



HARNESS RACING VICTORIA

# Child Safe Complaints Handling Procedure

Approved by:		Date of Approval	
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Version Number	Date Effective	Description	
1	08 Aug 2022	New Edition	
2			
3			
4			
5			
6			



# Child Safe Complaints Handling Procedure

LRC-PR-009  
(08 Aug 2022)

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## 1. PURPOSE

The purpose of this procedure is to set out the principles that Harness Racing Victoria (HRV) has adopted for the management of complaints or concerns received in relation to allegations of child abuse and harm.

This procedure describes the complaint handling process mentioned in the Child Safety and Wellbeing Procedure and should be read in conjunction with that document.

## 2. SCOPE

This procedure applies to all staff- including employees and contractors(Staff), volunteers, child safe office members, children and their families and any other individuals involved with HRV.

## 3. DEFINITIONS

Refer to section 3: Definitions of Child Safety and Wellbeing Procedure.

## 4. RESPONSIBILITIES

Refer to section 4: Responsibilities of Child Safety and Wellbeing Procedure.

## 5. COMPLAINTS MANAGEMENT

HRV is committed to promoting and protecting the interests, safety, and wellbeing of children, and creating a culture that encourages feedback and complaints.

### 5.1. Who can make a complaint?

A Parent/Carer/Guardian, child, Staff, volunteers, Participants, contractors, or a member of the public. Complaints or concerns can also be raised by families, staff, volunteers, or other children on behalf of an alleged victim.

### 5.2. What can complaints be about?

Any complaints or concerns involving children, including:

- HRV's services or dealings with children;
- Allegations of abuse or harm by a staff member, a volunteer or another individual associated with the organisation;
- Disclosures of abuse or harm made by a child;
- Conduct of a child;
- The inadequate handling of a prior concern;
- General concerns about the safety of a group of children or activity;
- Breaches of HRV's Child Safe Code of Conduct.



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### 5.3. How to make a complaint?

- In Person to a HRV Representative
- Phone - 03 9214 0660
- Email - [childsafefoffice@hrv.org.au](mailto:childsafefoffice@hrv.org.au)

Refer to **Appendix A: Resources for Children and Families** for an easy-to-understand Flowchart on Child Safety Reporting Process and Children's Rights poster.

### 5.4. How HRV responds to a complaint or concern?

HRV takes a trauma informed approach to handling complaints, so that children, families, staff, volunteers, and anyone involved participates in the complaints and investigation process without causing further trauma.

#### Step 1: Receiving a complaint

- If the complaint was initiated by a child/young person, they will be asked:
  - What would make them feel safe;
  - How involved the child wants to be in the complaints process;
  - The extent to which they want their parent/carer/ guardian to be part of decisions.
- The disclosure will be dealt with sensitivity by HRV staff and volunteers;
- HRV Staff and Volunteers are also trained in identifying indicators of child abuse or harm, helping them be proactive and reduce reliance on children to disclose abuse.

#### Step 2: Recording the complaint

- **HRV staff/volunteers who receives the disclosure must report to HRV's ChildSafe Office immediately.**
- The complaint is recorded in the Child Safety Complaints Register along with other records so that there is a full account of how the issue arose. For more information, refer to section 6 Records of the Child Safety and Wellbeing Procedure.

#### Step 3: Initial Response and Risk Assessment

Depending on the nature and seriousness of the complaint or safety concern, HRV will take the following immediate actions:

- Administering first aid and/or calling 000 for an ambulance and following any instructions from emergency service officers/paramedics (where required);
- Calling 000 for urgent Victoria Police assistance for concerns that are life threatening or posing an immediate risk to the health and safety of anyone;
- Informing the child's parents and carers about the complaint or safety concern, unless the disclosure is related to abuse within the family;
- Considering if evidence needs to be immediately secured (for example, CCTV footage, emails, downloads) to preserve any future investigation;

To manage further risks that could be posed by the subject of allegation, HRV will take immediate action(s) such as:

- Restricting/not permitting the subject of allegation to have contact with children;
- Altering their duties.



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### Step 4: Reporting

HRV's Child Safe Office shall report the incident to the following external authorities:

- **Victoria Police:** If there is an alleged or suspected criminal conduct that involves any of the following:
  - Imminent or immediate danger;
  - Physical or sexual abuse;
  - Family violence, whether or not a child has been physically or sexually abused.
- **Child Protection / Commission for Children and Young People(CCYP):** HRV is not obligated to report to Child Protection (as per [Mandatory reporting obligation](#)) or CCYP (as per [Reportable Conduct Scheme](#)). However, if reasonable belief is formed that a child has suffered or is likely to suffer significant harm as a result of abuse or neglect and their parent has not or is unlikely to protect them from harm of that type, then HRV will contact [Department of Families, Fairness and Housing \(DFFH\) Child protection](#).  
**Child Protection Emergency After Hours Service Number - 13 12 78.**

### Step 5: Providing ongoing support

HRV shall offer support to children and/or their families by making referrals to recognised support services which may include those listed below, after discussing this with the children and/or their families:

- Family services through [The Orange Door](#);
- Organisations specialising in supporting victims of abuse and complex trauma such as [Blue Knot](#) and [Centres Against Sexual Assault](#);
- [Victims of Crime Helpline](#);
- Telephone and online support services like [Lifeline Australia](#), [Kids Help Line](#), [headspace](#) and [Beyond Blue](#).

When a complaint is raised against an employee or a volunteer, the investigation shall be undertaken in accordance with employment law obligations. Counselling and wellbeing support via Employee and Industry Assistance Program currently provided by Benestar is also available to staff and volunteers who are the subject of an allegation or are part of the complaints process.

### Step 6: Investigation

If HRV has made a report to Victoria Police or Child Protection, no investigation shall be undertaken without consulting these authorities, due to the risk of negatively impacting future police action or putting the child at risk. However, HRV shall cooperate with Police, or Child Protection, in providing support and assistance to identify and contact witnesses and gather or retain evidence. Consultation/Interviews may be conducted by HRV (in addition to interviews from police and/or child protection) with the intent to hear from the child directly and to help make them feel safe. During the investigation:

- Care will be taken to provide the child with information suitable to their age or level of comprehension;
- Reasonable adjustments such as access to interpreters will be provided to children and their parents/carers to help them fully participate in the complaints process;



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- All parties will be treated fairly and provided opportunities to express their views and given timely update of the investigation.

### Step 7: Outcomes and sharing information.

- Outcome of the investigation, including decisions reached in relation to the investigation and resolution, and the action taken, will be communicated to all relevant parties, considering privacy and confidentiality requirements;
- If the complainant or the subject of the complaint is not happy with the outcome or handling of the complaint:
  - They can request for an Internal review by contacting HRV's CEO directly in writing, addressed to: CEO, Harness Racing Victoria, PO Box 184 Moonee Ponds 3039;
  - Proceed for External review: Children and/or families can contact [CCYP](#) for reviewing complaints and overseeing the handling of allegations of reportable conduct.

### 6. RECORDS

Refer to section 6 of the Child Safety and Wellbeing Procedure.

### 7. REVIEW

Refer Section 7 of the Child Safety and Wellbeing Procedure.

### 8. RELATED SYSTEM DOCUMENTS

Access to any of the references below shall be via the HRV intranet, manager, or supervisor in accordance with the Document Control Procedure.

- Child Safety and Wellbeing Procedure
- Child Safe Code of Conduct
- Performance, Conduct and Disciplinary Procedure

### 9. REFERENCES

- [Complaint handling guide](#)
- [Fair Work Ombudsman](#)
- [Including children and young people in investigations](#)
- [Benestar | EAP, Critical Incident Response, Organisational Development services](#)
- [Mandatory reporting - DFFH Service Providers](#)
- [Reportable Conduct Scheme](#)

### 10. AUDITABLE OUTPUTS

The following examples of records will be used to verify implementation of this procedure:

- Electronic/hardcopy complaints/ Investigation reports
- Communication/Evidences
- Complaints register

## Appendix A: Resources for Children and Families

### Appendix A1: Flowchart: Child Safety Reporting Process for Children and Families



## Appendix A2: Children's Rights Poster



As a Child Safe Organisation, HRV has the responsibility to keep you safe, and you have the right to be and feel safe. Say NO to below actions and speak up if you experience, witness, or are aware of any such actions.

- Sexual Offence
- Sexual Misconduct
- Neglect
- Physical Violence (e.g: hitting, pushing, punching)
- Emotional/Psychological Violence (e.g Verbal abuse, humiliation, rejection)

You can raise a concern, give feedback, opinion, or complaint by:

- Talking to one of Our Staff, or Volunteers;
- Completing a Child Safety Feedback Form [online](#) or using the QR form (For general concerns/feedback)



- E-mailing: [childsafefice@hrv.org.au](mailto:childsafefice@hrv.org.au) (For serious child abuse/harm)

More information on Child Sexual Abuse Prevention can be found in:

- [A guide for children and young people to the National Strategy to prevent child sexual abuse \(2021\) | Australian Human Rights Commission](#)
- [Keeping Kids Safe Resources | The Daniel Morcombe Foundation](#)
- [Young People | eSafety Commissioner](#)
- [Child sexual grooming: spotting the signs | Raising Children Network](#)