



Bowls New South Wales Ltd

Member Protection Policy

1. Preface

- a. Bowls NSW Ltd (BNSW) is the peak body for the administration of the sport of lawn bowls in New South Wales. One of the objects for which BNSW has been established is to encourage, conduct and promote all forms of the sport of lawn bowls throughout New South Wales.
- b. BNSW is committed to the safety and well-being of all its Members and those who play lawn bowls throughout New South Wales. BNSW is also committed to ensure that all participants in the sport are treated fairly, equally and are all given an equal opportunity to participate in the sport.
- c. The value to all participants in the sport of regular exercise together with social interaction provided in a club environment is paramount to the objectives of BNSW. Unfortunately, harassment can dramatically underline these benefits of participation in lawn bowls. Depending on the particular case, harassment or abuse can have devastating effects not only for an individual but for a club and even an association in the form of potential legal liability, low morale, a reluctance of people to be involved both as players and volunteers and long-term damage to an organisation's reputation.
- d. The BNSW Constitution is authorised to adopt appropriate policies relevant to the administration of the sport in New South Wales. This policy reflects the high priority which BNSW places on serving and protecting its members and all participants in the sport – both bowlers and non-bowlers alike.
- e. The policy binds BNSW Members as defined in the Constitution. All Members must comply with this policy.
- f. District and Zone Associations and Member Clubs may make their own rules or policies in relation to matters covered by this policy provided that such rules or policies are consistent with this policy and do not contravene any state or federal legislation or statutory rules. This policy must be read in the context of the BNSW Constitution, General Code of Conduct and any other policies made by BNSW from time to time. If there is any conflict or ambiguity between this policy and the Constitution, Code of Conduct or any other BNSW policy the conflicting documents must be read in such a way as to achieve the objects of BNSW, that is promoting and encouraging participation, and the opportunity to participate in the sport of lawn bowls.
- g. It is intended that this policy is implemented and observed not only by BNSW Members but also all organisations and individuals associated within New South Wales including but not limited to bowls clubs, members of committees or other management bodies of Members, employees, contractors, sub-contractors and agents of members, volunteers and honorary workers, players, coaches and administrators.
- h. Whilst BNSW is ultimately responsible for achieving the objectives of this policy the implementation of it cannot be achieved without the active participation and adherence to this policy by BNSW Members and all other organisations and persons to whom the policy is directed.
- i. BNSW commends this policy to all Members, participants, and prospective participants in the sport. Together we can ensure the safety and well-being of all concerned and continue to promote and develop the sport we all love.

2. Introduction

2.1. What is the purpose of this policy?

- a. The purpose of this policy is to protect the health, safety and well-being of all Members of BNSW, and all those who participate in the sport of lawn bowls, both bowlers and non-bowlers alike.
- b. BNSW is committed to providing a safe environment for all participants, that is free from harassment, abuse and other unfair treatment and promotes respectful and positive behaviour towards everybody.
- c. For that reason, the policy provides the basis for appropriate and ethical conduct and all those involved in the sport of lawn bowls must comply with these principles and the specific requirements of this policy. The policy aims to ensure that the core values, good reputation and positive behaviour that BNSW values is always maintained. It assists in ensuring that every person involved in the sport is treated with respect and dignity and is safe and protected from abuse or other inappropriate behaviour. The policy also ensures that everyone involved in the sport is aware of their legal and ethical rights and responsibilities.
- d. The policy will provide the procedures that support the commitment of BNSW to eliminating discrimination, harassment, child abuse and other forms of inappropriate behaviour from the sport. As part of this commitment, BNSW will take disciplinary action against any person or organisation who is bound by this policy if BNSW considers such person or organisation is in breach of this policy.
- e. The policy has been endorsed by the Board of BNSW commencing from 20 October 2021 and will operate until replaced. The policy and/or its attachment may be amended from time to time by a resolution of the Board. Copies of the policy and its attachments can be obtained from the BNSW website www.bowlsnsw.com.au or from the BNSW office.



Bowls New South Wales Ltd

Member Protection Policy

2.2. What does this policy cover?

In summary, this policy sets out the following ways BNSW and its Members seek to fulfil the purposes set out in Clause 1 as follows:

- a. BNSW and its Members must screen preferred applicants and existing appointees in certain roles, particularly any role dealing with children or vulnerable people, and highly recommended screening for other types of roles;
- b. BNSW and its Members must promote and distribute this policy and enforce and recognise any penalties or other sanctions imposed pursuant to this policy;
- c. All coaches, umpires, administrators, other officials, volunteers, players and parents/guardians are bound by the BNSW General Code of Conduct;
- d. The policy provides a process for making a complaint concerning a possible breach of the policy including a process for investigating such possible breach and determining, by way of hearing or otherwise, whether such a breach has occurred and an appropriate appeal process.
- e. Breaches of this policy are outlined in Clause 7 of this policy.

2.3. Who does this policy apply to?

This policy fully applies to the following organisations and individuals whether they are in a paid, unpaid or voluntary capacity:

- a. Individuals sitting on boards, committees and sub-committees including but not limited to office bearers of BNSW, affiliated District or Zone Associations and Member Clubs.
- b. Employees of BNSW, affiliated District or Zone Associations and Member Clubs.
- c. Officials appointed or elected by BNSW, affiliated District or Zone Associations and Member Clubs.
- d. Clubs or other bodies affiliated with Member Clubs in relation to players or teams which represent such organisations including but not limited to team managers, coaches, physiotherapists, psychologists, masseurs and sports trainers;
- e. Coaches and assistant coaches appointed and/or employed by BNSW, affiliated District or Zone Associations and Member Clubs;
- f. Referees, Umpires and other officials involved in the regulation of the game of lawn bowls;
- g. Any player who enters any tournament, activity or event (including camps and training sessions) which are hosted, organised or sanctioned by BNSW, affiliated District or Zone Associations and Member Clubs.
- h. Individual Members, including Life Members;
- i. A Member Club;
- j. An affiliated District or Zone Association;
- k. Any other person or organisation that is a Member of or affiliated with a Member;
- l. Parents, guardians, spectators and sponsors of BNSW, affiliated District or Zone Associations, Member Clubs and Individual Members.

This policy will continue to apply to a person or entity even after they have stopped their association, affiliation or employment with BNSW, if disciplinary action against them has commenced.

3. General Code of Conduct

BNSW requires every individual and organisation bound by this Policy to:

- a. Be ethical, fair and honest in all their dealings with other people;
- b. Treat all persons with respect and courtesy and have proper regard for another person's dignity, rights and obligations, regardless of gender, ability, cultural background or religion;
- c. Always place the safety and welfare of children above other considerations and adopt appropriate and responsible behaviour in any interactions with children.
- d. Comply with the BNSW Constitution, Regulations and policies including this Member Protection Policy;
- e. Operate within the Laws of the Sport as well as the spirit of the sport;
- f. Comply with all relevant laws (Federal and State), particularly any discrimination and child protection laws;
- g. Act with integrity and be responsible and accountable for their conduct;
- h. Not tolerate, encourage or condone any harmful or abusive behaviours;
- i. Abide by the relevant Role-Specific Codes of Conduct outlined in Part D of this policy.

4. Individual and Organisational Responsibilities

4.1. BNSW, Member Clubs and affiliated Districts and Zones must:

- a. Adopt, implement and comply with this policy;
- b. Publish, distribute and otherwise promote this policy and the consequences of breaching it;
- c. Promote appropriate standards of conduct at all times;
- d. Promptly deal with any breaches of or complaints made under this policy in an impartial, sensitive, fair, timely and confidential manner;
- e. Apply this policy consistently;
- f. Recognise and enforce any penalty or other sanction imposed under this policy;
- g. Ensure that a copy of this policy is available or accessible to the persons to whom the policy applies;
- h. Appoint or have access to appropriately trained people to receive and handle complaints and allegations and display the names and contact details of such person or persons in a way that is readily accessible; and
- i. Monitor and review this policy at least annually.

4.2. Individuals bound by this policy must:

- a. Make themselves aware of the policy and comply with the standards of conduct outlined in it;
- b. Comply with all relevant provisions of this policy, including any codes of conduct and the steps for making a complaint or reporting possible child abuse as set out in this policy;
- c. Consent to the screening requirements set out in this policy and NSW Working with Children Checks if the person holds or applies for a role that involves regular unsupervised contact with a child or young person under the age of 18 or where otherwise required by law
- d. Place the safety and welfare of children above other considerations
- e. Be accountable for their own behaviour; and
- f. Comply with any decisions and/or disciplinary measures imposed under this policy

5. Policy Position Statements

5.1. Child Protection Policy

- a. Every person and organisation bound by this policy must always place the safety and welfare of children above all other considerations.
- b. BNSW acknowledges that staff and volunteers provide a valuable contribution to the positive experiences of junior members under the age of 18 years and aims to ensure this continues and to protect the safety and welfare of junior members. Several measures will be used to achieve this such as:
 - i. Prohibiting any form of abuse against children;
 - ii. Providing opportunities for junior members to contribute to and provide feedback on our program development;
 - iii. Ensuring that our organisation engages suitable and appropriate people to work with children, especially those in positions that involve regular unsupervised contact with children.
 - iv. Ensuring that a Working with Children Check is conducted for all employees and volunteers working in a position identified as child-related, and where an assessment is required by law. If a criminal history report is obtained as part of their screening process, we will handle this information confidentially and in accordance with the relevant legal requirements.
 - v. Ensuring codes of conduct, particularly for roles associated with junior sport, are promoted, enforced and reviewed annually;
 - vi. Providing procedures for raising concerns or complaints (complaints procedure is outlined in Part C of this policy); and
 - vii. Providing education and/or information to those involved in our sport on child abuse and child protection.
- c. Child Abuse is a criminal offence. BNSW requires that any child who is abused or anyone who reasonably suspects that a child has been or is being abused by someone within the sport, to report it immediately to the police or relevant government agency and the BNSW Chief Executive Officer. Descriptions of activities which may be abuse are in the Dictionary at Clause 9.
- d. All allegations of child abuse will be dealt with promptly, seriously, sensitively and confidentially. A person will not be victimised for reporting an allegation of child abuse and the privacy of all persons concerned will be respected. BNSW procedures for handling allegations of child abuse are outlined in Attachment C4 of this policy.

- e. Further, if any person believes that another person or organisation bound by this policy is acting inappropriately towards a child, or is in breach of this policy, they may make an internal complaint to us. Refer to the attachments in Part E of this policy

5.2. Taking images of children

- a. There is a risk that images of children may be used inappropriately or illegally. BNSW requires that individuals and associations, wherever possible, obtain permission from a child's parent/guardian before taking an image of a child that is not their own. They should also make sure the parent/guardian understands how the image will be used.
- b. To respect people's privacy, we do not allow camera phones, videos and cameras to be used inside changing areas, showers and toilets which we control or are used in connection with our sport.
- c. When using a photo of a child, we will not name or identify the child or publish personal information, such as residential address, email address or telephone number without the consent of the child's parent/guardian. We will not provide information about a child's hobbies, interests, school or the like, as this can be used by pedophiles or other persons to "groom" a child.
- d. We will only use images of children that are relevant to our sport and we will ensure that they are suitably clothed in a manner that promotes participation in the sport. We will seek permission from the parents/guardians of the children before using the images. We require our member associations and clubs to do likewise.

5.3. Anti-Discrimination and Harassment

- a. BNSW aims to provide a sporting environment where all those involved in its activities are treated with dignity and respect, and without harassment or discrimination.
- b. BNSW recognises that all those involved in its activities cannot enjoy themselves, perform to their best, or be effective or fully productive if they are being treated unfairly, discriminated against or harassed because of their gender identity, marital status, pregnancy, parental status, race, age, disability, sexuality, religion, political belief and/or industrial activity.
- c. BNSW prohibits all forms of harassment and discrimination not only because it is against the law, but because it is extremely distressing, offensive, humiliating and/or threatening and creates an uncomfortable and unpleasant environment.
- d. Descriptions of some of the types of behaviour which could be regarded as harassment or discrimination are provided in the Dictionary at Clause 9.
- e. If any person feels they are being harassed or discriminated against by another person or organisation bound by this policy, please refer to our complaints procedure outlined in Attachment C of this policy.

5.4. Coach/Athlete Relationship

- a. BNSW understands that consensual intimate relationships (including, but not limited to sexual relationships) between coaches or officials and adult athletes may take place legally. However, this policy will help ensure that the expectations of coaches or officials are clear and, to ensure that if an intimate relationship does exist or develop between a coach or official and an adult athlete, that relationship will be managed in an appropriate manner.
- b. Coaches and officials are required to conduct themselves in a professional and appropriate manner in all interactions with athletes. In particular, they must ensure that they treat athletes in a respectful and fair manner, and that they do not engage in sexual harassment, bullying, favouritism or exploitation.
- c. BNSW takes the position that consensual intimate relationships between coaches or officials and the adult athletes they coach should be avoided as they can have harmful effects on the athlete involved, on other athletes and coaches and on the sport's public image. These relationships can also be perceived to be exploitative due to the differences in authority, power, maturity, status, influence and dependence between the coach or official and the athlete.
- d. BNSW recommends that if an athlete attempts to initiate an intimate relationship with a coach or official, the coach or official should discourage the athlete's approach and explain to the athlete why such a relationship is not appropriate.
- e. If a consensual intimate relationship does exist or develop between an adult athlete and a coach or official, the coach or official is expected to ensure that the relationship is appropriate and that it does not compromise impartiality, professional standards or the relationship of trust the coach or official has with the athlete and/or other athletes.
- f. In assessing the appropriateness of an intimate relationship between a coach or official and an adult athlete, relevant factors include, but are not limited to:
 - i. the relative age and social maturity of the athlete;
 - ii. any potential vulnerability of the athlete;
 - iii. any financial or emotional dependence of the athlete on the coach or official;
 - iv. the ability of the coach or official to influence the progress, outcomes or progression of the athlete's performance and/

Bowls New South Wales Ltd

Member Protection Policy

- or career;
- v. the extent of power imbalance between the athlete and coach or official;
- vi. the likelihood of the relationship having an adverse impact on the athlete and/or other athletes.
- g. It will often be difficult for a coach or official involved in an intimate relationship with an adult athlete to make an objective assessment of its appropriateness and accordingly they are encouraged to seek advice from a MPIO or the CEO to ensure that they have not involved themselves in inappropriate or unprofessional conduct.
- h. Should it be determined that an intimate relationship between a coach or official and an adult athlete is inappropriate or unprofessional, BNSW may take disciplinary action against the coach or official up to and including dismissal.
- i. Action may also be taken to stop the coaching relationship with the athlete. This could include a transfer, a request for resignation or dismissal from coaching duties.
- j. Should a coach, official or athlete believe they are being, or have been, harassed they are encouraged to seek information and support from a MPIO or the BNSW CEO. Our complaints procedure is outlined in Part C of this policy.

5.5. Gender Identity

- a. BNSW acknowledges and is committed to the principles of anti-discrimination laws throughout New South Wales which prohibit discrimination against or among people on the basis of their sex or gender identity.
- b. For the purposes of this policy the phrase 'gender identity' includes the gender-related identity, appearance, mannerisms or other gender related characteristics of a person.
- c. Some terms used to describe a person's gender identity include trans, transgender and gender diverse. This includes any person who has or is in the process of changing their gender identity or who identifies with a gender that is different to their birth gender regardless of whether such person has undergone or is undergoing gender reassignment surgery and includes persons who are of indeterminable sex.
- d. Participation by a transgender or gender diverse person in the sport of lawn bowls must be dealt with in accordance with this policy.
- e. The fundamental principle upon which this policy is based and upon which it must be implemented is that no Member may discriminate against a transgender or gender diverse person in relation to that person's participation or opportunity to participate in sport of lawn bowls.
- f. Notwithstanding anything contained in the previous paragraph:
 - i. BNSW or Member Clubs shall ensure that their Members, employees, or agents must not require that any person undergo any medical test to ascertain their gender at birth.
 - ii. Any transgender person eligible to be an individual members shall be permitted to play lawn bowls as their reassigned gender in any game played under a Controlling Body as that phrase is defined in the Laws of the Sport of Bowls in Australia.
 - iii. Members shall always respect the privacy of a transgender person and comply with all relevant privacy legislation in force in New South Wales.
 - iv. Members shall have or establish a procedure for dealing with grievances, complaints or other matters arising under or in relation to this policy that protects the privacy of individuals and is the same as or substantially the same as the procedures under this policy.
 - v. Members must not victimise a person or permit the victimisation of any person to occur or to continue after it becomes known by another person who makes a complaint or raises a grievance under this policy. For the purposes of this policy, victimisation means treating a person unfairly because that person or someone with whom they associate has or intended to make a complaint or lodge a grievance under this policy. In addition to this policy, victimisation is also unlawful under all anti-discrimination laws enforced in New South Wales.

5.6. Smoke-free greens policy

- a. BNSW is committed to providing a safe and healthy environment at all sporting and social events that we hold or endorse.
- b. All information is outlined in the 'BNSW Smoke Free Greens Policy'.



Bowls New South Wales Ltd

Member Protection Policy

5.7. Social Media Policy

- a. BNSW acknowledges the enormous value of social media to promote, communicate and celebrate the achievements and success of the people involved in our sport.
- b. Social media refers to any interactive website or technology that enables people to communicate and/or share content via the internet.
- c. We expect all people bound by this policy to conduct themselves appropriately when using social media to share information related to our sport.
- d. Social media activity including, but not limited to postings, blogs, status updates and tweets:
 - i. must not contain material which is, or has the potential to be, offensive, aggressive, defamatory, threatening, discriminatory, obscene, profane, harassing, embarrassing, intimidating, sexually explicit, bullying, hateful, racist, sexist or otherwise inappropriate;
 - ii. must not contain material which is inaccurate, misleading or fraudulent;
 - iii. must not contain material which is in breach of laws, court orders, undertakings or contracts;
 - iv. should respect and maintain the privacy of others; and
- e. The BNSW policy is outlined in the BNSW Social Media Policy.

5.8. Abusive Behaviour towards Staff or Officials

- a. BNSW takes a 'zero-tolerance' approach to any abusive or inappropriate behaviour towards employees or officials.
- b. This includes, but is not limited to face-to-face interactions, phone calls, emails, online comments, and any form of social media.
- c. BNSW respects the rights of any member to express their opinions and we always encourage individuals to direct their queries or concerns to the relevant BNSW contact in an appropriate manner.
- d. BNSW reserves the right to take any action it deems necessary towards an individual found to be in breach of this policy.

6. Complaints

6.1. Complaints Procedure

- a. BNSW aims to provide an easy to use, confidential and trustworthy procedure for complaints based on the principles of natural justice.
- b. Any person may seek information, advice, raise a concern or report a complaint (complainant) in relation to inappropriate behaviour of a person/s or organisation bound by this policy if they reasonably believe that a person/s or sporting organisation has breached this policy.
- c. Any such contact should first be made with a Member Protection Information Officer (MPIO) at the level at which the breach occurred. In the case of an MPIO not being available at that level, other first options may include a Club President, General Manager or other person of authority.
- d. A complaint may be reported as an informal or formal complaint. The complainant decides whether the complaint will be dealt with informally or formally unless the MPIO considers after first discussing it with the complainant that the complaint falls outside the parameters of this policy and would be better dealt with another way.
- e. All complaints will be dealt with promptly, seriously, sensitively and confidentially. Our complaint procedures are outlined in Attachment C of this policy.

6.2. Vexatious Complaints & Victimisation

- a. BNSW aims to ensure this complaints procedure has integrity and is free of unfair repercussions or victimisation. If at any point in the complaint process an MPIO or the CEO considers that a complainant has knowingly made an untrue complaint or the complaint is vexatious or malicious, the matter may be referred to the BNSW Board for appropriate action which may include disciplinary action against the complainant.
- b. BNSW will take all necessary steps to make sure that people involved in a complaint are not victimised by anyone for coming forward with a complaint or for helping to resolve the issue. Disciplinary measures will be imposed on anyone who victimises another person for making a complaint.

6.3. Mediation

- a. BNSW aims to resolve complaints in the most efficient manner possible. In many cases, complaints can be resolved by agreement between the people involved with no need for disciplinary action. The people involved in a formal complaint - the complainant and the person complained about (respondent) - may also seek the assistance of a neutral third party or a mediator. A legally trained or qualified person (e.g a solicitor or barrister) is not able to negotiate on behalf of the complainant and/or respondent but all parties may have one support person present with them throughout the mediation, provided that the support person is not legally trained.
- b. Mediation may occur either before or after an investigation of a complaint. If a complainant wishes to try and resolve the complaint with the assistance of a mediator, the BNSW Chief Executive Officer will, in consultation with the complainant, arrange for a mediator to mediate the complaint. More information on the mediation process is outlined in Attachment C of this policy.

6.4. Tribunal Hearings

- a. A Tribunal may be formed to hear a formal complaint that has been referred by the BNSW Chief Executive Officer, for an alleged breach of the policy.
- b. BNSW Tribunal hearing process is outlined in Attachment C5 of this policy.
- c. The Tribunal shall be appointed by the Board and comprise of no less than three (3) members.
- d. A respondent may lodge one appeal only to the Board in respect of a decision of a Tribunal hearing. The decision of the Board is final and binding on the people involved in the appeal. Our appeals process is outlined in Attachment C of this policy.
- e. Every organisation bound by this policy will recognise and enforce any decision made, and form of discipline imposed, by the Hearing Tribunal or the Board under this policy.
- f. Members of a Tribunal and Board will be indemnified by the organisation that appointed them against any claim for loss, compensation or damages, and for costs incurred defending a claim made against them, because of their function as a member of a Tribunal or Board.

7. What Constitutes a Breach of this Policy

It is a breach of this policy for any person or organisation to which this policy applies, to have been found to have:

- a. Done anything contrary to this policy;
- b. Breached the General Code of Conduct and/or Role-Specific Codes of Conduct;
- c. Brought the sport and/or BNSW into disrepute;
- d. Failed to follow BNSW policies and procedures for the protection, safety and welfare of children;
- e. Appointed or continued to appoint a person to a role that involves working with children and young people contrary to this policy;
- f. Discriminated against or harassed any person;
- g. Victimised another person for reporting a complaint;
- h. Verbally or physically assaulted another person, intimidated another person or created a hostile environment within the sport;
- i. Engaged in any abusive or harassing behaviour towards a BNSW employee or official;
- j. Engaged in a sexually inappropriate relationship with a person that the person supervises, or has influence, authority or power over;
- k. Disclosed to any unauthorised person or organisation any BNSW information that is of a private, confidential or privileged nature;
- l. Made a complaint they knew to be untrue, vexatious, malicious or improper;
- m. Failed to follow the principles of natural justice in the course of disciplinary proceedings;
- n. Failed to comply with a penalty imposed after a finding that the individual or organisation has breached this policy;
- o. Failed to comply with a direction given to the individual or organisation during the discipline process.

8. Disciplinary Measures

- a. BNSW may impose disciplinary measures on an individual or organisation for a breach of this policy.
- b. Any disciplinary measure imposed will be:
 - i. fair and reasonable
 - ii. applied consistent with any contractual and employment rules and requirements



Bowls New South Wales Ltd

Member Protection Policy

- iii. be based on the evidence and information presented and the seriousness of the breach and
- iv. be determined in accordance with our constituent documents, by-laws, this policy and/or the rules of the sport.

8.1. Individual

Subject to contractual and employment requirements, if a finding is made by a Hearing Tribunal that an individual has breached this policy, Clause 1 of the Disciplinary Policy (Attachment C6) applies.

8.2. Organisation

If a finding is made by a Hearing Tribunal that a Member Club or affiliated District or Zone Association has breached this Policy, disciplinary action may be imposed as set out under Clause 2 of the Disciplinary Policy (Attachment C6) and in conjunction with Clause 10 of the Constitution.

8.3. Factors to consider

The form of discipline to be imposed on an individual or organisation will depend on factors, such as:

- i. the nature and seriousness of the breach
- ii. if the person knew, or should have known, that the behaviour was a breach of the policy
- iii. the person's level of contrition
- iv. the effect of the proposed disciplinary measures on the individual or organisation, including any personal, professional or financial consequences
- v. if there have been any relevant prior warnings or disciplinary action
- vi. the ability to enforce disciplinary measures if the person is a parent or spectator (even if they are bound by the policy)
- vii. any other mitigating circumstances.

9. Dictionary

This Dictionary sets out the meaning of words used in this policy and its attachments without limiting the ordinary and natural meaning of the words. State/Territory specific definitions and more detail on some of the words in this dictionary can be sourced from the relevant State/Territory child protection commissions or equal opportunity and anti-discrimination commissions.

Abuse is a form of harassment and includes physical abuse, emotional abuse, sexual abuse, neglect, and abuse of power. Examples of abusive behaviour include bullying, humiliation, verbal abuse and insults.

Child means a person who is under the age of 18 years (see also definition of young person).

Child abuse relates to children at risk of harm (usually by adults, sometimes by other children) and often by those they know and trust. It can take many forms. Children may be harmed by both verbal and physical actions and by people failing to provide them with basic care. Child abuse may include:

- Physical abuse by hurting a child or a child's development (e.g. hitting, shaking or other physical harm; giving a child alcohol or drugs; giving bad nutritional advice; or training that exceeds the child's development or maturity).
- Sexual abuse by adults or other children where a child is encouraged or forced to watch or engage in sexual activity or where a child is subject to any other inappropriate conduct of a sexual nature (e.g. sexual intercourse, masturbation, oral sex, pornography including child pornography or inappropriate touching or conversations).
- Emotional abuse by ill-treating a child (e.g. humiliation, taunting, sarcasm, yelling, negative criticism, name calling, ignoring or placing unrealistic expectations on a child).
- Neglect (e.g. failing to give food, water, shelter or clothing or to protect a child from danger or foreseeable risk of harm or injury).

Complaint means a complaint made under Clause C of this policy.

Complainant means the person making a complaint.



Bowls New South Wales Ltd

Member Protection Policy

Discrimination means treating or proposing to treat a person less favourably than someone else in certain areas of public life on the basis of an attribute or personal characteristic they have. Relevant attributes or characteristics include:

- Age;
- Disability;
- Marital status;
- Parental/carer status;
- Physical features;
- Political belief/activity;
- Pregnancy;
- Race;
- Religious belief/activity;
- Gender identity;
- Sexual orientation;
- Trade union membership/activity;

Discrimination is not permitted in the areas of employment (including volunteer and unpaid employment); the provision of goods and services; the selection or otherwise of any person for competition or a team (domestic or international); the entry or otherwise of any player or other person to any competition; obtaining or retaining membership of an organisation (including the rights and privileges of membership).

Requesting, assisting, instructing, inducing or encouraging another person to engage in discrimination may also be discriminatory conduct.

Discrimination may be direct or indirect. **Direct discrimination** is treating, or proposing to treat someone less favourably, because of a characteristic (such as race, sex, age etc), in the same or similar circumstances. **Indirect discrimination** is imposing or intending to impose a requirement, condition or practice that is the same for everyone but which has an unequal or disproportionate effect on particular individuals or groups.

Harassment is any type of behaviour that the other person does not want and does not return and that is offensive, abusive, belittling or threatening. The behaviour is unwelcome and of a type that a reasonable person would recognise as being unwelcome and likely to cause the recipient to feel offended, humiliated, or intimidated.

Unlawful harassment includes the above but is either sexual or targets a person because of their race, sex, pregnancy, marital status, sexuality or other characteristic (see characteristic list under discrimination).

Whether or not the behaviour is harassment is determined from the point of view of the person receiving the harassment. The basic rule is if someone else finds it harassing then it could be harassment. Harassment may be a single incident or repeated. It may be explicit or implicit, verbal or non-verbal.

Junior means a person under the age of eighteen (18) years who is participating in an activity of BNSW or a Member Club.

Mediator means a person appointed to mediate complaints made under this policy. It is preferable that the mediator has relevant skills, qualifications and/or training in mediation.

Member Club means an organisation as defined in the BNSW Constitution.

Member protection is a term used by the Australian sport industry to describe the practices and procedures that protect members – both individual members such as players, coaches and officials, and the member organisations such as clubs, state associations, other affiliated associations and the national body. Member protection involves:

- protecting those that are involved in sport activities from harassment, abuse, discrimination and other forms of inappropriate behaviour
- adopting appropriate measures to ensure the right people are involved in an organisation, particularly in relation to those involved with juniors, and
- providing education.

Natural justice incorporates the following principles:

- a person who is the subject of a complaint must be fully informed of the allegations against them
- a person who is the subject of a complaint must be given full opportunity to respond to the allegations and raise any matters in their own defense
- all parties need to be heard and all relevant submissions considered



Bowls New South Wales Ltd

Member Protection Policy

- irrelevant matters should not be considered
- no person may judge their own case
- the decision maker/s must be unbiased, fair and just
- the penalties imposed must not outweigh the 'crime'

Police check means a national criminal history record check conducted as a prudent pre-employment or pre-engagement background check on a person.

Policy and **this policy** mean this Member Protection Policy.

Respondent means the person who is being complained about.

Role-specific codes of conduct means standards of conduct required of certain roles (e.g. coaches).

Sexual harassment means unwanted, unwelcome or uninvited behaviour of a sexual nature which makes a person feel humiliated, intimidated or offended. Sexual harassment can take many different forms and may include unwanted physical contact, verbal comments, jokes, propositions, display of pornographic or offensive material or other behaviour that creates a sexually hostile environment.

Sexual harassment is not behaviour based on mutual attraction, friendship and respect. If the interaction is between consenting adults, it is not sexual harassment.

Sexual offence means a criminal offence involving sexual activity or acts of indecency including but not limited to (due to differences under state/territory legislation):

- Rape
- Indecent assault
- Sexual assault
- Assault with intent to have sexual intercourse
- Incest
- Sexual penetration of child under the age of 16
- Indecent act with child under the age of 16
- Sexual relationship with child under the age of 16
- Sexual offences against people with impaired mental functioning
- Abduction and detention
- Procuring sexual penetration by threats or fraud
- Procuring sexual penetration of child under the age of 16
- Bestiality
- Soliciting acts of sexual penetration or indecent acts
- Promoting or engaging in acts of child prostitution
- Obtaining benefits from child prostitution
- Possession of child pornography
- Publishing child pornography and indecent articles.

Victimisation means subjecting a person or threatening to subject a person to any detriment or unfair treatment because that person has or intends to pursue their rights to make a complaint under government legislation (e.g. anti-discrimination) or under this policy, or for supporting another person to make a complaint.

Vilification involves a person or organisation doing public acts to incite hatred towards, serious contempt for, or severe ridicule of a person or group of persons having any of the attributes or characteristics within the meaning of discrimination. Public acts that may amount to vilification include any form of communication to the public and any conduct observable by the public.

Young People/person means people in the 13 – 18 year age group.



Bowls New South Wales Ltd

Member Protection Policy

PART B

Bowls New South Wales Child Protection Requirements

Background

Child protection is about keeping children safe from abuse and protecting them from people who are unsuitable to work with children. Child abuse is illegal in New South Wales.

In New South Wales child protection legislation places specific requirements upon individuals and organisations involved in a range of areas including sport and recreation. The New South Wales Government is currently developing child protection legislation that will also impact upon sport. We will add these new requirements or any amendments to existing requirements to our Member Protection Policy as they are introduced.

Please be aware that state child protection requirements also apply to individuals and organisations originating outside of the states with the legislation in place. For example, if one of our state associations or affiliated clubs takes junior players to New South Wales or Queensland for training camps, competition or other activities, those travelling with the teams must comply with the NSW or QLD legislative requirements.

As part of the commitment to protecting the safety and welfare of children and young people involved in BNSW activities, BNSW requires the following measures to be met for junior programs;

- Provide opportunities for juniors to contribute to and provide feedback on program development;
- Provide education and/or information on child abuse and child protection to those involved in our sport such as coaches, juniors, parents and officials; and
- Meet the requirements outlined in Attachment B1



Bowls New South Wales Ltd

Member Protection Policy

Attachment B1

New South Wales Requirements For Checking People To Work With Children

This information is subject to change at any time. Refer to the NSW Office of the Children's Guardian website: www.ocg.nsw.gov.au

All NSW clubs and associations who engage/employ people in child-related activities (in a paid or voluntary capacity) must meet the requirements of the Working With Children Check. This is a legal requirement. We are required to:

1. Register with the NSW Office of Children's Guardian as an employer in child-related work.
2. Identify positions (paid and voluntary) which are child-related positions;
3. Verify clearances for any person holding a position identified as child-related within the organisation.
4. Include advice about the Working With Children Check in information being provided about child-related positions (e.g. coach of junior team);
5. Where it is not practical to complete the background check prior to employment commencing, we must still complete the check as soon as possible. We must advise employees that their ongoing employment is conditional upon the satisfactory outcome of the check;
6. Protect the privacy of any person who is checked and the confidentiality of any information obtained through the checking process.

Any person holding a position identified as a child-related position within the organisation (including District and Zone) is required to:

1. Apply for a Working With Children Check online at www.kidsguardian.nsw.gov.au.
2. Notify BNSW of the Working With Children Check Number as well as full name and date of birth to enable verification.
3. Ensure that the Working With Children Check is renewed at the appropriate time and is current at all times when working or volunteering in the position.

Child-related employment is any work (paid or unpaid) that involves direct and unsupervised contact with children in several types of areas such as sporting clubs and associations that have a significant child membership or involvement.

Employment includes work done:

- under a contract of employment;
- as a sub-contractor;
- as a volunteer for an organisation;
- as a minister of religion (whether or not ordained); and
- undertaking practical training as part of an educational or vocational course

Prohibited person is a person convicted of committing a serious sex offence or a registrable person.

Registrable person is someone who has been found guilty of the following offences against children:

- murder
- sexual offences
- indecency offences
- kidnapping
- child prostitution
- child pornography

Relevant employment proceedings are disciplinary proceedings completed in NSW, or elsewhere, where an employer or professional body that supervises the conduct of the employee has found that 'reportable conduct' or an act of violence occurred, or there is some evidence that it occurred. An act of violence will be relevant only if it was committed by an employee in the course of employment and in the presence of a child.

Reportable conduct is:

- any sexual offence, or sexual misconduct, committed against, with or in the presence of a child (including a child pornography offence);
- any assault, ill treatment or neglect of a child; or
- any behaviour that causes psychological harm to a child.



Bowls New South Wales Ltd

Member Protection Policy

PART C- Procedures

To ensure consistency and that the principles of natural justice are followed in all aspects of handling or conducting complaints, allegations, investigations, tribunals and disciplinary measures, BNSW will follow and implement the following procedures:

- C1 Complaints Procedure
- C2 Mediation Procedure
- C3 Investigation Procedure
- C4 Investigation Procedure for allegations of child abuse
- C5 Tribunal Process
- C6 Disciplinary Policy
- C7 Appeals Procedure



Bowls New South Wales Ltd

Member Protection Policy

Attachment C1

Complaints Procedure

BNSW aims to support people associated with our sport to make and resolve any complaints they may have in a fair, timely and effective way.

We will keep all complaints confidential. We will not provide information about the complaint to another person without the complainant's consent, except if the law requires us disclose this information or if it is necessary to properly resolve the complaint.

To ensure fairness for everyone involved, we will provide the full details of the complaint to the person or people against whom the complaint has been made and ask for their response. As a result, it may be difficult for us to resolve complaints made anonymously.

We will provide informal and formal procedures to resolve complaints. Individuals and organisations can also complain to external organisations under anti-discrimination, child protection and other relevant laws.

If at any point in the complaint process the BNSW CEO or the Member Protection Information Officer (MPIO) considers that a complainant has **knowingly** made an untrue complaint or the complaint is vexatious or malicious, the matter may be referred to the BNSW Board for appropriate action. All complaints will be kept confidential and will not be disclosed to another person without the complainant's consent except if law requires disclosure or if disclosure is necessary to effectively deal with the complaint.

Informal approaches

Step 1: Talk with the other person (if safe, reasonable and appropriate)

If you feel confident to do so, you can approach the other person to discuss the issues and try and resolve the problem directly.

If the dispute remains unresolved (and if appropriate), you should then raise the matter with a senior member of the Committee/ Board or Manager/CEO at your Club for resolution under the Club's grievance policy.

Step 2: Contact a Member Protection Information Officer

We encourage you to talk with one of our Member Protection Information Officers (MPIOs) if:

- the first step is not possible or reasonable
- you are not sure how to handle the problem by yourself
- you want to talk confidentially with someone and find out what options are available to resolve the problem, or
- the problem continues after you approached the other person.

The names and contact details for our MPIOs are available at www.bowlsnsw.com.au.

The MPIO will:

- take confidential notes about your complaint
- try to find out the facts of your complaint
- ask how you would like the problem to be resolved and if you need support
- provide different options for you to resolve the problem
- act as a support person, if you wish
- refer you to an appropriate person (e.g. a mediator) to help you resolve the problem, if necessary
- inform the relevant government authorities and/or police, if required by law to do so
- maintain confidentiality.

Step 3: Decide how to resolve the problem

After talking with the MPIO, you may decide:

- there is no problem
- the problem is minor and you do not wish to take the matter forward
- to try and resolve the problem yourself, with or without a support person

- to resolve the problem with the help of someone impartial, such as a mediator
- to resolve the matter through a formal process.

Formal Process

Step 4: Formal complaint

If it is not possible or appropriate to resolve your complaint through an informal process, you may:

- make a formal complaint in writing to the BNSW CEO, or
- approach a relevant external agency, such as an anti-discrimination or equal opportunity commission, for advice.

If you wish to remain anonymous, BNSW cannot assist you to resolve your complaint. The principles of natural justice must be followed in order to be fair to both sides. This means that BNSW or you may be required to provide the person/people you have complained about with full details of the complaint so they have a fair chance to respond to all the allegations.

After receiving a formal complaint, and based on the material you provide, the BNSW CEO will decide whether:

- they are the most appropriate person to receive and handle the complaint;
- the nature and seriousness of the complaint warrants a formal resolution procedure. (Some complaints may be of a minor and/or purely personal nature with no connection to the activities of BNSW. In these cases, the BNSW CEO may determine that the complaint does not warrant a formal resolution procedure and therefore no further action shall be taken)
- to appoint a person to investigate the complaint;
- to refer the complaint to mediation;
- to refer the complaint to a tribunal hearing;
- to refer the matter to the police or other appropriate authority; and/or
- to implement any interim arrangements that will apply until the complaint process set out in these Procedures is completed.

In making the decision(s) outlined above, the BNSW CEO will take into account:

- whether they have had any personal involvement in the circumstances giving rise to the complaint and, if someone else should handle the complaint
- whether, due to the nature of the complaint, specific expertise or experience may be required to manage the complaint
- your wishes, and the wishes of the respondent, regarding the way the complaint should be handled
- whether, due to the nature of the complaint, the relationship between you and the respondent and any other relevant factors (e.g. an actual or perceived power imbalance between you and the respondent)
- the nature and sensitivity of any information or other material that must be provided by you, the respondent, and any of the other people involved in the complaint
- whether the facts of the complaint are in dispute; and
- the urgency of the complaint, including the likelihood and the consequences (if the complaint is ultimately proven) that you will be subject to further unacceptable behaviour while the complaint process set out in these Procedures is being conducted.

If the BNSW CEO is the appropriate person to handle the complaint they will, to the extent that these steps are necessary:

- get full information from you (the complainant) about your complaint and how you want it resolved (if this information has not already been obtained through earlier steps)
- put the information they've received from you to the person(s) you're complaining about and ask them to provide their side of the story
- decide whether they have enough information to determine whether the matter alleged in your complaint did or didn't happen; and/or
- determine what, if any, further action to take, including disciplinary action in accordance with this policy

Step 5: Investigating the complaint

In some cases, an investigation may be required to determine the facts surrounding the complaint. Our investigations procedure is outlined in Attachment C3.

Following the investigation, a written report will be provided to The BNSW CEO who will determine what further action to take:

- If the complaint is referred to **mediation**, we will follow the steps outlined in Attachment C2 or as agreed by you, the respondent and the mediator.
- If the complaint is referred to a **tribunal hearing**, the hearing will be conducted according to the steps outlined in Attachment C5.
- If the complaint is referred to the **police or another external agency**, we will endeavour to provide all reasonable assistance



Bowls New South Wales Ltd

Member Protection Policy

required by the police or the agency.

- Any costs relating to the complaint process set out in this Policy (e.g. investigation and/or mediation and/or tribunal hearing) are to be met by BNSW unless otherwise stated in the relevant attachment.

Step 6: Reconsidering a complaint or appealing a decision

If mediation is unable to resolve the matter, you may request that BNSW CEO reconsider the complaint in accordance with Step 3. You or the respondent(s) may also appeal a decision made by a tribunal hearing. The grounds and process for appeals are set out in Attachment C6.

Step 7: Documenting the resolution

The BNSW CEO will document the complaint, the process followed and the outcome. This document will be stored in a confidential and secure place. If the complaint was dealt with at a District or Zone level, the information will be stored in the BNSW office. If the matter is of a serious nature, or if the matter was escalated to and/or dealt with at the national level, the original document will be stored at the Bowls Australia office with a copy stored at the BNSW office.

External procedure

There may be a range of external options available to you depending on the nature of your complaint. If you feel that you have been harassed or discriminated against, you can seek advice from the NSW Equal Opportunity Commission without being obliged to make a formal complaint. If the Commission advises you that the problem appears to be a type of harassment that comes within its jurisdiction, you may then make a decision as to whether or not to lodge a formal complaint with the Commission.

Once a complaint is received by an anti-discrimination commission, an investigation will be conducted. If it appears that unlawful harassment or discrimination has occurred, there will usually be an attempt to conciliate the complaint confidentially first. If this fails, or is inappropriate, the complaint may go to a formal hearing where a finding will be made as to whether unlawful harassment or discrimination occurred. The Commission will decide upon what action, if any, will be taken. This could include financial compensation for such things as distress, lost earnings or medical and counselling expenses incurred.

An anti-discrimination commission can decline to investigate a complaint, or dismiss a complaint at any point in the investigation, conciliation or public hearing stages.

If you do lodge a complaint under anti-discrimination law, you may use an appropriate person as a support person throughout the process. It is also common to have a legal representative, particularly at the hearing stage of a complaint.

Contact details for the state and territory anti-discrimination and equal opportunity commissions are available on the Play by the Rules website: <http://www.playbytherules.net.au/resources/quick-reference-guide>

Serious incidents, such as assault or sexual assault, should be reported to the police.

Attachment C2

Mediation Procedure

Mediation is a process by which people who are in conflict can be helped to communicate with each other about what is important for them and how to make decisions about resolving their dispute. Mediators provide a supportive atmosphere and method of talking to one another, to assist in sorting out the issues, coming up with acceptable solutions and making mutually satisfactory agreements.

The mediator does not decide who is right or wrong and does not tell either side what they must do. Instead, he or she helps those involved to talk through the issues and makes sure that the process is as fair as possible for all concerned.

This attachment outlines the general procedure of mediation that will be followed by BNSW.

1. The people involved in a formal complaint (complainant and respondent/s) may work out their own resolution of the complaint or seek the assistance of a neutral third person or a mediator. Mediation may occur either before or after an investigation of the complaint.
2. Mediation will only be recommended:
 - After the complainant and respondent have had their chance to tell their version of events to the BNSW CEO on their own; and
 - The BNSW CEO does not believe that any of the allegations warrant any form of disciplinary action- proven serious allegations will not be mediated, no matter what the complainant desires; and
 - Mediation looks like it will work (i.e. the versions given by the complainant and respondent tally or almost tally and/or at the very least, it looks as though it will be possible for each party to understand the other party's point of view).
3. Mediation will **not** be recommended if:
 - The respondent has a completely different version of the events and they won't deviate from these;
 - The complainant or respondent are unwilling to attempt mediation;
 - Due to the nature of the complaint, the relationship between you and the respondent(s) and any other relevant factors, the complaint is not suitable for mediation; or
 - Legal proceedings have been instigated by either party
4. If mediation is chosen to try and resolve the complaint, the BNSW CEO will, in consultation with the complainant and the respondent(s), arrange for an agreed mediator to mediate the complaint.
5. The mediator's role is to assist the complainant and respondent(s) reach an agreement on how to resolve the problem. The mediator, in consultation with the complainant and respondent(s), will choose the procedures to be followed during the mediation. At a minimum, an agenda of issues for discussion will be prepared by the mediator.
6. The mediation will be conducted confidentially and without prejudice to the rights of the complainant and the respondent(s) to pursue an alternative process if the complaint is not resolved.
7. At the end of a successful mediation the mediator will prepare a document that sets out the agreement reached between the complainant and respondent(s) and it will be signed by them as their agreement.
8. If the formal complaint is not resolved by mediation, the complainant may:
 - Write to the BNSW CEO to request that the BNSW CEO reconsider the complaint in accordance with **Step 5**; or
 - Approach an external agency such as an anti-discrimination commission.



Bowls New South Wales Ltd

Member Protection Policy

Attachment C3

Investigation Process

There will be times when a complaint will need to be investigated and evidence gathered.

An investigation helps determine the facts relating to the incident, as well as possible findings and recommendations.

Any investigation that we conduct will be fair to all people involved.

If we decide that a complaint should be investigated, we will follow the steps outlined below.

1. The BNSW CEO will appoint an appropriate investigator.
2. We will provide a written brief to the investigator that sets out the terms of engagement and his or her roles and responsibilities. The investigator will:
 - interview the complainant and record the interview in writing
 - provide full details of the complaint to the respondent(s) so that they can respond
 - interview the respondent(s) to allow them to answer the complaint and record the interview in writing
 - obtain statements from witnesses and collect other relevant evidence, if there is a dispute over the facts
 - make a finding as to whether the complaint is:
 - **substantiated** (there is sufficient evidence to support the complaint)
 - **inconclusive** (there is insufficient evidence either way)
 - **unsubstantiated** (there is sufficient evidence to show that the complaint is unfounded)
 - **mischievous, vexatious or knowingly untrue.**
 - provide a report to the BNSW CEO documenting the complaint, the investigation process, the evidence, the finding(s) and, if requested, any recommendations.
3. A report documenting the complaint and summarising the investigation process and key points that were found to be substantiated, inconclusive, unsubstantiated and/or mischievous will be provided to the complainant and the respondent(s).
4. Both the complainant and the respondent(s) are entitled to support throughout this process from their chosen support person/adviser.
5. The complainant and the respondent(s) may have the right to appeal against any decision based on the investigation. Information on our appeals process is in Attachment C7.

Attachment C4

Investigation Procedure - Child Abuse

An allegation of child abuse is a very serious matter and must be handled with a high degree of sensitivity. The initial response to a complaint that a child has allegedly been abused should be immediate if the incident/s are serious or criminal in nature while less serious/urgent allegations should be actioned as soon as possible, preferably within 24 hours.

The following is a basic outline of the key processes to follow.

Step 1 - Clarify basic details of the allegation

- Any complaints, concerns or allegations of child abuse should be made or referred to the BNSW CEO.
- The initial response of the person that receives the complaint from the child (or person on behalf of the child) is crucial to the well-being of the child. It is important for the person receiving the information to:
 - Listen to, be supportive and do not dispute what the child says;
 - Reassure the child that what has occurred is not the fault of the child;
 - Ensure the child is safe;
 - Be honest with the child and explain that other people may need to be told in order to stop what is happening; and
 - Ensure that what the child says is quite clear but do not elicit detailed information about the abuse. You should avoid suggestive or leading questions.
- The person receiving the complaint should obtain and clarify basic details (if possible) such as:
 - Child's name, age and address;
 - Person's reason for suspecting abuse (observation, injury or other); and
 - Names and contact details of all people involved, including witnesses.

Step 2 - Report allegations of a serious or criminal nature

- Any individual or organisation to which this policy applies, should immediately report any incident of a serious or a criminal nature to the police and other appropriate authority.
- If the allegation involves a child at risk of harm, the incident should immediately be reported to the police or other appropriate government agency. You may need to report to both the police and the relevant government agency.
- The relevant State or Territory authority should be contacted for advice if there is any doubt about whether the complaint should be reported. If the child's parent/s are suspected of committing the abuse, report the allegation to the relevant government agency.

Step 3 - Protect the child

- The BNSW CEO should assess the risks and take interim action to ensure the child's/children's safety. Some options could include redeployment of the alleged offender to a non-child related position, supervision of the alleged offender or removal/suspension from their duties until the allegations are finally determined.
- The BNSW CEO should also address the support needs of the person against whom the complaint is made. Supervision of the person should ideally occur with the knowledge of the person. If stood down, it should be made clear to all parties that are aware of the incident that this does not mean the person is guilty and a proper investigation still needs to be undertaken.

Step 4 - Further clarify and investigate allegation

For allegations of a serious or criminal nature (for example, sexual abuse):

- Seek advice from the police and relevant government agency as to whether BNSW should carry out its own internal investigation (in addition to any police or relevant government agency investigation).
- If the police and/or relevant government agency advises that it is appropriate, then appoint an independent person (where possible) with appropriate expertise to conduct an investigation. The investigator should:
 - Contact the parents/carers of the child at an appropriate time and as directed by the police or relevant government agency.
 - If appropriate, meet with parents/carers and the child to clarify the incident and offer support on behalf of BNSW if required (example, professional counselling).

Bowls New South Wales Ltd

Member Protection Policy

- Meet with the person against whom the allegation refers at an appropriate time and as directed by the relevant authority and give the person an opportunity to explain or respond to the allegation and identify any witnesses and supporting evidence. The person should have an opportunity to invite a support person/adviser to attend at a meeting and should be offered support (example, professional counselling) if necessary.
- Obtain a signed statement and record of interview from the person.
- Make contact with any witnesses and obtain written and signed statements outlining details of the allegation (what happened, when, how). This should only occur following advice from the relevant authority.
- Obtain other information that could assist in making a decision on the allegation.
- The information collected during the investigation should be made available to the relevant authorities.
- Strict confidentiality, impartiality, fairness and due process must be maintained at all times.

For allegations of a less serious nature (e.g. verbal abuse):

- Where possible, appoint an independent person with appropriate expertise to make contact and meet with each of the people involved to obtain details of the allegation.
- The investigator should follow the procedure set out in Attachment C3.
- Strict confidentiality, impartiality, fairness and due process must be maintained at all times.

Step 5 – Record and analyse all information

- If an internal investigation was conducted under **Step 4**, the investigator will provide a report to BNSW.
- The decision-maker(s) will be the BNSW Board and will remain separate and at arm's length from the investigator.
- The BNSW Board will consider all the information and determine a finding. It will also recommend action and its rationale for the action.

Step 6 – Undertake disciplinary action

- For incidents of a serious or criminal nature, consideration must be given to the findings of the police and/or the government agency before making a decision on disciplinary proceedings.
- If disciplinary action is to be taken, follow the procedures outlined in Attachment C6 of the policy.
- Implement any disciplinary decision recommended by the BNSW Board. The action should be immediate.
- Check with the relevant state government authority to see if you need to forward a report (e.g. the NSW Commission for Children and Young People requires notification of relevant employment proceedings).
- Complete the report form in **Part E** of this policy. Retain the original in a secure place.

Attachment C5

Tribunal Process

A Tribunal may be established from time to time to hear any appeal or disciplinary matter referred to it. Such a Tribunal hearing shall operate in accordance with these procedures.

Step 1 – Establishment of Tribunal

- A Tribunal panel will be established, according to the rules set out in the BNSW Constitution, Regulations and this policy. The number of Tribunal panel members required to be present throughout the hearing will be three (3).
- The Tribunal members will be provided with a copy of all the relevant correspondence, reports or information received and sent by the BNSW CEO relating to the complaint/allegations/appeal.
- The Tribunal hearing will be held as soon as practicable. However, adequate time must be provided for the respondent(s) to prepare for the hearing.
- The Tribunal panel will not include any person who has any actual or perceived conflict of interest or bias regarding the complaint/allegations/appeal.

Step 2 – Notification

- The BNSW CEO will notify the respondent(s) in writing that a Tribunal hearing will take place. The notice will outline:
 - that the person has a right to appear at the Tribunal hearing to defend the complaint/allegations.
 - the details of the complaint and of all allegations, as well as the clause of any policy or rule that has allegedly been breached
 - the date, time and venue of the Tribunal hearing
 - that either verbal or written submissions can be presented at the Tribunal hearing
 - that witnesses may attend the Tribunal hearing to support the position of the respondent/s (statutory declarations of witnesses not available to attend and from character witnesses may also be provided to the Tribunal hearing)
 - an outline of any possible penalties that may be imposed if the complaint is found to be true
 - that legal representation will not be allowed. If the respondent is a minor, he or she should have a parent or guardian present.
- A copy of any information/documents that have been given to the Tribunal panel (e.g. investigation report findings) will be provided to the respondent(s).
- The respondent(s) will be allowed to participate in all BNSW activities and events, pending the decision of the Tribunal, including any available appeal process, unless the BNSW Board believes it is necessary to exclude the respondent/s from all or some activities and events because of the nature of the complaint.
- The BNSW CEO will notify the complainant in writing that a Tribunal hearing will take place. The notice will outline:
 - that the person has a right to appear at the Tribunal hearing to support their complaint
 - the details of the complaint, including any relevant rules or regulations the respondent is accused of breaching
 - the date, time and venue of the Tribunal hearing
 - that either verbal or written submissions can be presented at the Tribunal hearing
 - that witnesses may attend the Tribunal hearing to support the complainant's position (statutory declarations of witnesses not available to attend may also be provided to the Tribunal hearing)
 - that legal representation will not be allowed. If the complainant is a minor, they should have a parent or guardian present.
- A copy of any information / documents given to the Tribunal (e.g. investigation report findings) will be provided to the complainant.
- If the complainant believes the details of the complaint are incorrect or insufficient, he or she should inform the BNSW CEO as soon as possible so that the respondent(s) and members of the Tribunal panel can be properly informed of the complaint.
- If possible, the Tribunal panel should include at least one person with knowledge or experience of the relevant laws/rules (e.g. anti-discrimination).

Step 3 – Tribunal Procedure

- The following people will be allowed to attend the Tribunal hearing:
 - Tribunal panel members
 - the respondent(s)
 - the complainant

Bowls New South Wales Ltd

Member Protection Policy

- any witnesses called by the respondent(s)
- any witnesses called by the complainant
- any parent/guardian or support person required to support the respondent or the complainant.
- If the respondent(s) is not present at the set hearing time and the Tribunal chairperson considers that no valid reason has been presented for this absence, the Tribunal hearing will continue subject to the chairperson being satisfied that all Tribunal notification requirements have been met.
- If the Tribunal chairperson considers that there is a valid reason for the non-attendance of the respondent(s), or the chairperson does not believe the Tribunal notification requirements have been met, then the Tribunal hearing will be rescheduled to a later date.
- The Tribunal chairperson will inform the BNSW CEO of the need to reschedule the hearing and the BNSW CEO will arrange for the Tribunal to be reconvened.
- The Tribunal chairperson will read out the complaint, ask each respondent if he or she understands the complaint and if he or she agrees or disagrees with the complaint.
- If the respondent agrees with the complaint, he or she will be asked to provide any evidence or witnesses that should be considered by the Tribunal when determining any disciplinary measures or penalties.
- If the respondent disagrees with the complaint, the complainant will be asked to describe the circumstances that lead to the complaint being made.
 - Reference may be made to brief notes.
 - The complainant may call witnesses.
 - The respondent may question the complainant and any witnesses.
- The respondent will then be asked to respond to the complaint.
 - Reference may be made to brief notes.
 - The respondent may call witnesses.
 - The complainant may ask questions of the respondent and any witnesses.
- The complainant and respondent(s) may be present when evidence is presented to the Tribunal hearing. Witnesses may be asked to wait outside the hearing until they are required.
- The Tribunal may:
 - consider any evidence, and in any form, that it deems relevant
 - question any person giving evidence
 - limit the number of witnesses presented to those who provide new evidence
 - require (to the extent it has power to do so) the attendance of any witness it deems relevant
 - act in an inquisitorial manner in order to establish the truth of the issue/complaint before it.
- Video evidence, if available, may be presented. Arrangements must be made entirely by the person(s) wishing to offer this type of evidence.
- If the Tribunal panel considers that at any time during the hearing there is any unreasonable or intimidatory behaviour from anyone, the Tribunal chairperson may deny further involvement of that person in the hearing.
- After all the evidence has been presented, the Tribunal will make its decision in private. It must decide whether the complaint has, on the balance of probabilities, been substantiated. As the seriousness of the allegation increases, so too must the level of satisfaction of the Tribunal that the complaint has been substantiated. The respondent(s) have the opportunity to address the Tribunal on disciplinary measures which may be imposed. Any disciplinary measures imposed must be reasonable in the circumstances and in accordance with Attachment C6.
- All Tribunal decisions will be by majority vote.
- The Tribunal chairperson will announce the decision in the presence of all those involved in the hearing and will declare the hearing closed. Alternatively, he or she may advise those present that the decision is reserved and will be handed down in written form at a later time.
- Within 48 hours, the Tribunal chairperson will:
 - forward a notice of the Tribunal's decision to the BNSW CEO, including any disciplinary measures imposed.
 - forward a letter reconfirming the Tribunal's decision to the respondent(s), including any disciplinary measures imposed. The letter should also outline the process and grounds for an appeal, if allowed. If the matter is especially complex or important, the Tribunal chairperson may inform the parties in writing within 48 hours that the decision will be delayed for a further 48 hours.
- The Tribunal does not need to provide written reasons for its decision.

Step 4 - Appeals Process

- The appeals process is set out in Attachment C7.

Attachment C6

Disciplinary Policy

Any disciplinary penalties imposed at a Tribunal hearing or by the BNSW Board must:

- Observe any contractual and/or employment rules and requirements;
- Conform to the principles of natural justice;
- Be fair and reasonable;
- Be based on the evidence and information presented;
- Be within the powers of the BNSW Board or Tribunal in accordance with this Policy.

1. Individual Member

If a finding is made that an Individual Member has breached the BNSW Constitution, Regulations or Policy (including the Codes of Conduct), one or more of the following forms of disciplinary penalties may be imposed:

- No penalty or sanction.
- A direction that the individual make a verbal and/or written apology;
- A written warning;
- A direction that the individual attend counselling to address their behaviour;
- A withdrawal of any awards, placing, records, achievements bestowed in any tournaments, activities or events held or sanctioned by BNSW;
- A demotion or transfer of the individual to another location, role or activity;
- A suspension of the individual's membership/registration or participation or engagement in a role or activity or event;
- Termination of the individual's membership/registration, appointment or engagement;
- Recommend that BNSW terminate the individual's membership/registration, appointment or engagement;
- In the case of a coach or official, a direction that the relevant organisation de-register the accreditation of the coach or official for a period of time or permanently;
- Any other form of discipline that the BNSW Board or Tribunal considers appropriate for the breach.

When imposing any form of discipline, it will be accompanied by a warning that a similar breach of policy by that individual in the future may result in the imposition of a more serious form of discipline.

2. Organisation (Club or affiliated District or Zone)

If a finding is made that a Club or affiliated District or Zone of BNSW, not being an individual, has breached the BNSW Constitution, Regulations or Policy (including the Codes of Conduct), one or more of the following forms of disciplinary penalties may be imposed:

- No penalty or sanction;
- A written warning;
- A monetary fine;
- A direction that any rights, privileges and benefits provided to that Organisation by a Club, District, Zone, State or National Association be suspended for a specified period;
- A direction that any funding granted or given to it by BNSW cease from a specified date;
- A direction that the BNSW cease to sanction events held by or under the auspices of that Organisation;
- A recommendation that its membership or affiliation with BNSW be suspended or terminated in accordance with the relevant constitution or rules; and/or
- Any other form of discipline that BNSW considers to be appropriate.

When imposing any form of discipline, it will be accompanied by a warning that a similar breach of policy by the organisation in the future may result in more serious form of discipline.

3. Factors to consider when imposing discipline

The form of discipline to be imposed on an individual or organisation will depend on factors such as:

- Nature and seriousness of the behaviour or incidents;
- In a case where action is taken concurrently with or in lieu of a resolution of a formal complaint, the wishes of the complainant;
- If the individual concerned knew or should have known that the behaviour was a breach of the policy;



Bowls New South Wales Ltd

Member Protection Policy

- The level of contrition of the respondent(s);
- The effect of the proposed disciplinary measures on the respondent(s) including any personal, professional or financial consequences;
- If there have been relevant prior warnings or disciplinary action; and/or
- If there are any mitigating circumstances such that the respondent(s) shouldn't be disciplined at all or not disciplined so seriously.



Bowls New South Wales Ltd

Member Protection Policy

Attachment C7

Appeals Procedure

1. If a complainant or a respondent(s) is not satisfied with the outcome of a mediation process or a Tribunal decision, they can lodge an appeal to BNSW on one or more of the following grounds:
 - that there was a substantial departure from the hearing process
 - that the disciplinary measure/s imposed is unjust and/or unreasonable
 - that the decision was not supported by the information/evidence provided at the mediation or to the Tribunal hearing.
2. A person wanting to appeal must lodge a letter setting out the basis for their appeal to the BNSW CEO within 14 days of the decision being made. An appeal fee of \$500 shall be included with the letter of intention to appeal.
3. If the letter of appeal is not received by the BNSW CEO within this time, the right of appeal will lapse. If the letter of appeal is received but the appeal fee is not received within this time, the appeal will lapse.
4. The letter of appeal and the notice of the Tribunal's decision will be forwarded to the BNSW CEO to review and to decide whether there are sufficient grounds for the appeal to proceed. The BNSW CEO may invite any witnesses to the meeting that he or she believes are required to make an informed decision.
5. If the appellant has not shown sufficient grounds for an appeal, then the appeal will be rejected. The appellant will be notified in writing, including the reasons for the decision. The appeal fee will be forfeited.
6. If the appeal is accepted, an Appeal Tribunal with new panel members will be convened to rehear the complaint, and the appeal fee will be refunded.
7. The Tribunal hearing procedure shall be followed for the Appeal Tribunal.
8. The decision of the Appeal Tribunal will be final.

PART D

Codes of Conduct

BNSW has adopted core values and General Codes of Conduct in its working environment that set the standard and tone for interactions internally and externally.

1. General Codes of Conduct

- Encourage and support opportunities for people to learn appropriate new behaviours and skills.
- Support and encourage people to participate in all aspects of sport.
- Treat each person as an individual.
- Display control and courtesy to all involved in our sport.
- Respect the rights and worth of every person regardless of their gender, ability, cultural background or religion.
- Wherever possible, avoid unaccompanied and unobserved one-on-one activity (when in a supervisory capacity or where a power imbalance will exist).
- Wherever possible, avoid unaccompanied and unobserved one-on-one activity with people under the age of 18 years.
- Display appropriate and responsible behaviour in all interactions.
- Display responsible behaviour in relation to alcohol and other drugs.
- Act with integrity and objectivity and accept responsibility for your decisions and actions.
- Ensure your decisions and actions contribute to a safe environment free from harassment.
- Do not tolerate harmful or abusive behaviours.

2. Committee and Volunteers

- We will, by virtue of the position of trust we hold, always exercise our rights and powers in good faith, honesty and for the benefit of BNSW.
- We will always comply with common law and statutory requirements, as well as the Constitutional requirements of BNSW.
- We will always consider the long and short-term interests of BNSW.
- We will always try to avoid actual or potential conflicts of interest.
- We will ensure that any information we gain regarding BNSW and its members will remain confidential and will not be used inappropriately for an individual or anyone else's advantage.
- We will condemn unsporting behaviour and promote respect for the individuality of Members.
- We will be a positive role model in behaviour and ensure that our comments are positive and supportive.
- We will keep up to date with the Laws of the Sport of Bowls, trends, and principles.
- We will refrain from any form of personal abuse towards Members and other officials.
- We will refrain from any form of harassment (as defined by NSW Anti-Discrimination Board) towards Members or other officials.
- We will not arrive at meetings/other official gatherings under the influence of alcohol
- We will respect the rights, dignity and worth of all people involved in the sport, regardless of their gender, ability, disability or cultural background.
- We will support the decisions/resolutions agreed by consensus of the committee regardless of our personal views.
- We understand that if we are negligent and fail to comply, we may be liable to compensate Members of the Association or third parties.
- We understand that we are a representative of BNSW and as such agree to follow all relevant BNSW policies and procedures as set by the BNSW Board.

3. Administrators

- Act honestly, in good faith and in the best interests of the sport as a whole.
- Ensure that any information acquired or advantage gained from the position is not used improperly.
- Conduct your responsibilities with due care, competence and diligence.
- Do not allow prejudice, conflict of interest or bias to affect your objectivity.

4. Spectators

- Respect the performance and efforts of all people.



Bowls New South Wales Ltd

Member Protection Policy

Part E

Reporting Documents/Forms

To assist in consistency and accuracy in following procedure and reporting on the issues covered by the BNSW Member Protection Policy, the following documents are to be used:

- E1** - Confidential Record of Informal Complaint – to be used by the BNSW CEO or others who receive a complaint or allegation
- E2** - Confidential Record of Formal Complaint – to be used when a formal complaint is received by BNSW
- E3** - Confidential Record of Child Abuse Allegation – to be used by the BNSW CEO or others who receive complaints/allegations of child abuse
- E4** - Record of Mediation – to be used by those who conduct a mediation
- E5** - Record of Tribunal Decision

General principles to be followed when completing a report of a complaint:

- Treat all complaints seriously.
- Deal with complaints promptly, sensitively and confidentially.
- Maintain a calm attitude.
- Ask the complainant if they will consent to you taking notes.
- Write the description of the complaint /problem using the complainants own words (as much as is possible).
- Find out the nature of the relationship between the complainant and the person complained about (for example, coach/competitor, team members, etc) and if there is any relevant history.
- Take note of the facts and do not pre-judge the situation.
- Ask the complainant if they fear victimisation or other consequences.
- Find out what outcome the complainant wants and if they need any support.
- Ask the complainant how they want the complaint to be dealt with under the policy.
- Keep the complaint confidential and do not disclose it to another person without the complainant's consent except if disclosure is required by law (for example, a report to government authorities) or if disclosure is necessary to effectively deal with the complaint.



Bowls New South Wales Ltd

Member Protection Policy

Attachment E1 Confidential Record Of Informal Complaint

Name of Interviewer			Date:
Complainant's Name	<input type="checkbox"/> Over 18 <input type="checkbox"/> Under 18		
Role/status in bowls	<input type="checkbox"/> Administrator (volunteer) <input type="checkbox"/> Athlete/player <input type="checkbox"/> Coach/Assistant Coach <input type="checkbox"/> Employee (paid) <input type="checkbox"/> Official	<input type="checkbox"/> Parent <input type="checkbox"/> Spectator <input type="checkbox"/> Support Personnel <input type="checkbox"/> Other _____	
Location/event of alleged issue			
Facts as stated by complainant			
Nature of complaint (category/basis/grounds) Can tick more than one box	<input type="checkbox"/> Harassment or Discrimination <input type="checkbox"/> Sexual/sexist <input type="checkbox"/> Selection dispute <input type="checkbox"/> Sexuality <input type="checkbox"/> Personality clash <input type="checkbox"/> Racial <input type="checkbox"/> Bullying <input type="checkbox"/> Religious	<input type="checkbox"/> Verbal abuse <input type="checkbox"/> Pregnancy <input type="checkbox"/> Physical abuse <input type="checkbox"/> Disability <input type="checkbox"/> Victimisation <input type="checkbox"/> Child Abuse <input type="checkbox"/> Other _____	



Bowls New South Wales Ltd

Member Protection Policy

Attachment E1

Confidential Record of Informal Complaint - (continued)

Feelings expressed by complainant (completing this may help to separate emotional content from facts)	
What they want to happen to fix the issue	
What information I provided	
What they are going to do now	

This record and any notes must be kept in a confidential place – do not enter it into a computer system. If the issue becomes a formal complaint, this record is to be sent to the BNSW CEO.



Bowls New South Wales Ltd

Member Protection Policy

Attachment E2 Confidential Record of Formal Complaint

Name of Interviewer			Date:
Complainant's Name	<input type="checkbox"/> Over 18 <input type="checkbox"/> Under 18		
Role/status in bowls	<input type="checkbox"/> Administrator (volunteer) <input type="checkbox"/> Athlete/player <input type="checkbox"/> Coach/Assistant Coach <input type="checkbox"/> Employee (paid) <input type="checkbox"/> Official	<input type="checkbox"/> Parent <input type="checkbox"/> Spectator <input type="checkbox"/> Support Personnel <input type="checkbox"/> Other _____	
Location/event of alleged issue			
Facts as stated by complainant			
Nature of complaint (category/basis/grounds) Can tick more than one box	<input type="checkbox"/> Harassment or Discrimination <input type="checkbox"/> Sexual/sexist <input type="checkbox"/> Selection dispute <input type="checkbox"/> Sexuality <input type="checkbox"/> Personality clash <input type="checkbox"/> Racial <input type="checkbox"/> Bullying <input type="checkbox"/> Religious	<input type="checkbox"/> Verbal abuse <input type="checkbox"/> Pregnancy <input type="checkbox"/> Physical abuse <input type="checkbox"/> Disability <input type="checkbox"/> Victimization <input type="checkbox"/> Child Abuse <input type="checkbox"/> Other _____	



Bowls New South Wales Ltd

Member Protection Policy

Attachment E2 Confidential Record of Formal Complaint - (continued)

Methods (if any) of attempted informal resolution	
Support person (if any)	
Formal resolution procedures followed (outline)	
Finding (if investigated)	
Decision and action recommended (if brought before a Hearing tribunal)	
<p>If mediated: Date of mediation- Were both parties present?- Terms of Agreement-</p> <p>Any other action taken-</p>	
Decision and action recommended (if brought before an Appeals tribunal)	
Resolution	<input type="checkbox"/> Less than 3 months to resolve <input type="checkbox"/> Between 3 – 8 months to resolve <input type="checkbox"/> More than 8 months to resolve



Bowls New South Wales Ltd

Member Protection Policy

Attachment E2

Confidential Record of Formal Complaint - (continued)

Completed by	Name: Position with BNSW: Signature: Date:
Signed by	Complainant: Respondent:

This record and any notes must be kept in a confidential place. If the complaint is of a serious nature, or is escalated to and/or dealt with at the national level, the original must be forwarded to the national body and a copy kept at the club/District/State level (whatever level the complaint was made).



Bowls New South Wales Ltd

Member Protection Policy

Attachment E3 Confidential Record of Child Abuse Allegation

Complainant's Name (if other than the child)		Date Formal Complaint Received
Role/status in bowls		
Child's Name	Age:	
Child's Address		
Person's reason for suspecting abuse (e.g. observation, injury, disclosure)		
Name of person complained about		
Role/status in bowls	<input type="checkbox"/> Administrator (volunteer) <input type="checkbox"/> Parent <input type="checkbox"/> Athlete/player <input type="checkbox"/> Spectator <input type="checkbox"/> Coach/Assistant Coach <input type="checkbox"/> Support Personnel <input type="checkbox"/> Employee (paid) <input type="checkbox"/> Other <input type="checkbox"/> Official _____	
Witnesses (if more than 3 witnesses, attach details to this form)	Name (1): Contact details: Name (2): Contact details: Name (3): Contact details:	
Interim action (if any) taken (to ensure child's safety and/ or to support needs of person complained about)		



Bowls New South Wales Ltd

Member Protection Policy

Attachment E3

Confidential Record of Child Abuse Allegation - (continued)

Police contacted	Who: When: Advice provided:
Government agency contacted	Who: When: Advice provided:
CEO contacted	Who: When:
Police and/or government agency investigation findings	
Internal investigation findings (if any)	
Action taken	
Completed by	Name: Position with BNSW: Signature: Date:
Signed by	Complainant (if not a child)

This record and any notes must be kept in a confidential place and provided to the relevant authorities (police and government) should they require them.



Bowls New South Wales Ltd

Member Protection Policy

Attachment E4 Record of Mediation

Present at mediation	
Date of mediation	
Venue of mediation	
Mediator	
Summary of mediation (minutes attached)	
Outcome of mediation	
Follow-up to occur (if required)	
Completed by: (signature)	
Signed by: Complainant (signature)	
Signed by: Respondent (signature)	



Bowls New South Wales Ltd

Member Protection Policy

Attachment E5 Record of Tribunal Decision

Complainant's Name (if other than the child)		Date Formal Complaint Received
Role/status in bowls	<input type="checkbox"/> Administrator (volunteer) <input type="checkbox"/> Athlete/player <input type="checkbox"/> Coach/Assistant Coach <input type="checkbox"/> Employee (paid) <input type="checkbox"/> Official	<input type="checkbox"/> Parent <input type="checkbox"/> Spectator <input type="checkbox"/> Support Personnel <input type="checkbox"/> Other _____
Name of person complained about		
Role/status in bowls	<input type="checkbox"/> Administrator (volunteer) <input type="checkbox"/> Athlete/player <input type="checkbox"/> Coach/Assistant Coach <input type="checkbox"/> Employee (paid) <input type="checkbox"/> Official	<input type="checkbox"/> Parent <input type="checkbox"/> Spectator <input type="checkbox"/> Support Personnel <input type="checkbox"/> Other _____
Location/event of alleged issue		
Description of alleged issue		
Nature of complaint (basis/ grounds/category)	<input type="checkbox"/> Harassment or Discrimination <input type="checkbox"/> Sexual/sexist <input type="checkbox"/> Selection dispute <input type="checkbox"/> Sexuality <input type="checkbox"/> Personality clash <input type="checkbox"/> Racial <input type="checkbox"/> Bullying <input type="checkbox"/> Religious	<input type="checkbox"/> Verbal abuse <input type="checkbox"/> Pregnancy <input type="checkbox"/> Physical abuse <input type="checkbox"/> Disability <input type="checkbox"/> Victimization <input type="checkbox"/> Child Abuse <input type="checkbox"/> Other _____
Methods (if any) of attempted informal resolution		
Support person (if any)		



Bowls New South Wales Ltd

Member Protection Policy

Attachment E5

Record of Tribunal Decision - (continued)

Tribunal Members	
Tribunal hearing date and venue	
Tribunal decision (attach report)	
Action recommended and any follow up report required	
If decision appealed, date appeal was lodged	
Appeal hearing date	
Appeal decision (attach report)	
Action recommended	
Completed by	Name: Position with BNSW: Signature: Date:
Signed by	Complainant: Respondent: