Child Safety and Wellbeing Policy

Purpose

Twistarz Gymnastics Pty Ltd (Twistarz) is committed to providing a safe, inclusive, respectful and positive environment in which every child and young person can participate in gymnastics, develop their skills and reach their potential.

This policy establishes Twistarz's approach to preventing harm, abuse, neglect, bullying, discrimination and other forms of inappropriate conduct involving children and young people.

The safety, wellbeing, dignity and rights of children take priority over sporting performance, reputation, convenience or financial considerations.

This policy applies to all activities conducted by or on behalf of Twistarz and is intended to guide everyday decisions, professional conduct, risk management and responses to concerns.

Scope

This policy applies to:

- All children and young people under 18 years of age participating in Twistarz activities.
- The company director and any other company officers.
- Employees, coaches, assistant coaches, casual staff and contractors.
- Volunteers, students and work-placement personnel.
- Parents, carers, spectators and other people attending Twistarz activities, where relevant to their conduct.
- Activities conducted at the gym, competitions, events, excursions, camps, training sessions and other activities organised or supported by Twistarz.
- Online communication, digital platforms, photography, video and social media associated with Twistarz.

Everyone within the scope of this policy is expected to act consistently with its principles and the relevant codes of conduct and safeguarding requirements.

Our child-safety commitment

Twistarz will:

1. Put children's safety, wellbeing and best interests first.
2. Respect children's rights, dignity, individuality and developing autonomy.
3. Listen to children and take their views, experiences and concerns seriously.
4. Provide safe, appropriately supervised training and participation environments.
5. Engage suitable people to work with children and ensure required screening and training are completed.

6. Promote inclusion, equity, accessibility and cultural safety.
7. Prevent and respond to abuse, neglect, grooming, bullying, harassment, discrimination and inappropriate conduct.
8. Make it easy for children, families and staff to raise concerns.
9. Respond promptly, fairly and appropriately to concerns and complaints.
10. Review our practices regularly and make improvements when risks or gaps are identified.

Twistarz does not tolerate behaviour that compromises a child's safety or wellbeing.

Governance and safeguarding responsibilities

Twistarz is a Pty Ltd company. Safeguarding responsibilities are assigned to designated people within the business and do not require a separate not-for-profit committee.

Safeguarding

At Twistarz, the safety and wellbeing of children and young people is our highest priority.

We are committed to providing a safe, inclusive, and supportive environment where all players, coaches, volunteers, and families feel respected and protected.

Our commitment includes:

- *Following **Gymnastics Queensland and Gymnastics Australia's Safeguarding Policies** and **Queensland Working with Children (Blue Card) Services** requirements.*
- *Ensuring all coaches, officials, and volunteers hold a valid Blue Card and receive regular safeguarding training.*
- *Promoting a culture where concerns can be raised safely, listened to, and acted upon in confidence.*
- *Taking all concerns about child safety seriously and responding in line with best practice and legal requirements.*
- *Actively creating an environment where children and young people can thrive, learn, and enjoy gymnastics free from harm.*

Safeguarding is everyone's responsibility. Together, we can ensure our club is a safe place for all.

Company Director/Owner

The company director/owner retains overall responsibility for ensuring that Twistarz establishes, implements and reviews appropriate child-safety arrangements.

Responsibilities include:

- Ensuring the business understands and meets applicable legal obligations and Gymnastics Australia and Gymnastics Queensland affiliation requirements.
- Approving and supporting implementation of this policy and associated procedures.
- Ensuring appropriate resources, staffing, supervision and safeguarding systems are in place.
- Ensuring required screening, registration, accreditation and training are completed and maintained.
-
-

-
- Ensuring risks are identified, documented, managed and reviewed.
- Supporting the Child Safe Representative to carry out their responsibilities.
- Ensuring concerns are acted on promptly and that external reporting obligations are met.
- Taking appropriate action when conduct breaches this policy.

These responsibilities remain with the company even when specific tasks are delegated.

Designated Child Safe Representative

Twistarz will appoint at least one staff member as its **Child Safe Representative**, consistent with applicable Gymnastics Australia affiliation standards.

The representative's name and contact details will be made available to staff, families and gymnasts in an accessible format.

Responsibilities include:

- Being an accessible contact for children, parents, carers, staff and volunteers who have concerns.
- Helping children and families understand how to speak up.
- Receiving and documenting concerns and complaints.
- Promptly escalating concerns to the company director/owner or an appropriate external authority, as required.
- Supporting the implementation and review of safeguarding procedures.
- Helping coordinate safeguarding education, training and awareness.

  Monitoring relevant screening and training requirements, where delegated.

  Maintaining appropriate, confidential records of safeguarding matters.

  Identifying risks and recommending improvements.

The Child Safe Representative is not expected to investigate criminal allegations or determine whether abuse has occurred. Concerns must be referred to the appropriate authority where required.

Alternative reporting contact: Emma McComb If

a child is in immediate danger, call **000**.

Coaches, employees, contractors and volunteers

All personnel must:

- Follow this policy and relevant codes of conduct.
- Maintain appropriate professional boundaries.
- Provide safe, respectful and appropriately supervised activities.
- Complete applicable screening, accreditation and training requirements.
- Listen to children and respond respectfully to concerns.
- Report suspected abuse, harm, grooming or inappropriate conduct through the appropriate pathways.
- Cooperate with legitimate safeguarding processes.
-
-

- Never retaliate against a person who raises a concern in good faith.

Safeguarding is everyone's responsibility; it is not the sole responsibility of the designated representative.

Children's participation, rights and voice

Twistarz recognises that children have a right to participate in decisions affecting their safety and wellbeing.

We will:

- Explain children's rights and the behaviour they can expect from adults in age-appropriate language.
- Encourage children to speak up if something makes them feel unsafe, uncomfortable, excluded or worried.
- Take concerns seriously, even when a child struggles to explain what has happened.
- Give children appropriate opportunities to express their views about training, coaching, inclusion and safety.
- Consider children's developmental stage, communication needs, disability, cultural background and individual circumstances.
- Explain, as far as appropriate, what will happen after a concern is raised.

Children will not be blamed, punished or disadvantaged for raising a concern.

Code of conduct and professional boundaries

All adults involved with Twistarz must behave respectfully and maintain appropriate boundaries with children.

Expected conduct

Adults must:

Treat children with dignity, fairness and respect.

Use positive, developmentally appropriate coaching and communication.

-
-

- Provide feedback that supports learning without humiliation or intimidation.
- Respect privacy, personal boundaries and bodily autonomy.
- Use appropriate supervision and follow approved safety procedures.
- Maintain transparent and professional communication.
- Obtain appropriate consent before physical assistance, while recognising that necessary spotting and safety support may be part of gymnastics coaching.
- Respond appropriately to disclosures, concerns and observed warning signs.

Unacceptable conduct

The following are prohibited:

- Physical, sexual, emotional or psychological abuse.
- Grooming, exploitation or sexualised behaviour towards a child.
- Bullying, harassment, discrimination, humiliation or threats.
- Corporal punishment or the use of physical force as discipline.
- Inappropriate physical contact or contact that is not necessary, explained or consistent with safe coaching.
- Unnecessary exposure of a child's body or intrusion into their privacy.
- Favouritism, secrecy or relationships that blur professional boundaries.
- Inappropriate private contact with children through social media, messaging or other digital channels.
- Taking, storing or sharing images of children without appropriate authorisation.
- Being under the influence of alcohol or drugs while responsible for supervising children.
- Retaliating against a child, family member or staff member who raises a concern.

Breaches may result in removal from duties, disciplinary action, termination of engagement or referral to the relevant sporting, regulatory or law-enforcement authority, as appropriate.

Recruitment, screening and suitability

Twistarz will take reasonable steps to ensure that people engaged to work with children are suitable, appropriately qualified and supported.

This includes, as applicable:

- Checking identity, qualifications, coaching accreditation and relevant experience.
- Obtaining and verifying references.
- Completing required Queensland Blue Card screening or confirming a valid exemption, where legally applicable.
- Linking relevant Blue Card holders to Twistarz through Blue Card Services where required.
- Ensuring coaches and judges meet applicable Gymnastics Australia membership, registration and accreditation requirements.
-
-

- Checking relevant restrictions, suspensions or prohibitions where permitted and appropriate.

  Explaining safeguarding expectations before work or volunteering begins.

  Maintaining records of relevant checks, expiry dates, training and accreditation.

No person will be permitted to undertake regulated child-related work where they are legally prohibited from doing so.

Screening requirements will be reviewed whenever a person's role or responsibilities change and in response to relevant changes in law or affiliation requirements.

Safe coaching, supervision and physical environments

Twistarz will assess and manage risks associated with its facilities, activities and coaching practices.

Training and supervision Twistarz will:

- Maintain appropriate supervision for the age, ability, activity and number of gymnasts.
- Ensure coaches have the relevant competence and accreditation for the activities they supervise.
- Maintain safe equipment and training areas and address identified hazards promptly.
- Establish procedures for injuries, emergencies, missing children and significant incidents.
- Ensure children are not left in situations where supervision is inadequate.
- Provide clear arrangements for arrival, collection and late collection.
- Consider additional supervision and support where a child's needs or circumstances require it.

One-to-one coaching and physical assistance

Individual coaching, spotting or other necessary physical assistance must be conducted in a safe, transparent and professionally appropriate manner.

Where practicable, one-to-one interactions should occur in observable environments. Any additional supervision or consent requirements under applicable sporting policies must be followed.

Toilets and change rooms

Twistarz will respect children's privacy and dignity while managing foreseeable risks in toilets and change rooms.

Adults must not engage in inappropriate conduct in these spaces, photograph or film children, or enter or remain in change areas with children except where permitted and necessary for a legitimate safeguarding or assistance purpose.

Any assistance must be appropriate to the child's age and needs, consistent with relevant policies, and transparent.

Online safety, photography and communication

Twistarz will take reasonable steps to ensure online and digital environments are safe and respectful.

- Parents/carers will be informed about photography and filming arrangements.
- Appropriate consent and permissions must be obtained before images or recordings are taken or published, in accordance with applicable law and sporting policies.
- Children's privacy, dignity and preferences will be respected.
- Images must not be inappropriate, exploitative or unnecessarily revealing.
- Personal devices and accounts must be used consistently with Twistarz's privacy and safeguarding procedures.

- Communication between adults and children must remain professional, transparent and consistent with applicable Gymnastics Australia policies.

  Concerns about cyberbullying, inappropriate messages, image-sharing or online grooming must be reported and addressed.

Twistarz will provide clear guidance about approved communication channels and expectations for coaches, children and families.

Inclusion, equity and cultural safety

Twistarz is committed to an inclusive environment in which every child is welcomed, valued and respected.

We will work to prevent discrimination or exclusion on the basis of disability, sex, gender identity, sexual orientation, ethnicity, cultural background, faith, socioeconomic circumstances or other personal characteristics.

We recognise the continuing connection of Aboriginal and Torres Strait Islander peoples to Country, culture and community. Twistarz will promote cultural safety and respect for Aboriginal and Torres Strait Islander children, families and communities.

Reasonable adjustments and additional support will be considered where needed to support safe and meaningful participation.

Concerns about discrimination, exclusion, harassment or culturally unsafe behaviour will be taken seriously and addressed through the relevant reporting and complaints processes.

Raising and responding to concerns

Children, parents, carers, staff, volunteers and other members of the Twistarz community are encouraged to report concerns about a child's safety or wellbeing.

A person does not need to be certain that something is wrong before raising a concern.

Concerns may include:

- Suspected abuse, neglect or grooming.
- Inappropriate physical contact or boundary violations.
- Bullying, harassment, discrimination or intimidation.
- Unsafe supervision or coaching practices.
- Inappropriate online contact, photography or sharing of images.
- Breaches of this policy or relevant sporting requirements.
- Any other conduct that may place a child at risk.

How to report a concern

Concerns may be raised with:

Child Safe Representative: Helen Nicoll

Company Director/Owner: Emma McComb

Where the concern involves a person listed above, use another reporting pathway. Concerns may also be reported directly to the relevant external authority.

-

-

Responding to a disclosure from a child

Anyone receiving a disclosure should:

1. Listen calmly and take the child seriously.
2. Reassure the child that speaking up was the right thing to do.
3. Avoid leading questions or conducting their own investigation.

4. Never promise to keep the information secret; explain that it may need to be shared with people who can help keep them safe.
5. Record the child's words as accurately as possible, together with the date, time and relevant observations.
6. Report the concern promptly through the appropriate internal and/or external pathway.
7. Take immediate steps to protect the child from further harm, without compromising an external investigation.

Where immediate danger exists, call **000**. Where criminal conduct or a child protection concern may be involved, contact the appropriate authorities and follow applicable reporting obligations.

Internal reporting does not replace any personal legal obligation to report.

Managing complaints, incidents and allegations

Twistarz will respond to complaints and incidents in a child-focused, timely, fair and appropriate manner.

The response will include, as relevant:

- Assessing immediate safety and taking protective action.
- Identifying any conflicts of interest and using an independent pathway where necessary.
- Recording the concern and actions taken.
- Referring matters to Gymnastics Queensland, Gymnastics Australia, police, child protection or another relevant authority when required.
- Cooperating with external investigations or formal processes.
- Maintaining appropriate confidentiality.
- Providing appropriate support to the child and family.
- Taking proportionate action to address substantiated breaches and prevent recurrence.

Twistarz will not attempt to manage serious allegations solely as an internal matter where referral or external investigation is required. Any internal process must not compromise a police, child protection or sporting integrity investigation.

Privacy, confidentiality and recordkeeping

Safeguarding information will be handled sensitively and shared only with people who need it for a legitimate safety, reporting, legal or procedural purpose.

Twistarz will:

- Keep accurate records of concerns, incidents, actions and outcomes.
- Store safeguarding records securely with access restricted to authorised people.
- Retain records in accordance with applicable legal, privacy, insurance and sporting requirements.
- Avoid unnecessary duplication or informal circulation of sensitive information.
- Protect the privacy of children and families to the extent possible while meeting safeguarding and reporting obligations.

Confidentiality must never be used to prevent appropriate reporting or to conceal a risk to a child.

Training and awareness

Twistarz will ensure that relevant personnel understand their safeguarding responsibilities.

This includes:

- Induction on this policy and applicable codes of conduct.
- Information about recognising and reporting concerns.
- Required Blue Card and screening processes.
- Required Gymnastics Australia integrity training, including the annual training requirements applicable to the Child Safe Representative, coaches and judges.
- Relevant coaching, supervision, online safety and professional-boundary guidance.
- Updates when policies, legal requirements or identified risks change.

Twistarz will maintain records of required training and follow up outstanding requirements.

Risk management and continuous improvement

Twistarz will maintain a documented approach to identifying, assessing and managing child-safety risks.

Risk assessment will consider, as relevant:

- Coaching and spotting practices.
- Supervision and one-to-one interactions.
- Toilets, change rooms and other less observable spaces.
- Recruitment, screening and training.
- Bullying, discrimination and exclusion.
- Photography, digital communication and social media.
- Transport, competitions, excursions and overnight activities.
- Physical facilities, equipment and emergency procedures.
- Individual support needs and accessibility.
- Complaints, incidents and feedback from children and families.

Identified risks will be assigned appropriate actions and reviewed when circumstances change or an incident occurs.

Twistarz will seek feedback from children, families and personnel and use it to improve safeguarding practices.

Related policies and documents

This policy should be read alongside the current versions of:

- Twistarz General Membership Terms and Conditions.
- Twistarz Student and Parent Code of Conduct.
- Gymnastics Australia Child Safeguarding Policy and other applicable integrity policies.
- Gymnastics Australia and Gymnastics Queensland affiliation standards and requirements.
- Applicable Queensland child-safety, Blue Card, privacy and child protection legislation.

Where requirements differ, Twistarz will seek appropriate advice and follow the applicable legal and sporting requirements.

Sanctions for non-compliance

1. Failure to adhere to any aspect of this policy may constitute a breach of the Twistarz Gymnastics Academy Code of Conduct, the Twistarz Gymnastics Academy Employment Contract, and any other code/policy that details behavioural expectations and may result in disciplinary action that could include termination of employment.
2. Failure to adhere to relevant Working with Children or Vulnerable People Assessments and mandatory reporting legislation requirements may result in penalties to Twistarz Gymnastics Academy and the employee(s), as well as the potential of criminal charges.
3. Any incidences of non-compliance should be referred to Twistarz Gymnastics Academy Integrity Manager in the first instance.

Related Documents:

- Codes of Conduct
- Child Safe Reporting Policy:
  — tracking minor breaches and recording them in your organisation — external reporting obligations
- Child Safe Risk Management Plan (CSRMP)
- WWCC Checklist and Framework
- National Integrity Framework Policies
- GA Child Safeguarding Policy

Related legislation, regulations, and standards

Include legislation relevant to the work undertaken in your organisation. It may include:

- *Children's Guardian Act 2019*
- *Child Protection (Working with Children) Act 2012*
- *Child Protection (Working with Children) Regulation 2013*
- *Children and Young Persons (Care and Protection) Act 1998*
- *Crimes Act 1900*
- *Children and Young Persons (Care and Protection) Regulation 2012*
- *Children and Young Persons (Care and Protection) (Child Employment) Regulation 2015*
- *Disability Inclusion Act 2014* • *Anti-Discrimination Act 1977* Standards may include:
- United Nations Convention of the Rights of the Child
- Child Safe Standards

Publication

- This Policy will be available on the Twistarz Gymnastics Academy website and will be provided to staff upon employment and referred to in relevant staff meetings and public meetings as well as during induction and training.
- This policy is effective from 01 April 2026 and will be reviewed annually.

Review and approval

The Company Director/Owner is responsible for ensuring this policy is reviewed at least annually and whenever there is a significant change in legislation, affiliation requirements, business operations or safeguarding risks.

The Child Safe Representative will assist with the review and recommend improvements.

All relevant personnel will be informed of significant changes, and the current policy will be made accessible to families and the Twistarz community.

Document details:

Policy Owner: Emma McComb
Document Status: Final
Policy Owner: Emma McComb
Designated Child Safety Representative: Helen Nicoll
Point of Contact: Emma McComb
Approver: Emma McComb
Date of Approval: 28 October 2026
Date of Review: 15 January 2027

Appendix A

Glossary of Terms/Definitions

Term	Defini*on
Child or children	Child or children In Accordance with the United Nations Convention on the Rights of the Child, child means any human under the age of 18 years.
Child Exploita1on	One or more of the following: a) committing or coercing another person to commit an act or acts of abuse against a child b) possessing, controlling, producing, distributing, obtaining, or transmitting child exploitation material c) committing or coercing another person to commit an act or acts of grooming or online grooming d) d) using a minor for profit, labour, sexual gratification, or some other form of personal or financial advantage.
Child Protec1on	An activity or initiative designed to protect children from any form of harm, particularly that arising from child exploitation and abuse.
Child-related work	Means being engaged in: a. work activities where contact (physical, face-to-face, oral, written, or electronic contact) between a staff member and a child would reasonably be expected as a normal part of the work and such contact is not occasional (infrequently or irregularly) and incidental (occurring by chance) to the work, or b. work that requires a Working with Children Check (WWCC) in the state or territory jurisdiction in which the work is being undertaken.
Child safe posi1on	A Twistarz Gymnastics Academy position that has been identified as having contact with a child as a normal part of work activities (that is, child-related work), and therefore is required to obtain and maintain a Working with Children Check in order to be engaged in that position.
Contractor	The individuals engaged to perform temporary services for which: a. the output is being produced on behalf of Twistarz Gymnastics Academy b. the services are performed under the direction or supervision of Twistarz Gymnastics Academy c. remuneration is based on time worked, usually calculated on an hourly rate.
Emo1onal abuse	Emotional abuse: A parent or caregiver's inappropriate verbal or symbolic acts towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability. Such acts of commission or omission are likely to damage a child's self-esteem or social competence.
Neglect	Neglect: The failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for the physical and emotional development and wellbeing of the child.

Physical abuse	The use of physical force against a child that results in harm for the child's health, survival, development, or dignity. This includes hitting, beating, kicking, shaking, biting, strangling, scalding, burning, poisoning, and suffocating.
Policy non-compliance	The failure to abide by Twistarz Gymnastics Academy's policy.
Sexual abuse	Sexual abuse: The use of a child for sexual gratification by an older or significantly older child, adolescent, or adult.
Staff	Staff are either employed by an organisation, engaged by an organisation on a subcontract basis, or engaged by an organisation on a voluntary or unpaid basis, staff can include paid staff, volunteers, interns, trainees, and consultants
Working with Children	Being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. This includes volunteering or other unpaid work
Working with Children Check	An assessment of whether a person poses an unacceptable risk to children. As part of this process, the applicant's criminal history, child protection information and other information is checked. A Working with Children Check may also be known under other names, such as a Working with Vulnerable People Check, a Blue Card, Working with Children Clearance, etc.