

RISK ASSESSMENT FOR CHILD SAFETY AT THE RV PARK

Background

CMCA has lodged a development application to develop a small-scale recreational vehicle park on council land adjacent to the Tenterfield Transport Museum on Francis Street Tenterfield. The RV Park would cater to approximately 25 vehicles at capacity.

This park is consistent with others within the CMCA RV Park national network and provides a wastewater dump point, potable water points, a barbecue shelter and level sites for parking on. The park would have a full-time on-site Park Custodian whose role is to check in guests, take new bookings, site guests and enforce park rules.

The guests of these types of parks are generally grey nomads and other older tourists travelling on budgets. These travellers are seeking somewhere cheap and safe to camp for a few nights, without the facilities that normal caravan and tourist parks provide. The Park Custodian will direct guests to follow park rules and if guests refuse to do so, CMCA head office staff can get involved.

CMCA RV Parks do not specifically cater to children as they don't provide recreational equipment, however they are not excluded from staying at the campground. The nature of the proposed RV Park is minimalist camping, providing basic facilities to allow those camping in fully self-contained vehicles somewhere low cost to stay for short periods.

Issues raised by School Principal

Concerns raised by the principal of the local primary school during her presentation to the March Council meeting about possible issues relating to this park being located close to the Tenterfield Primary School and possible child safety risks, are totally unfounded.

The complainant was unaware that the RV Park will have an on-site caretaker whenever it is open. This fact alone should negate the perceived issues that were raised in the presentation.

The concerns raised about child safety are speculation only with no evidence provided. She stated that she is not aware of any cases whereby caravan parks near schools have caused any child safety concerns but feels that this development should be rejected "just in case". Her specific concerns are:

- Transient nature of guests
- No vetting of guests
- Cannot monitor alcohol consumption of guests
- Cannot control the taking of photos where children may be the subject matter without consent
- Cannot scrutinise social media use of photos that could be of school children

These park guests are transient because they are tourists. These are the same tourists who stay at the nearby showground caravan park and other caravan parks in Tenterfield. They are the same people who stay in local motels. Being a tourist should not label a person as a risk, even though they are "transient". Given the CMCA RV Parks do not allow stays of longer than 14 nights, they do not attract people who are looking for low-cost social housing or long-term sites, such people are directed to caravan parks where longer stays are allowed.

CMCA does not undertake a check of its guests, not just because this is an invasion of privacy, but because the park does not cater specifically to children and therefore guests are not required to undertake such a check. We cannot ask a guest if they have a criminal record, and even if they did, they are still able to stay at caravan parks as any other traveller is able to.

The guests of these RV parks tend to arrive between 1pm and 3pm, get set up and then go to "happy hour" (4pm), enjoy the company of other travellers whilst sharing stories of travel over a barbecue. By the time happy hour arrives, the school has been vacated, and the school grounds are empty. The activities undertaken at the

RV Park in the evening and nights should be of no concern to the school because the school is only open between 8.00am and 3.00pm on weekdays. Drug and alcohol abuse are not issues that CMCA has had to deal with across its national RV Park network. The guests are tourists, staying in campgrounds for up to 2 weeks before moving on to their next destination. The average length of stay for guests is 2.3 nights. These are not itinerant people looking for cheap social housing, and the fact that CMCA parks do not provide amenities or powered sites limits the time a camper will stay at these parks before moving on to campgrounds with more facilities.

CMCA cannot control the taking of photos by its guests, but then anyone can drive/walk along the public streets near the school grounds and take photos without the subject's knowledge. The park is monitored by a Park Custodian and other guests also monitor activities within the park grounds. Suspicious activities within or outside the RV Park grounds would be noted and reported as necessary.

The concerns raised by the school principal are emotive and sensationalising to say the least. Words such as "significant threat to child safety", "wellbeing of our children" and "this scares me" are meant to create concern where there is no basis for this. Why would tourists be singled out as a higher risk purely because they are travelling through the region and choose to stay in Tenterfield for a few nights. Confusion over the type of accommodation being considered for this development leads to people assuming the worst. These parks are designed for short stays for people travelling in self-contained recreational vehicles, they are not where people will camp for extended periods because they do not provide the necessary amenity for longer stays (and are not allowed to as per CMCA Park Rules). Even though CMCA allows up to 14 night stays at its RV Parks, the majority of campers will choose to stay for less than 3 nights.

When the school principal was asked directly by a councillor "what is the potential threat to school children" the response was a "foreseeing of potential problems" even though no history of this could be cited and that she was "making assumptions". When asked if there had been any complaints against showground campers located on Francis Street, the response was "no", and yet these are the same types of people who would utilise the CMCA RV Park.

Child Safety Assessment Report

Tenterfield Shire Council has requested that CMCA provide an independent Child Safety Assessment Report in relation to the RV Park proposal. Tenterfield Shire planners were unable to provide a report template because such a report has never been requested for a development application of this nature. It should be noted that the Tenterfield Transport Museum located on Francis Street attracts the same demographic as this planned RV Park, yet the development application for that project was not subjected to these complaints.

CMCA has contacted a national company called ChildSafe Consulting. This company has provided the following advice in relation to this matter:

- Child Safety Assessments relate to specific individuals that may be considered at risk
- Such assessments do not relate to campgrounds or caravan parks
- The Child Safety Standards Act does not apply to the CMCA RV Park in this instance because the park does not cater specifically to children and does not provide any facilities specifically for children
- An assessment cannot be undertaken that considers children outside of the business premises because those children are not the responsibility of CMCA and are not involved in the business operation of CMCA
- Once someone leaves the premises controlled by CMCA, we have no control over their actions and are not responsible for them

With the above in mind, CMCA offers this information as clarification of the operation and management of the proposed RV Park and as mitigation of the concerns raised in submissions against the proposal.

1. Cohort of guests

The guests who use the CMCA RV Parks are generally older travellers also known as "grey nomads". They are using these low-cost RV Parks as stops within longer trips to reduce the overall cost of travelling. These tourists generally have limited budgets or plan their trips around a mixture of commercial caravan parks, free camping and CMCA low-cost RV Parks. The majority of guests are CMCA members, who are well aware of the CMCA RV

Park model and are comfortable with using these parks for short periods. Non-members are welcomed also (at a higher site fee), as this is seen as an opportunity to convert them to be members of CMCA, the largest RV lifestyle club in Australia. The one-off joining fee of \$25.00 is waived for those who join the club whilst staying at one of our RV Parks, an incentive to join and then take advantage of other Club benefits.

2. This is not a caravan park

Although council has determined that this proposal must be assessed as a caravan park, it does not operate as a traditional caravan park. There are minimal facilities provided, and all vehicles must provide their own amenities within their vehicles. Because there are minimal facilities, the RV Parks do not suit families. Although families are not excluded from these parks, they will tend to stay at caravan parks where there are facilities for children.

3. No amenities are provided

There are no on-site amenities within the RV Park, all guests must provide their own facilities within their vehicles. CMCA does not allow external shower tents or toilet tents either, and there is no camping outside of the vehicle or under the awnings of these vehicles. There are no shower blocks and no enclosed buildings within the development.

4. Communal barbecue area

A communal covered barbecue area is provided for park guests only, which includes a 9m x 6m carport on concrete slab. A solid wall can be installed on the sides facing Francis Street and Douglas Street to shelter park guests from passing traffic and colder southerly winds. This will also provide a physical barrier from the school sports ground across Francis Street.

5. Park Custodian

CMCA provides an on-site Park Custodian at each of its RV Parks, who man the parks whilst they are open. This is a supervised campground with established and consistent rules across the entire CMCA RV Park network. Guests must abide by these rules to remain at the park, and any visitors must also abide by these rules and are the responsibility of the guest they are visiting. Park rules are signposted at the entrance to the RV Park and also handed out to new guests. The Custodian enforces these rules and has the support of CMCA head office staff if there is any need to discipline guests or remove them from the park grounds.

6. Register of guests

All valid bookings have details of at least one of the guest party. This information includes the names of the guests, primary mobile phone number, email address and registration details of the vehicle.

7. Secure

The park includes fencing to the perimeter and a gated entrance which is closed at night.

8. A commercial caravan park already exists on Francis Street

The showground caravan park is located 100m to the north of the proposed RV Park with its access from Francis Street as well. The caravan park guests can access the primary school grounds also, however there has never been an incident reported that the school principal has been made aware of.

Summary

The above information is provided to Tenterfield Shire Council to reinforce the fact that these RV Parks are a safe place for guests and should be considered as low risk for the primary school and its students.

Following discussions with ChildSafe Consulting, a Child Safety Assessment Report cannot be provided to support this development application. The information provided in this report should be sufficient to alleviate any concerns council might have in terms of risk to those outside of the RV Park grounds.