Child Safe Complaints Handling Procedure

April 2026

Authorisation

Version	Author	Date	Approved By	Approval Date	Review Date
1	Megan Mitchell	April 2026	Delta Gymnastics	7/4/2026	3/4/2026

Delta Gymnastics – Complaints Handling Procedure

Updated: April 2026

Authorisation: Megan Mitchell (People Director)

Effective Date: May 2026

Applies To: All full-time, part-time, casual, and volunteer coaching and administrative staff.

1. Purpose & Scope

Delta Gymnastics is committed to fostering an open complaints culture where all individuals feel safe raising concerns. This procedure outlines the process for responding to, reporting, investigating, and recording child safety complaints to comply with the Child Safe Organisations Act 2024 (Qld) and the 10 Queensland Child Safe Standards.

This procedure applies to all Delta Sports Pty Ltd personnel, including staff, contractors, judges, and volunteers across all venues (including Brisbane, Gold Coast, Cairns, and school-based programs at St Hilda's, St Margaret's, and Clayfield College).

2. Receiving Complaints

A child safety complaint may include a suspicion of harm, an allegation against a staff member, a disclosure of abuse, or a breach of the Delta Child Safe Code of Conduct.

- **Access:** Complaints can be made via the Delta Website, Parent Portal, directly to a Club Manager, or by emailing **childwellbeing@deltagym.com.au**
- **Anonymity:** Anonymous reporting is permitted to ensure all concerns are captured. However, if an anonymous report lacks sufficient detail to allow for a fair response (Natural Justice), Delta will focus on systemic improvements (e.g., increased supervision in a specific gym zone) rather than individual disciplinary action.

3. Responding to Child-Initiated Complaints

When responding to a child who is making a complaint, all personnel must follow the LISTEN, REASSURE, and RESPECT process:

- **Listen:** Allow the child to use their own words in a safe, comfortable environment. Ask open-ended questions, avoiding interrogation or leading questions.
- **Reassure:** Validate their feelings and reassure the child that they have done the right thing by voicing their concern, it is not their fault, and they are believed.
- **Respect:** Explain the next steps using age-appropriate language. Never make promises you cannot keep (e.g., promising to keep a secret), as you may need to tell someone else to keep them safe.

4. Mandatory Reporting & Immediate Action

Immediate risks to a child's safety must be addressed without delay. Personnel must contact the relevant authorities:

- **Immediate Danger:** If a child is in immediate, life-threatening danger or a criminal offence is occurring, dial Triple Zero (000) for Police immediately.
- **Significant Harm/Abuse:** If there is a reasonable suspicion of significant harm or neglect, contact the Queensland Department of Child Safety, Seniors and Disability Services via the Regional Intake Service (Brisbane: 1300 682 254 | North Qld: 1300 706 147 | After Hours: 1800 177 135).
- **Reportable Conduct Scheme:** If the allegation involves sexual offences, misconduct, ill-treatment, or physical violence by a worker or volunteer, the Head of Entity (Director) is legally obligated to notify the Queensland Family and Child Commission (QFCC) within 3 business days. An Interim Report is due within 30 business days.
- **Sport Integrity Australia (SIA):** If the conduct breaches the National Integrity Framework, a report must also be lodged with SIA.

5. Investigation Process For all complaints requiring internal investigation, Delta will follow a structured five-phase approach:

- **Phase 1: Immediate Response & Safety:** Ensure the child is safe. If the respondent is a staff member, they may be stood down or moved to non-child-related duties. Secure any CCTV, digital logs, or physical evidence.
- **Phase 2: Mandatory Notifications:** Fulfil all legal reporting obligations to the Dept of Child Safety, QFCC, and SIA before initiating an internal investigation to ensure no external investigations are compromised.
- **Phase 3: Information Gathering & Procedural Fairness:** Offer support services (like Kids Helpline) to the affected family. Interview all witnesses. Ensure the respondent is given a formal opportunity to respond to the allegations in writing.
- **Phase 4: Findings & Disciplinary Action:** Determine if the allegation is Substantiated, Inconclusive, or Unsubstantiated. Take appropriate sanctions per the Disciplinary Policy (e.g., formal warning, retraining, or termination) and submit the final investigation outcome to the QFCC.
- **Phase 5: Closing the Loop:** Debrief the affected parties on the outcome within privacy limits. Conduct a systemic review to identify if a "blind spot" or gap in training contributed to the incident.

6. Record Keeping and Continuous Improvement

- **The Incident Register:** All concerns must be recorded in the password-protected Delta Child Safety Incident Register, supported by corresponding individual Child Safety Incident Report Forms containing disclosure notes, witness statements, and final outcomes.
- **40-Year Retention:** All records relating to serious child safety matters or reportable conduct must be digitised and stored in a secure lockbox for a mandatory period of 40 years.
- **Systemic Review:** The Risk Committee will review the Incident Register monthly during leadership meetings to identify systemic trends (e.g., recurring issues in a specific time slot or venue) and update policies, physical environments, or training as required