic summary of the Standards is shown below, and more detail information is available at [Child Safe Standards](#).



### **STANDARD 1**

Child safety is embedded in organisational leadership, governance and culture



### **STANDARD 3**

Families and communities are informed and involved



### **STANDARD 4**

Equity is upheld and diverse needs are taken into account

### **STANDARD 2**

Children participate in decisions affecting them and are taken seriously



### **STANDARD 5**

People working with children are suitable and supported



### **STANDARD 6**

Processes to respond to complaints of child abuse are child focused



### **STANDARD 7**

Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training



### **STANDARD 8**

Physical and online environments minimise the opportunity for abuse to occur

### **STANDARD 9**

Implementation of the Child Safe Standards is continuously reviewed and improved



### **STANDARD 10**

Policies and procedures document how the organisation is child safe



## Self-Assessment Results – 2024/25

Swimming NSW undertook the following Office of Children’s Guardian (OCG) Child Safe Self-Assessment as part of our commitment to embedding strategies and embedding a culture of Child Safety in our sport.

The Self-Assessment provides a general indication of progress towards embedding the Child Safe Standards into practice at SNSW. The results of the Assessment indicate that SNSW is implementing Child Safe practices but there are areas to improve to better protect children.

### **SNSW is performing well in the areas of:**

- Standard 5: Human resource management
- Standard 6: Child-focused complaints process
- Standard 9: Continuous review and improvement.

### **SNSW priorities for improvement include:**

- Standard 3: Family and community involvement
- Standard 7: Training
- Standard 8: Physical and online environments.

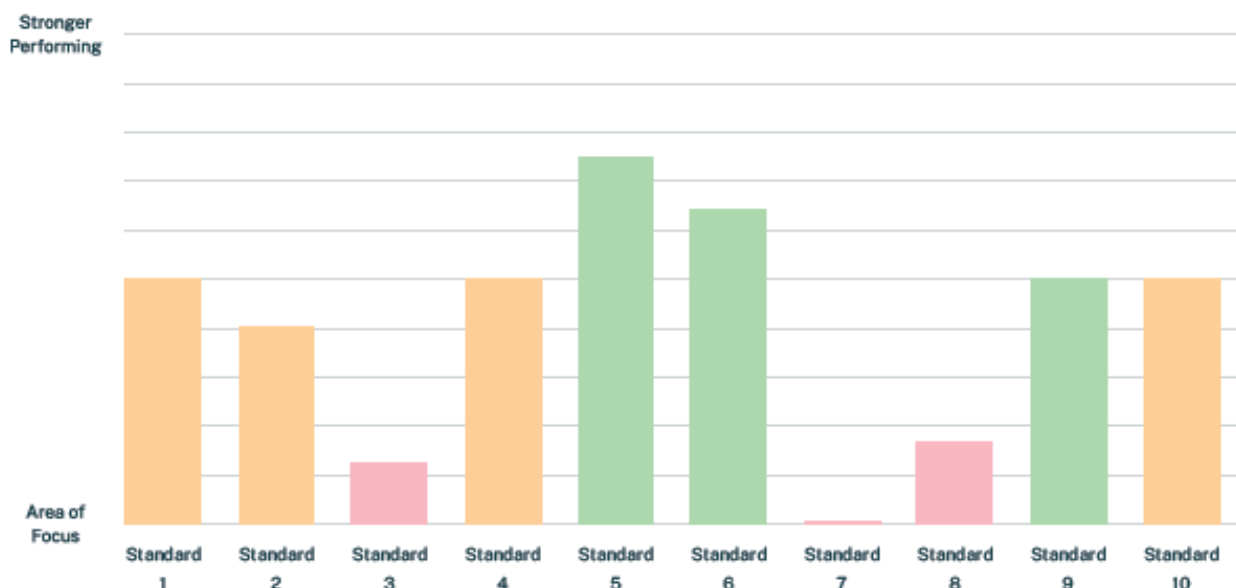
These are priority areas for improvement and are addressed in Child Safe Action plan outlined below.

SNSW will next undertake the Child Safe Assessment in September 2025 as part of the development of the 2026-2028 Business Plan to ensure our practices are embedded within our strategy.



# Your Child Safe Standards Progress

The below graph outlines your progress towards implementing each of the 10 Child Safe Standards, relative to other Standards, based on your responses to the Child Safe Self-Assessment. This is to assist with your implementation planning.



## Lower priority

### Your Strongest Performing

You scored highest in these three areas relative to other Standards, well done! Your responses to the self-assessment suggest that your organisation is doing more to implement these Standards than others.

- Standard 5: Human resource management
- Standard 6: Child-focused complaints process
- Standard 9: Continuous review and improvement

## Medium priority

### Your Moderate Performers

These were your middle four scores from the self-assessment. You are doing fairly well at implementing these Child Safe Standards compared to others.

- Standard 1: Leadership, culture, and governance
- Standard 2: Participation and empowerment
- Standard 4: Equity and diversity
- Standard 10: Policies and procedures

## Higher priority

### Your Areas of Focus

You scored the lowest in these three Child Safe Standards and can improve most in these areas compared to others. It is recommended that you prioritise the suggested actions in your action report for these Standards.

- Standard 3: Family and community involvement
- Standard 7: Training
- Standard 8: Physical and online environments



Swimming NSW Child Safe Action Plan						
	Date	April 2025				
Priority Level	Child Safe Standard	How we will meet this Standard	Actions		Timeline	
Medium	<b>1. Child safety is embedded in leadership, governance, and culture.</b>	Raise awareness and promote the Swimming Australia National Integrity Framework.	1. Resource links included for all members, clubs, and volunteers and as part of registration process – everyone is aware of expectations, standards and policies. 2. Promote National Integrity Framework via SNSW website, EDMs and social channels so members informed and aware of expectations.		1. Ongoing 2. Ongoing	
		SNSW identifies a dedicated Child Safe Officer.	1. COO as the point of contact to review child safety issues and report back to CEO, ARC and Board on the organisation's child safe performance. 2. Share information with staff and clubs about progress in child safe standards and provide ongoing education and training.		3. Completed 4. Ongoing	
		SNSW staff implement the National Integrity Framework across all activities.	5. Compulsory for all staff and touring team managers (build into pre tour requirements) to complete Sport Integrity Australia Child Safeguarding Course. 6. Aligned to the National Integrity Framework, SNSW Touring Team and Activities Guidelines are embedded in all Performance Pathways initiatives.		5. 2025 6. Ongoing	
		Child safety as a standing agenda item at Board and Executive Committee Meetings.	7. Add Child Safety to Board and Executive Committee agenda aligned with WHS reporting.		7. Completed	

		Working With Children Check (WWCC)	<p>8. Compulsory WWCC in place for coaches (via Swim Aus License), technical officials and support staff.</p> <p>9. Six monthly validation of WWCC status completed for all employed staff (and relevant casuals).</p> <p>10. Consider the regulations that apply to Technical Officers and implement accordingly.</p>	<p>8. Ongoing</p> <p>9. Ongoing</p> <p>10. 2025</p>	
		Accreditation at SNSW Events.	<p>11. Ensure all coaches, MC support people and staff have a valid accreditation before accessing pool deck during SNSW events.</p> <p>12. Work with SOPAC to ensure access is strictly limited to pool deck during SNSW events.</p>	<p>11. Ongoing</p> <p>12. Ongoing</p>	
		Integrate child safe communications into the SNSW Communications Plan to promote child safety.	<p>13. Position child safe visual communications, including the Responding to Child Abuse Allegations poster for staff in visible locations around the SNSW HQ.</p> <p>14. Celebrate and promote clubs and individuals who are leading the way in child safety e.g. regular Child Safety excellence awards via SNSW EDM.</p>	<p>13. 2025</p> <p>14. Ongoing</p>	
		Embed Child Safety education within staff onboarding.	<p>15. Update the SNSW staff handbook with National Integrity Framework information – implement a process for confirming all staff have read and understood.</p>	<p>15. 2025</p>	

Priority Level	Child Safe Standard	How we will meet this Standard		Actions	Timeline	
Medium	<b>2. Children participate in decisions affecting</b>	SNSW Youth Leadership Group provides opportunities for children and young people to share	16. Establish a Youth Leadership Group and embed the athlete voice in strategic decision making.		<p>16. 2025</p> <p>17. 2025</p> <p>18. Ongoing</p>	

	<b>them and are taken seriously.</b>	their views in SNSW decision making.	<p>17. Establish a 'Group Contract' for the Youth Leadership Group outlining how everyone will treat each other respectfully.</p> <p>18. Provide Children with mechanisms to raise concerns about their safety through promotion of the National Integrity Framework.</p>		
		Complaints, Disputes & Discipline Policy (CDDP).	<p>16. Promote suitable methods of reporting complaints for young people.</p> <p>17. The SNSW webpage provides resources and information relating to child safety and integrity so athletes can access them when needed.</p> <p>18. Utilise child safety FAQ to empower decision making and encourage clubs and Areas to take an active role in keeping children safe.</p>	<p>19. Ongoing</p> <p>20. 2025</p> <p>21. 2025</p>	
		Athlete wellbeing initiatives embedded within SNSW Performance & Pathways programs.	<p>19. Athlete wellbeing sessions delivered as part of P&amp;P pathways camps and training days (Futures and Sharks).</p>	<p>19. 2025</p>	
		Code of Conduct	<p>20. Utilise SIA content to develop a Professional Conduct information guide (how adults should behave) for staff and service providers.</p>	<p>20. 2025</p>	
		Regular member surveys to include Child Safety related questions.	<p>21. Inclusion of child safety related questions within member event, clinic and pathway surveys.</p> <p>22. Develop a survey template for clubs to check their child safe effectiveness (consider existing partner org surveys)</p>	<p>21. Ongoing</p> <p>22. 2025</p>	

Priority Level	Child Safe Standard	How we will meet this Standard		Actions	Timeline	
High	<b>3. Families and communities are informed and involved.</b>	Continue to embed National Integrity Framework in partnership with Swimming Australia	23.	Strengthen promotion of NIF and Child Safeguarding standards to members and encourage the Swim Aus Integrity Unit to develop new resources for clubs.	23. 2025	
			24.	Utilise expertise and resources developed by the OCG and sector wide working group.	24. Ongoing	
			25.	Promote to clubs Child Safe workshops delivered by OoS and SNSW Club Support webinars hosted by SNSW Club Support Officers.	25. Ongoing	
		MPIOs listed as a committee position on Swim Central and Club websites.	26.	All clubs to have a designated person in the MPIO role. Recommended recognised member of club hierarchy, rather than a non-committee member where possible.	26. 2025	
		Parent/guardians included on all swimmer correspondence.	27.	All communications to athletes under the age of 18 will ensure that parents/guardians are included in all correspondence (educate all staff).	27. Ongoing	
		Share relevant National Integrity Framework policies with members as they are updated.	28.	Relevant policies are shared with members and public via SNSW website.	28. Ongoing	
		Members invited to nominate for SNSW Committees and Boards.	29.	Nomination processes for Management Committees and SNSW Board are promoted publicly to encourage community voice in decision making.	29 Annual	
		Engage with members and Areas to support children and young people.	30.	Encourage members and Areas to complete the OoS Child Safety Survey to help shape child safe practices and awareness.	30. 2025	

Priority Level	Child Safe Standard	How we will meet this Standard		Actions	Timeline	
Medium	<b>4. Equity is upheld, and diverse needs are taken into account.</b>	Multi-class swimming and classification processes strengthened to encourage more swimmers with a disability to participate.	31.	Engage Swimming Australia, NSWIS Para Unit and Wheelchair Sports NSW to drive inclusion for athletes with a disability.	31 2026	
			32.	Investigate training day options to engage S15-19 (non-Paralympic disciplines) in SNSW Performance Pathway.	32 2026	
		Strengthen promotion and visibility of diversity weeks with Swimming in NSW/ACT.	33	Celebrate our diverse swimming community to encourage greater inclusion of children from diverse backgrounds.	33. Ongoing	
			34	Encourage Swim Aus to develop CALD resources and campaigns.	34. 2026	
			35	Consider community partnerships that engage diverse communities and demonstrate a commitment to inclusion.	35. 2026	
		Partner with the SNSW Participation Committee.	36.	Identify and develop D&I opportunities as part of the Participation Strategy development.	36. 2025	

	Child Safe Standard	How we will meet this Standard	Actions	Timeline	
Low	<b>5. People working with children are suitable and supported.</b>	Recruitment practices continue to prioritise child safety.	37. SNSW commitment to NIF and Child Safeguarding information included in job adverts and onboarding documents.	37. 2025	
		Support Swimming Australia Coach to embed the National Coaching Framework.	38. Share recruitment practices and resources with clubs, where applicable. 39. SNSW aligned with Swimming Australia Coach License Framework.	38. 2026	

Priority Level	Child Safe Standard	How we will meet this Standard	Actions	Timeline	
Low	<b>6. Processes to respond to complaints of child abuse are child focused.</b>	Develop a child friendly outline of relevant NIF documents (e.g. complaints)	40. Seek support from Swimming Australia to develop a child friendly overview and education materials of the complaints and safe guarding policies.	40. 2026	

Priority Level	Child Safe Standard	How we will meet this Standard	Actions	Timeline	
High	<b>7. Staff are equipped with the knowledge, skills, and awareness to keep children safe, through continual education and training.</b>	SNSW invests in building staff skills, abilities, and confidence in Child Safeguarding (complemented by Swim Aus Coach requirements).	41. All staff and coaches to complete the Sport Integrity Australia Child Safeguarding course (uploaded to Employment Hero). 42. All staff complete acknowledgement of SNSW onboarding, including all NIF Policies.	41. 2025 42. 2025	

Priority Level	Child Safe Standard	How we will meet this Standard	Actions	Timeline	
High	<b>8. Physical and online environments minimise the opportunity for abuse or other</b>	Separate change rooms for TOs/volunteers and athletes e.g. at SOPAC major events.	43. Provide clear signage and communication to relevant change rooms for athletes and volunteers at SNSW events. Examples of this signage with clubs as resources for their environments/events.	43. Ongoing	
		Athlete digital resilience education.	44. Engage Digital Resilience Experts to provide education to SNSW athletes, parents and	44. Annual	



	<b>kinds of harm to occur.</b>		members to assist with the risks online and creating online safe environments.		
		Teamworks App – Communication tool to foster clarity and trust among stakeholders.	45. Investigate the use of the Teamworks app for transparent communication with athletes and parents. If successful, promote the use of Teamworks app (or similar platform) to Clubs and Areas.	45. 2026	

Priority Level	Child Safe Standard	How we will meet this Standard	Actions	Timeline	
Low	<b>9. Implementation of the Child Safe Standards is continuously reviewed and improved.</b>	Ongoing reviews of child safe practice across the organisation	46. Executive Committee, Audit & Risk Committee and SNSW Board to review Child Safe Action Plan. 47. SNSW Executive Committee and staff review critical incidents to identify improvements. 48. Child safe action plan discussed with Youth Leadership Group annually. 49. Regularly communicate SNSW progress against Child Safe Standards.	46. 2026 47. Ongoing 48. 2026 49. Ongoing	

Priority Level	Child Safe Standard	How we will meet this Standard	Actions	Timeline	
Medium	<b>10. Policies and procedures document how the organisation is child safe.</b>	High risk activities identified and mitigated where possible.	48. Child safe risk assessment completed and added to corporate risk register.	48. 2026	
		NSW Touring Team & Activities Guidelines.	49. NSW Touring Team Guidelines shared with all athletes and staff attending NSW touring teams and pathways activities.  50. Investigate sharing these guidelines with clubs as a best practice example.	49. Ongoing 50. 2026	

