



SURF LIFE SAVING  
NEW SOUTH WALES

# MEMBER PROTECTION TOOLKIT FOR CLUBS



# Member Protection Toolkit for Clubs

This toolkit is designed to assist Member Protection Information Officers, Complaints Managers, Child Safe Co-ordinators and club committees to structure a team that is able to deal effectively with member protection issues. The kit is intended for use alongside the following three SLSA policies:

[SLSA Policy 6.04 – Child Safe](#)

[SLSA Policy 6.05 – Member Protection](#)

[SLSA Policy 6.06 – Complaints Resolution](#)

Knowledge of these policies is assumed in this toolkit, which aims to assist clubs with putting policy into practice.

This toolkit covers the following key areas:

- Why is member protection important?
- The role of the club committee
- Member Protection Team
  - Structure
  - Training requirements
  - Position descriptions
- Complaints resolution
  - FAQs
  - Flow chart of the complaints resolution process
  - Initial assessment of a complaint
  - Additional notes for an investigation
  - Resources

## Why is member protection important?

Member protection is a term widely used in the Australian sports industry to describe the practices that sporting organisations put in place to protect their members from discrimination, harassment, abuse and other inappropriate behaviour.

Member protection is important for any member-based club – both being proactive and reactive. It allows members to take part in activities in a positive and safe environment.

Each year, all SLS members sign the SLSA membership form which binds them to SLS policies such as the Member Protection and Child Safe policies.

## The role of the club committee

Each of the three SLS policies outlines the commitment that SLS entities (such as clubs) make to keep members safe. To support clubs to fulfil these commitments, committees need to ensure that the following three key positions are filled, and identified on SurfGuard in the relevant 'Officer' position:

- Member Protection Information Officer (MPIO)
- Complaints Manager
- Child Safe Coordinator

Clubs can utilise MPIOs and Complaints Managers from other clubs or the branch and are encouraged to talk to their branch to assist with the sharing of resources if required or preferred. The Child Safe Coordinator must be a member of the club. These three roles will be mandatory club roles for the 2023/24 season. It is strongly recommended that MPIOs and Complaints Managers are not committee members.

Clubs need to ensure that members are aware of:

- the contact details for their MPIO;
- the Member Protection Policy and Code of Conduct; and
- how to lodge a complaint through the online portal.

This awareness can be done through the club website and internal communications to members. Templates can be found in the [SLSA Policy Changes guide](#).

The committee must also:

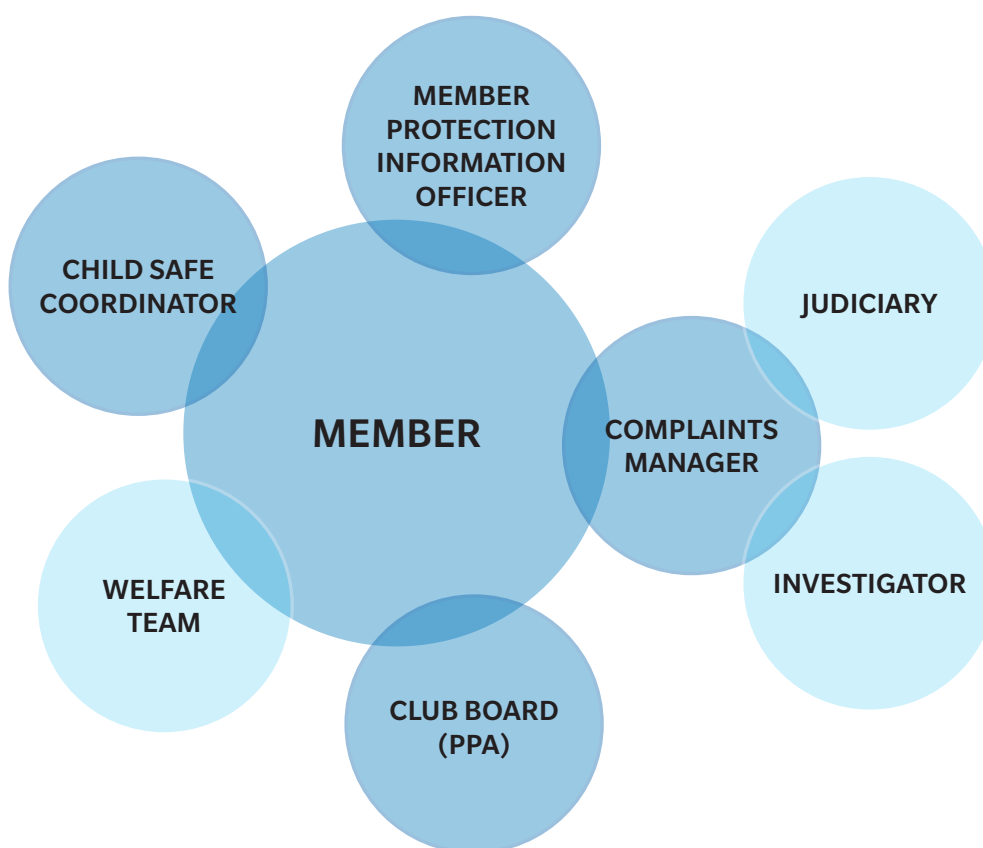
- ensure there is a process in place for collecting and verifying Working with Children Checks for all appropriate members according to the [WWCC requirements](#); and
- ensure that all relevant members (including committee members) complete the SLSA Child Safe Awareness online module.

More information about who is required to complete this training can be found [here](#), and SLSNSW will be supporting clubs to monitor completions in the lead up to 31 December 2022.

## Member Protection Team

### STRUCTURE

To ensure that clubs are set up to support members and adhere to SLS's member protection policies, SLSNSW recommends the following Member Protection Team structure. The structure below has the member as the central point, with a number of welfare roles as support.



The concept of a Welfare Team is an optional consideration for clubs and branches, with the aim of providing greater support for members' mental health and wellbeing, outside of critical incident response and recovery (which is managed and coordinated by SLSNSW). SLSNSW will be implementing a Mental Health & Wellbeing Champions Program in the 2022/23 season to support the building of skills in this area at a club and branch level.

# Training requirements

POSITION	LEVEL	QUALIFICATION	SKILLS UPDATE	KEY ROLE	REQUIREMENT
MPIO**	Club* & Branch	<ul style="list-style-type: none"> <li>MPIO Play by the rules</li> <li>SLS Online Child Safe Awareness</li> <li>SLNSW MPP &amp; Child Safe policy workshop</li> </ul>	Online every 2 years	<ul style="list-style-type: none"> <li>Providing advice &amp; information to members regarding complaints</li> <li>Diffusing situations</li> </ul>	Mandatory 2023/24
Complaints Manager**	Club* & Branch	<ul style="list-style-type: none"> <li>Sports Integrity complaints handler course</li> <li>SLNSW Complaints MPP &amp; Complaints Policy workshop</li> </ul>	NA	<ul style="list-style-type: none"> <li>Assesses, investigates, &amp; acts on formal complaints</li> </ul>	Mandatory 2023/24
Child Safe Coordinator	Club & Branch	<ul style="list-style-type: none"> <li>SLS Online Child Safe Awareness</li> <li>SLNSW Child Safe policy workshop</li> </ul>	NA	<ul style="list-style-type: none"> <li>Point of contact for all communication regarding child safety</li> <li>Ensures child safety requirements &amp; requests are actioned</li> </ul>	Mandatory 2023/24
Committee	Club & Branch	<ul style="list-style-type: none"> <li>SLS Child Safe Awareness</li> </ul>	NA	<ul style="list-style-type: none"> <li>Persons in a Position of Authority (PPA)</li> <li>Responsible for ensuring a safe &amp; positive environment for members</li> </ul>	Mandatory
Welfare Team	Club* &/or Branch	<ul style="list-style-type: none"> <li>TBC in 2022/23 season through Mental Health &amp; Wellbeing Champions program</li> </ul>	NA	<ul style="list-style-type: none"> <li>TBC in 2022/23 season through Mental Health &amp; Wellbeing Championships program</li> </ul>	Recommended
Investigator	Club* &/or Branch	<ul style="list-style-type: none"> <li>SLNSW MPP workshop</li> </ul>	NA	<ul style="list-style-type: none"> <li>Investigates complaints</li> </ul>	As needed
Judiciary	Club* &/or Branch	<ul style="list-style-type: none"> <li>Three individuals appointed by Complaints Manager</li> <li>One must be a SLS member</li> <li>Chair should have skills &amp; experience to run a judiciary</li> <li>SLNSW MPP workshop</li> </ul>	NA	<ul style="list-style-type: none"> <li>Decides on the outcome of formal complaints</li> </ul>	As needed

\* For smaller clubs, it is possible to share these roles/resources - clubs need to assess what is possible for them and work with other clubs or their branch to ensure members have access to these roles/resources.

\*\* Strongly recommended that these roles are NOT committee members.

# Position descriptions

Positions descriptions for the following three roles can be found on the SLSNSW website and are available in word for editing at a local level.

MEMBER PROTECTION  
INFORMATION OFFICER

COMPLAINTS HANDLER

CHILD SAFE COORDINATOR

## INVESTIGATOR

A complaints manager may investigate a complaint or they may appoint an independent investigator. See Schedule 5 of the Complaints Resolution Policy for the investigation procedure.

## JUDICIARY

A complaints manager may refer the complaint to a judiciary for resolution. A judiciary may also be called upon to investigate a complaint. See Schedule 6 of the Complaints Resolution Policy for the judiciary procedure.

# Complaints resolution

## FAQs

### ***Do members come directly to the Complaints Manager with a complaint?***

No. Members are encouraged to seek out the MPIO attached to the club to receive guidance as to the most appropriate course of action. If they wish to submit a complaint, it will be lodged through the SLS online complaints system.

### ***How will Complaints Managers be notified of a complaint?***

Members who are listed as the Complaints Manager in the 'Officers' section in SurfGuard will receive email notifications from the SLS online complaints system. The online system automatically triages the complaints according to the boxes the complainant ticks. Depending on the nature of a complaint, it can be allocated to a club, branch, state or to SLSA as explained in the table below.

CLUB or BRANCH	General Complaints including bullying, harassment dissatisfaction with decisions, member to member matters
BRANCH or STATE	Branch or State related complaints or inter-club matters
STATE and/or SLSA	All Child Safe related matters, allegations of Sexual Misconduct or any Serious Criminal Conduct or breach of <b>Policy 6.16</b>
SLSA	National related complaints or inter-State matters

### ***How does a Complaints Managers access the SLS Online Complaints system?***

If you are listed as a Complaints Manager in the office positions in surfguard, you can access the online complaints portal through your members portal log in. The online reporting system user guide can be found [here](#). There is also a video tutorial: **Video tutorial - How to navigate the Online Reporting System** – found in SLSA documents in your portal.

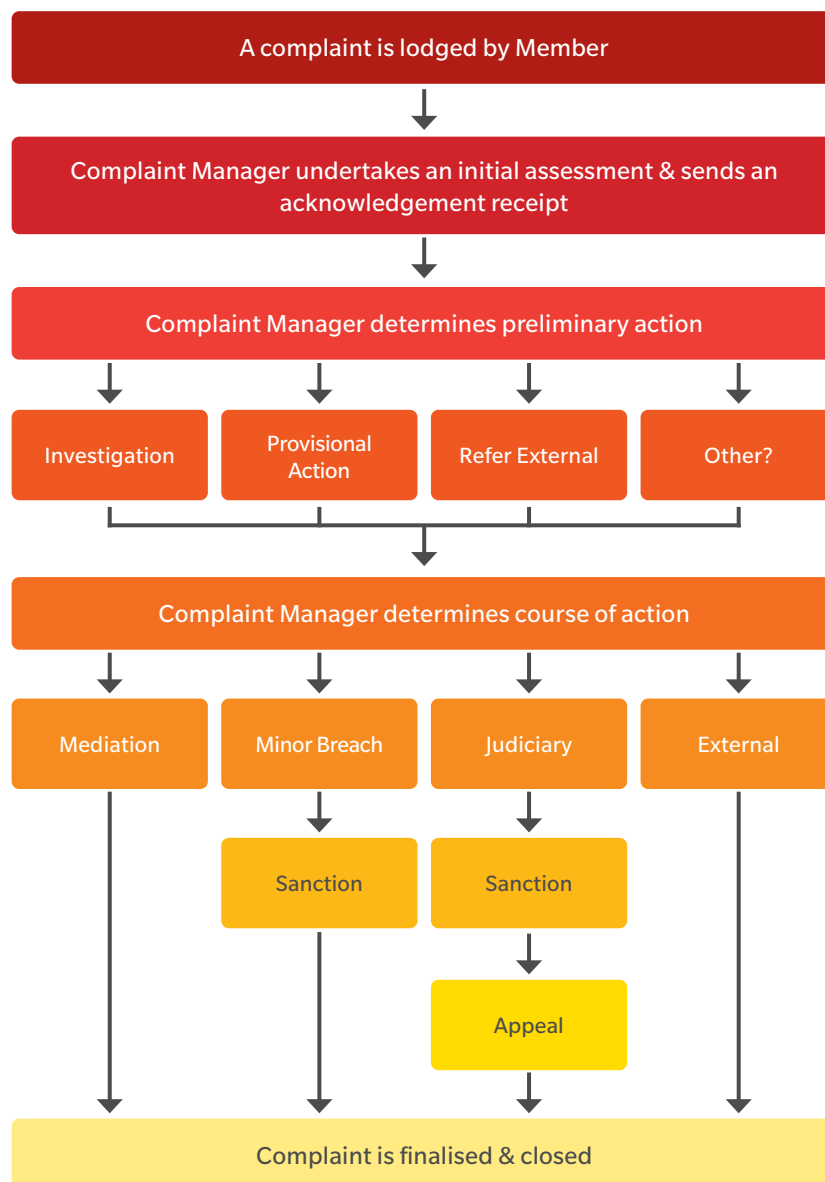
# SLSA COMPLAINTS RESOLUTION

Before you lodge a formal complaint, have you:

- attempted to speak to and resolve your grievance with the Respondent?
- discussed your grievance with your SLS Entity MPIO?

If no, you are encouraged to attempt the above before lodging a complaint under the policy

If yes, and you have not been able to resolve your grievance, please follow the below procedure.



# Initial assessment of a complaint

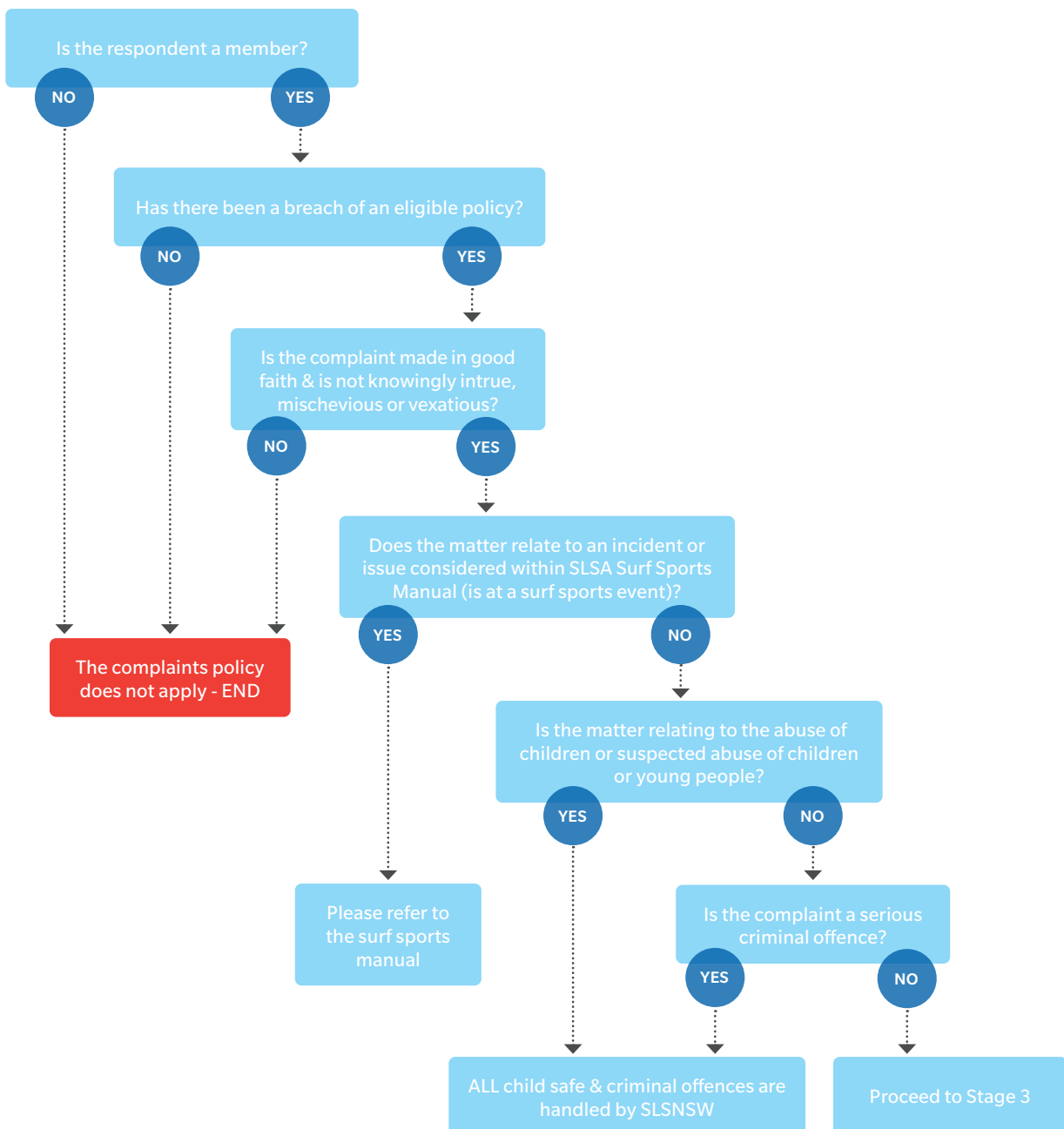
## STEP 1: The Complaints Manager determines if there is a conflict of interest

Is there a conflict of interest between the complainant and either the Complaints Manager or a PPA?  
*See Policy 6.06 for guidance*

**YES:** Consider referring the matter to the next level SLS entity

**NO:** Proceed to Step 2

## Step 2: The Complaints Manager determines whether the complaint falls under the Complaints Resolution Policy



**If criminal activity is suspected or the child is at immediate risk or danger, contact the police on 000 before contacting SLNSW.**

### Is the complaint lodged in good faith and a complaint under the policy?

**NO:** The complaints manager may reject the complaint with no further grounds for appeal. *END*

**YES:** The complaints manager must notify the complainant of the applicable processes to be used to resolve the complaint.

*NOTE:* There is no requirement for a Complaints Manager to undertake an investigation if the complaint is not considered to be made in good faith, relevant to the MPP policy or the information has not been supplied correctly.

### STEP 3: Investigation and provisional action

A complaints manager may undertake an investigation or appoint another person or entity to undertake the investigation.

*NOTE:* There is no requirement for a Complaints Manager to undertake an investigation if the complaint is not considered to be made in good faith, relevant to the MPP policy or the information has not been supplied correctly.

*NOTE:* Provisional action (i.e. restriction or suspension of duties) may be required in certain circumstances. See Policy 6.06: 5.5 P11 for details.

### Are the investigation results substantiated?

**NO:** Complaints Manager can reject the complaint. No further appeal. *END*

**YES:** Proceed to Step 4.

### STEP 4: Policy breach actions

Level 1 – Refer to Police and SLSNSW.

Level 2 – Determine options in the Complaints Policy 6.06.

Mediation (section 7.2), minor breach procedure (section 7.3), judiciary appointed (section 7.5), external referral (section 7.6)

### STEP 5: Sanctions

For a respondent to have sanctions imposed against them, a judiciary must be appointed to arbitrate the complaint. Respondents have the right of appeal to judiciary decisions.

## Outcome and finalisation

Complaints Managers must provide the complainant and respondent with written outcomes within 7 days of the process being concluded. Exceptions to this are for Level 1 complaints.

All records of complaints need to be documented and kept for a minimum of 3 years in secure confidential files.

The SLS online complaints system can be used for this.

Additional notes for an investigation:

- Ensure the respondent has been provided with enough information to formulate a response.
- Allow a support person if requested (but this cannot be anyone with legal qualifications).
- Run the investigation face to face, via video or phone.
- Findings must be based on standard of proof that is the balance of probabilities – ie. It is more probable than not that the alleged incident occurred.
- The draft report needs to be provided to all parties and further submissions allowed.
- Final report is then prepared for the Complaints Manager to decide on any actions.

*NOTE:* No irregularities of process or omission by the investigator invalidates the decisions pertaining to the complaint unless a person suffers significant prejudice by failure to comply with policy process.

### Resources

Complaints Managers should be familiar with the following policies and resources:

[SLSA Policy 6.04 – Child Safe](#)

[SLSA Policy 6.05 – Member Protection](#)

[SLSA Code of Conduct](#) (standalone document)

[SLSA Policy 6.06 – Complaints Resolution](#)

[SLSA Online Reporting System User Guide](#)