

PUNCHBOWL CHRISTADELPHIAN ECCLESIA INCORPORATED

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Safeguarding Children Policy

June 2025

This document represents the *Safeguarding Children Policy* of Punchbowl Christadelphian Ecclesia Incorporated (the Ecclesia). The Ecclesia is governed by Laws applicable to the Commonwealth and New South Wales (NSW).

This *Policy* supersedes the Ecclesia's previous Child Safety Policy dated 1 September 2020.

The Ecclesia may implement further procedures relating to Child safety if these are consistent with this *Policy*.

Documents relevant to this *Policy* include Appendices A – K, attached.

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1. Introduction and Commitment

- 1.1. Children are a heritage from the Lord (Psalm 127:3) and should be cherished and nurtured by families and the Ecclesia. Table 1 lists Bible passages that underpin this *Policy*.
- 1.2. The Ecclesia is committed to:
 - 1.2.1. providing a Child-friendly Ecclesial Environment where Children feel and are safe, including from Abuse; and
 - 1.2.2. acting in the best interests of Children in its care.The Ecclesia has zero tolerance for Child Abuse.
- 1.3. The Ecclesia acknowledges the responsibility for families and the Ecclesia to work together to provide a harmonious environment for Children within the Ecclesial Environment which respects their safety and wellbeing.
- 1.4. [Appendix A](#) defines terms used in this *Policy*.

Table 1: Foundation Bible passages which form a basis of this *Policy*

Bible Teaching	References
The Bible teaches that children are God's heritage.	Matthew 19:14; Psalm 127:3
The Bible teaches that we should "do all to the glory of God". This provides an overarching principle and guide for planning, managing and deciding matters within the Ecclesia.	1 Corinthians 10:31
The Bible teaches that we should follow the commandments of Christ and strive to develop the fruit of the spirit.	John 14:15; 15:14; Galatians 5:22-24; Ephesians 4:17-20; Philippians 4:8
The Bible teaches that we are to be holy and abstain from all appearance of evil.	1 Peter 1:15-16; 1 Thessalonians 5:22
The Bible teaches that all forms of abuse, including Child Abuse, violate the commandments of Christ and are contrary to the fruit of the spirit.	Galatians 5:19-21; Ephesians 5:3-12; 1 Corinthians 6:9-10
The Bible teaches that we are to love God with all our heart, soul, mind and strength, and to love our neighbour as our selves.	Deuteronomy 6:4-5; Leviticus 19:18; Matthew 19:19; 22:37-39; Mark 12:29-31; Luke 10:27; Romans 13:9; Galatians 5:14; James 2:8
The Bible teaches that we should obey the laws of the land in which we live, unless they directly contravene the teachings of the Bible.	Romans 13:1-5; Matthew 22:21; Acts 5:29
The Bible teaches that we have particular responsibility to care for those in the Ecclesia who may be vulnerable or may have special needs.	Psalm 82:3-4; Proverbs 31:8-9; Acts 20:35; James 1:27
The Bible teaches that those who oversee the Ecclesia are responsible to care for it as " <i>shepherds of God's flock</i> " and protect it from " <i>wolves</i> ".	Acts 20:28-32; 1 Peter 5:2-4
The Bible teaches that the Ecclesia should seek to recover those who are " <i>overtaken in a fault</i> " and " <i>err from the truth</i> ".	Galatians 6:1; James 5:19-20

2. Key Contact Details

Table 2: Key Contacts

NSW Police	If any person believes a Child is at immediate risk of Abuse or Harm, contact NSW Police as soon as practicable on 000
	Contact the NSW Police Assistance Line for all non-emergency related matters on 131 444
Child Protection Service	If any person believes, on Reasonable Grounds, that a Child is at risk of significant Harm, contact the Child Protection Helpline on 13 21 11
The Ecclesia's Safeguarding Representative	Adrian Russell, Steven Wolstencroft or Barry McClure. <i>(Note: in the case of an emergency or the risk of significant Harm, NSW Police or the Child Protection Helpline should be contacted first, after which the Ecclesia's Safeguarding Representative or another member of the Management Committee should be contacted)</i>

3. Scope

This *Policy*:

- 3.1. Applies to all Members and Non-Members, including Parents, Children, Employees, contractors and Volunteers involved or engaged in an Activity of the Ecclesia.
- 3.2. Extends to all aspects of Ecclesial Activities, including within the Ecclesia's physical and online (virtual) environment.

4. Aim

4.1. This *Policy* aims to:

- 4.1.1. Prevent Child Abuse occurring within the Ecclesial Environment and provide a clear statement forbidding such Abuse.
- 4.1.2. Build an Ecclesial culture that promotes Child safety and wellbeing, and supports Members and, where applicable, Non-Members who Work with Children.
- 4.1.3. Ensure all Members are aware of their responsibilities for the safety of Children within the Ecclesial Environment and Reporting where there is Reasonable Belief that a Child has been, is being, or is at risk of being, Abused.
- 4.1.4. Establish controls and procedures for safeguarding Children and preventing Child Abuse occurring within the Ecclesial Environment, or detecting such Abuse when it occurs.
- 4.1.5. Provide guidance on action to be taken where there is Reasonable Belief of Child Abuse.
- 4.1.6. Provide assurance that where there is Reasonable Belief a Child has been, is being, or is at risk of being, Abused, this will be Reported and investigated
- 4.1.7. Identify requirements for the management of Complaints involving Children.
- 4.1.8. Provide guidance for:
 - a) Supporting victims of Child Abuse and their families; and

- b) Managing alleged or convicted Offenders.

4.1.9. Demonstrate compliance with applicable Child safety Laws.

5. Principles

5.1. The Ecclesia affirms the following principles which are reflected in this *Policy*:

- 5.1.1. Child Abuse violates Bible teaching (refer to section 1) and is defined by Law as criminal behaviour. The Ecclesia does not tolerate or condone such criminal behaviour.
- 5.1.2. In all matters relating to Children, including management of Complaints, the safety and wellbeing of Children is essential.
- 5.1.3. Parents have primary responsibility for the care, safety, upbringing and development of their Child and should participate in decisions affecting their Child.
- 5.1.4. Everyone in the Ecclesia is responsible for providing a Child safe environment and Reporting where there is Reasonable Belief that a Child has been, is being, or is at risk of being, Abused.
- 5.1.5. The Ecclesia will strive to be sensitive, objective, confidential, fair, truthful and compliant in a matter related to Child Abuse, alleged or proven.
- 5.1.6. The Ecclesia will provide or help facilitate support to people affected by Child Abuse, alleged or proven.
- 5.1.7. The Ecclesia supports the National Principles for Child Safe Organisations (NP), which are based on the Child Safe Standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse¹. Requirements and processes in [Appendix B](#) are grouped under subheadings which relate to each of the National Principles.

6. Responsibilities

6.1. The Ecclesia's Management Committee

- 6.1.1. The Management Committee has primary responsibility for implementing processes for the care and safety of Children at Ecclesial Activities. Parents have primary responsibility for the care and safety of their Children at Ecclesial Activities where they are present.
- 6.1.2. The Management Committee must:
 - a) Provide leadership in Child safety within the Ecclesial Environment;
 - b) Implement processes for the safety and wellbeing of Children at Ecclesial Activities. This includes discussing Child safety at formal Committee meetings and relevant meetings with Activity Coordinators, Youth Workers and other Members and Non-Members involved in Child-Related Work;
 - c) Communicate requirements of this *Policy* to Members and, where applicable, to Non-Members;
 - d) Ensure people involved in Working with Children at Ecclesial Activities are suitable and supported;
 - e) Strive to ensure Complaints of Child Abuse within the Ecclesial Environment are managed appropriately and in accordance with the Law;
 - f) Provide support to the Ecclesia's Safeguarding Representative in responding to and handling a Complaint of Child Abuse;
 - g) Implement a risk management framework to minimise safety risks to Children at Ecclesial Activities, including risk of Abuse (refer to [Appendix J](#));

¹ McClellan, Hon. Justice P. et al (2017). *Royal Commission into Institutional Responses to Child Sexual Abuse: Final Report*. Canberra, ACT: Commonwealth of Australia

- h) Conduct annual review of this *Policy*; and
- i) Ensure the Ecclesia is compliant with its:
 - (i) legal obligations (as per [Appendix I](#))
 - (ii) Record keeping responsibilities (as per section 7 of the *Policy*).

6.1.3. The Management Committee may appoint an Adult or Adults to be the Ecclesia's Safeguarding Representative under their direction. If the Management Committee does not appoint a person to perform this function, they also have the responsibilities in section 6.2.

6.2. Ecclesia's Safeguarding Representative (Safeguarding Representative)

6.2.1. The Safeguarding Representative is an Adult or Adults appointed by the Management Committee (please refer to Table 2 on page 3 of this *Policy* for details).

Note: *The Safeguarding Representative does not carry sole responsibility for safeguarding Children within the Ecclesial Environment. This is a shared responsibility as per sections 5.1 and 6.1 of this Policy.*

6.2.2. The Safeguarding Representative is responsible for:

- a) Coordinating administrative requirements of this *Policy*;
- b) Responding to, handling and managing Complaints relating to Abuse of Children within the Ecclesial Environment;
- c) Escalating Child Abuse Complaints to the Appropriate Authorities, with support from the Management Committee and in accordance with the Child Safety Complaints Handling Procedure (refer to [Appendix F](#));
- d) Overseeing the investigation process for Child Abuse Complaints within the Ecclesial Environment;
- e) Providing or helping facilitate support to anyone who Reports a Child Abuse matter within the Ecclesial Environment;
- f) Communicating with affected parties involved in the Complaint; for example, the Child, the Parent/s of the affected Child, or the affected individual and their family; and
- g) In conjunction with the Management Committee, providing or helping facilitate support to Children who are victims of Abuse within the Ecclesial Environment and, if appropriate, their families (eg via access to professional services).

6.2.3. The Safeguarding Representative must:

- a) Understand Child safety Laws and procedures outlined in [Appendix I](#), including requirements for Working with Children Checks (WWCCs) and Mandatory Reporting;
- b) Facilitate WWCCs on behalf of the Ecclesia;
- c) Maintain and confirm Records of WWCCs on behalf of the Ecclesia in accordance with requirements (refer to [Appendix I](#));
- d) Coordinate Child safe Training or education for Adults engaged by the Ecclesia to Work with Children; and
- e) Advise the Management Committee if/when they become aware of changes in the Law or associated requirements which may necessitate revision of this *Policy*.

6.3. Activity Coordinators

6.3.1. An Activity Coordinator is an Adult appointed by the Management Committee to coordinate an Activity of the Ecclesia which involves Child-Related Work.

6.3.2. For the Ecclesial Activity they are to coordinate, an Activity Coordinator must:

- a) Ensure Adults Working with Children at the Activity have WWCCs;

- b) Develop and/or implement a risk assessment to minimise safety risks to Children at the Activity; and
- c) Report to the Appropriate Authorities (refer to [Appendix I](#)) if they have a Reasonable Belief that a Child has been, is being, or is at risk of being, Abused.

6.3.3. Activity Coordinators who are Youth Workers also have the responsibilities in section 6.4.

6.4. Youth Workers

6.4.1. A Youth Worker is an Adult appointed by the Management Committee to Work with Children or Youth at an Activity of the Ecclesia.

6.4.2. Youth Workers must:

- a) Maintain a current WWCC;
- b) Complete Child safe Training or education arranged by the Ecclesia;
- c) Develop and/or implement a risk assessment to minimise safety risks to Children at the Activity; and
- d) Report to the Appropriate Authorities (refer to [Appendix I](#)) if they have a Reasonable Belief that a Child has been, is being, or is at risk of being, Abused.

6.4.3. Youth Workers who are Activity Coordinators also have the responsibilities in section 6.3.

6.5. Ecclesial Members

6.5.1. All Members, including those referred to in sections 6.1. to 6.4. above, must:

- a) Comply with relevant requirements of this *Policy*;
- b) Comply with the Ecclesia's Code of Conduct, including for interactions with Children (refer to [Appendix D](#));
- c) Provide a safe environment for Children in the Ecclesia, including minimising safety risks to Children;
- d) Not spend time alone with a Child if not the Child's Parent (eg when Working with Children, a Member should be in Public View or be in the presence of at least one other Adult or the Parent of the Child);
- e) Report to the Appropriate Authorities (refer to [Appendix I](#)) if they have a Reasonable Belief that a Child has been, is being, or is at risk of being, Abused; and
- f) Report any safety risks to Children to the Safeguarding Representative or a member of the Management Committee.

6.6. Non-Members

6.6.1. Non-Members engaged by the Ecclesia in Child-Related Work must:

- a) Comply with relevant requirements of this *Policy*;
- b) Comply with the Ecclesia's Code of Conduct, including for interactions with Children (refer to [Appendix D](#));
- c) Maintain a current WWCC;
- d) Report to the Appropriate Authorities (refer to [Appendix I](#)) if they have a Reasonable Belief that a Child has been, is being, or is at risk of being, Abused; and
- e) Report any safety risks to Children to the Safeguarding Representative or a member of the Management Committee.

7. Record Keeping

- 7.1. The Ecclesia must complete and keep accurate Records of:
 - a) All Child-related safety Complaints for a minimum of 10 years; and
 - b) Serious allegations of Child Abuse for a period of 45 years.
- 7.2. The Ecclesia must ensure that Records are:
 - a) Dealt with in accordance with relevant Laws such as the Privacy Act 1988 (Cth);
 - b) Maintained appropriately (eg in a systematic way) and confidentially;
 - c) Preserved in a suitable physical and/or digital environment that ensures Records are not subject to degradation, loss, alteration, corruption or deletion;
 - d) Available for Adults who have the right to access Records which contain their personal information;
 - e) Stored securely (physical Records);
 - f) Stored in a password-protected file (digital Records); and
 - g) Maintained and disposed of in accordance with legal requirements.
- 7.3. The Management Committee will ensure that affected Members and, where applicable, Non-Members are aware of their rights regarding the collection of data, information sharing and Record keeping.

8. Breaches of this Policy

- 8.1. The Management Committee will respond promptly to a Breach and manage the process in a fair and objective manner.
- 8.2. Depending on the nature/circumstances of the Breach, the Management Committee may take the following actions:
 - a) Where appropriate, conduct mediation between the parties involved in the incident;
 - b) Provide Training or education to Members and, where applicable, Non-Members, with emphasis on the section of the *Policy* that was breached;
 - c) Restrict a person's duties or attendance at activities;
 - d) Provide closer supervision;
 - e) Review this *Policy* and related processes, with updates if deemed necessary; and/or
 - f) Other action as deemed appropriate by the Management Committee.
- 8.3. Details of the Breach will be Recorded and kept confidential (unless the Management Committee is required by Law to disclose, depending on the nature/circumstances of the Breach).

9. Related Policies and Procedures

- 9.1. This *Policy* should be read in conjunction with the attached Appendices.

10. Relevant Legislation

- 10.1. Refer to [Appendix I](#).

11. Revision History

Table 3: Document Change History

Version	Change Details	Date of Issue
1.0	Initial Child Protection Policy	1 July 2005
2.0	Policy updated	1 August 2014
3.0	<ul style="list-style-type: none">Policy renamed and updated, including a general revision to align with the Child Safe Standards and recommendations for religious institutions in the final report of the Royal Commission into Institutional Responses to Child Sexual Abuse.Added Punchbowl Ecclesia's Code of Conduct, Risk Management Policy and Procedures and Pastoral Care Policy and Procedures as appendices.	1 September 2020
4.0	<ul style="list-style-type: none">Policy renamed <i>Safeguarding Children Policy</i>.Policy and appendices updated or added to reflect changes in Legislation and information provided by the Association of Australian Christadelphian Ecclesias Inc.	1 June 2025

Appendix A: Definitions

- A.1. Terms used in this *Policy* have the meaning given in Table 4.
- A.2. Definitions which include '(Source: RCIRCSA)' are as given in the glossary in the final report of the Royal Commission into Institutional Responses to Child Sexual Abuse.²
- A.3. Definitions which include '(Source: AIFS)' are as given by the Australian Institute of Family Studies.³
- A.4. Sources for other definitions are as given.

Table 4: Definitions

Term	Definition/Source
Abuse	Refers to acts or omissions (neglect) that result in, or have the likelihood to result in, Harm to a Child. The forms of Child Abuse are sexual Abuse (including grooming), emotional Abuse, neglect, physical Abuse and exposure to family violence. ⁴ Refer to Appendix C for specific definitions, examples and possible signs of each form of Abuse (Source: AIFS).
Activity/Activities of the Ecclesia	An event or events organised by the Ecclesia for its Members (which may include Children). The event/s may not necessarily be at the Ecclesia's place of meeting and may include those occurring on the online environment. An event organised by a Member or Non-Member as a private function (such as a family gathering or activities within the home environment) is not an Ecclesial Activity.
Adult	A person who is 18 years of age or older.
Appropriate Authorities	Government agencies authorised by Law to receive, investigate and respond to Complaints of Child Abuse and/or have a responsibility for Child safety (refer to Appendix I).
Breach	An action or inaction by a person which contravenes this <i>Policy</i> (including the Code of Conduct).
Caregiver	See Parent.
Child/Children	A human being below the age of 18 years unless, under the Law applicable to the Child, majority is attained earlier. (Source: UN Convention on the Rights of the Child) ⁵ . Note: In NSW, a Child is a person under the age of 16 years for Mandatory Reporting purposes (refer to Appendix I).
Child Abuse	See Abuse.
Child-Related Work	See Work/s/Working with Children.

² Royal Commission into Institutional Responses to Child Sexual Abuse, *Our Inquiry: Vol 1*, 2017, p 319.

³ Australian Institute of Family Studies, *What is Child Abuse and Neglect?*, 2018, <https://aifs.gov.au/resources/Policy-and-practice-papers/what-Child-Abuse-and-neglect>.

⁴ Australian Institute of Family Studies, *What is Child Abuse and Neglect* (2018), <https://aifs.gov.au/cfca/publications/what-Child-Abuse-and-neglect>.

⁵ Convention on the Rights of the Child, adopted and opened for signature, ratification and accession by General Assembly resolution 44/25 of 20 November 1989. United Nations Office of the High Commissioner for Human Rights. Retrieved 5 October 2018 from <https://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>.

Term	Definition/Source
Complaint/s	<p>Includes any allegation, suspicion, concern or report of a Breach of this <i>Policy</i> in relation to a Child. It also includes Disclosures made to the Ecclesia that may be about or relate to Child Abuse within the Ecclesial Environment.</p> <p>The Ecclesia may receive a Complaint:</p> <ul style="list-style-type: none"> • Directly or through a redress scheme; • From anyone; a Child, Adult survivor, Parent, Adult, independent support person, Employee, contractor, Volunteer, Member or Non-Member; • About an Adult allegedly perpetrating Child Abuse or about a Child exhibiting harmful behaviours; or • In writing, verbally or because of other observations, including behavioural signs. <p>A Complaint may become a Report to an external authority or agency. (Source: RCIRCSA, with 'institution' replaced by 'Ecclesia').</p>
Disclosure/s	<p>A process by which a Child conveys or attempts to convey that they are being or have been Abused, or by which an Adult conveys or attempts to convey that they were Abused as a Child.</p> <p>This may take many forms and might be verbal or non-verbal. Non-verbal Disclosures using painting or drawing, gesticulating or through behavioural changes, are more common among young Children and Children with cognitive or communication impairments. Children may also seek to disclose Abuse through emotional or behavioural cues, such as heightened anxiety, withdrawal, aggression or inappropriate behaviour.</p> <p>Disclosures can be intentional or accidental, and they might be prompted by questions from another person or triggered by a memory of the Abuse. A Disclosure may also become a Complaint when made to the Ecclesia or a Report when made to an external authority or agency. (Source: RCIRCSA, with 'institution' replaced by 'Ecclesia').</p>
Ecclesial Activity/Activities	See Activity/Activities of the Ecclesia
Ecclesial Environment	The environment in which Activities of the Ecclesia take place. It includes both the physical and online environments. See also Activity of the Ecclesia.
Employee/s	A person appointed or contracted by the Ecclesia to perform an Activity of the Ecclesia, whether in a paid or voluntary capacity. They may or may not be a Member.
Guardian	See Parent.
Harm	A detrimental effect to a Child's safety or wellbeing caused by Abuse.
Law/s	The Law/s of the Commonwealth of Australia or NSW (Source: RCIRCSA).
Legislation	Acts and regulations (Source: RCIRCSA).
Management Committee	A group of Members (referred to as Arranging Brethren) appointed by the Ecclesia to oversee and manage its affairs.

Term	Definition/Source
Mandatory Reporting	Refers to the legislative requirement of an individual of a certain profession to make a Report to the Appropriate Authorities if they form a Reasonable Belief that a Child has experienced or is at risk of experiencing Child Abuse. Refer to Appendix I for guidance (Source: AIFS).
Member	A person listed as an active Member on the Ecclesia's Membership register. A Member may also be engaged by the Ecclesia as an Employee.
Non-Member	Employees, contractors and Volunteers who are not Members of the Ecclesia but are engaged by the Ecclesia for an Activity of the Ecclesia.
Offender	A person who is found by a court to have done something that is prohibited by Law (Source: RCIRCSA).
Parent/s (can also include Caregiver/s or Guardian/s)	The Child's mother, father or someone else having or exercising Parental responsibility for the Child (eg a Child's grandparents, aunty or uncle). A Parent of an Aboriginal or Torres Strait Islander Child includes a person who under Aboriginal or Islander custom is regarded as a Parent of the Child.
Perpetrator	A person who has Abused a Child (Source: RCIRCSA).
Public View/Publicly Visible	Means anything which is visible to others while they are in, or passing through or along, any place, or where ordinarily public movement is routine. This may include within eyesight of other Adults or open space where other Adults are ordinarily present or passing through.
Reasonable Belief/Reasonable Grounds	Facts or evidence which would lead a reasonable person to think that there is a Risk of Harm to a Child based upon indicators such as those outlined in Appendix C . It does not require certainty, but it should be more than suspicion (ie the person has some objective basis for the belief).
Record	Information created, received and maintained as evidence and/or as an asset by an organisation or person, in pursuance of legal obligations or in the transaction of business or for its purposes, regardless of medium, form or format (Source: RCIRCSA).
Report/Reports/Reported/Reporting	Where concerns relating to Child Abuse are notified to an authority or agency external to the Ecclesia; for example, where a person or institution notifies the NSW Police, a Child Protection Agency, an oversight agency or a professional or registration authority (Source: RCIRCSA, with 'institution' replaced by 'Ecclesia').
Reportable Conduct/Allegation/s	Conduct that must be Reported under Legislation that obliges designated institutions to Report allegations of Reportable Conduct to an independent statutory body (Source: RCIRCSA).
Reportable Conduct Scheme	A scheme established under state Legislation to monitor, investigate and Report on Reportable Conduct.
Risk of Harm	Circumstance where there is a likelihood of Harm to a Child.

Term	Definition/Source
Secondary Victim	People who are affected by the Abuse perpetrated against the primary victim (the Child who is Abused). Secondary victims can include partners, Children (including Children born as a result of the Abuse), Parents, siblings and extended family. Trauma impacts can extend across generations and there may also be collective trauma impacts for whole communities or populations. The impacts of Abuse can also be felt by a wider range of people, including whistleblowers and other people (including other Children) within the institution where the Abuse occurred (Source: RCIRCSA).
Secretary	The Member appointed by the Management Committee to coordinate Ecclesial administration (referred to as Recording Brother).
Sexual Offending	Sexual behaviours that fall within the definition of a sexual offence under Australian Law, where the person could be held criminally responsible for their conduct (Source: RCIRCSA).
Sunday School Superintendent	The Member appointed by the Management Committee to coordinate the Sunday School within the Ecclesial Environment.
Sunday School Teacher	A Youth Worker.
Training	Provision for those involved in Working with Children at Ecclesial Activities to understand their responsibilities under this <i>Policy</i> .
Unity Basis	<i>Unity in Australia: The Accepted Basis</i> , ⁶ the basis upon which Christadelphian Ecclesias in the Central Fellowship in Australia agree to relate to each other and conduct some of their affairs.
Volunteer	See Employee.
Working with Children Check (WWCC)	A WWCC is a background check for people seeking to engage directly in Child-Related Work. It aims to prevent people from working or volunteering with Children if Records indicate that they may pose an unacceptable level of risk to Children. ⁷ Note: Refer to Appendix I for NSW requirements.
Work/s/Working with Children (also referred to as Child-Related Work)	Providing services for Children where: <ul style="list-style-type: none"> the work normally involves being face to face with Children contact with Children is a normal part of, and more than incidental to, the work (Source: NSW Office of the Children's Guardian, May 2025).
Youth/Young Person/Young People	A teenager who is a Child. Note: This term is used in recognition that a teenager may not identify as being a Child, notwithstanding the definition.

⁶ *Unity in Australia: The Accepted Basis*, with special reference to the work of the late Brother John Carter towards reunion in 1958. First Edited and Published by the Australian Christadelphian Central Standing Committee 1963. Reprinted by the Australian Christadelphian Committee 1999. Reprinted by the Association of Australian Christadelphian Ecclesias 2010.

⁷ Royal Commission into Institutional Responses to Child Sexual Abuse, *Working with Children Checks Report*, 2015, p 3.

Appendix B: Implementing the National Principles for Child Safe Organisations

Note: Subheadings NP 1 to NP 10 each relate to one of the ten National Principles (NP) for Child Safe Organisations.⁸

NP 1: CHILD SAFETY IS EMBEDDED IN INSTITUTIONAL LEADERSHIP, GOVERNANCE AND CULTURE

- 1.1. The Ecclesia has a statement of commitment to Child safety and makes this publicly available.
- 1.2. The Ecclesia has a Code of Conduct which includes standards of behaviour for interactions with Children.
- 1.3. The Management Committee reviews and approves nominations for any person who Works with Children at Ecclesial Activities. This may include:
 - (a) Sunday School superintendent;
 - (b) Youth Workers, including Sunday School teachers (and relief teachers);
 - (c) Activity Coordinators at Ecclesial Activities which involve Child-Related Work
- 1.4. The Management Committee provides oversight of Ecclesial Activities to minimise safety risks to Children. 'Safeguarding Children' is a standing agenda item at formal Committee meetings.
- 1.5. The Management Committee promotes Child safety and makes information available to Members and, where appropriate, Non-Members.
- 1.6. The Management Committee offers support to anyone implementing any aspect of this *Policy* on behalf of the Ecclesia.

NP 2: CHILDREN PARTICIPATE IN DECISIONS AFFECTING THEM AND ARE TAKEN SERIOUSLY

- 2.1. The Ecclesia recognises the importance of engaging with Children, as age-appropriate, in processes designed to promote their safety. This may include consulting with Children about what makes them feel safe and how this can be implemented at the Ecclesia.
- 2.2. The Management Committee endeavors to implement age-appropriate strategies so that Children involved in Ecclesial Activities:
 - (a) Are safe and feel safe;
 - (b) Are aware that the Ecclesia has processes in place for their wellbeing and safety;
 - (c) Understand what is and is not appropriate behaviour toward them from peers and Adults;
 - (d) Understand how and to whom they can report concerns about their wellbeing and safety;
 - (e) Feel confident that any questions or concerns they have about their wellbeing and safety will be taken seriously and responded to promptly; and
 - (f) Know where they can access further information or support services.

Note: *The Management Committee will communicate with Parents on how best to convey this information. Information should be provided in a way that is appropriate to the Child's age, ability and understanding. Children should be encouraged to discuss and ask questions (eg with their Parents, as appropriate).*

- 2.3. The Ecclesia displays contact details for helpline services.

NP 3: FAMILIES AND COMMUNITIES ARE INFORMED AND INVOLVED

- 3.1. The Management Committee must inform anyone with a responsibility under this *Policy*.
 - (a) About the *Policy* and make it available to them; and

Note: *The Ecclesia may make the Policy available to other parties at the Management Committee's discretion.*

- (b) About *Policy* requirements that particularly apply to their role in Ecclesial Activities.

⁸ Australian Human Rights Commission, *National Principles for Child Safe Organisations*, (2018), <https://Childsafe.humanrights.gov.au/national-principles>

3.2. The Management Committee must:

- (a) Inform all Members (including those seeking Membership) about this *Policy* and make it available to them; and
- (b) Provide opportunity for Members to communicate specific needs, issues or risks involving Children, including enhancing safety.

3.3. The Management Committee supports families to take an active role in ensuring and monitoring the safety and wellbeing of Children at Ecclesial Activities by communicating the following:

- (a) This *Policy*, including the Child safety responsibilities of Parents and Adults Working with Children; and
- (b) How, when and to whom Complaints should be made.

3.4. The Management Committee communicates Child safety information to Members and families. This may include presentations, information sheets or emails.

3.5. The Management Committee seeks feedback from Parents/families on Child safety, including opportunities to further enhance Child safety at Ecclesial Activities.

NP 4: EQUITY IS UPHOLD AND DIVERSITY IS TAKEN INTO ACCOUNT

4.1. The Ecclesia recognises and respects the diverse backgrounds and needs of families and their Children.

4.2. The Ecclesia acknowledges that each Child and their family have their own unique identity shaped by personal characteristics, circumstances, life experiences and backgrounds. Accordingly, the Ecclesia recognises that the level of support required by each Child and their family may vary.

4.3. The Ecclesia understands barriers that may prevent Children from disclosing Abuse, including:

- (a) Age
- (b) Cultural background
- (c) Cognitive capabilities
- (d) Communication needs
- (e) Impaired intellectual or physical functioning
- (f) Low levels of literacy or education.

4.4. The Management Committee implements strategies to foster a safe environment and the participation of Children and their families at the Ecclesia who have diverse needs. These may include:

- (a) Providing Children and their families with access to translation services (if needed) to raise concerns or report a Complaint;
- (b) Providing accessible Child safety information in key community languages (if needed);
- (c) Accessing cultural advice or disability support (where required); and
- (d) Delivering Child safe Training or education to Members on how to respond to the diverse needs of Children and their families (where relevant).

4.5. The Management Committee offers support to an Adult who alleges they were Abused when a Child. This may include assisting them to access appropriate professional counselling and encouraging them to make a Report to the Appropriate Authorities.

NP 5: PEOPLE WORKING WITH CHILDREN ARE SUITABLE AND SUPPORTED

5.1. The Ecclesia implements a Child Safe Engagement, Induction and Training Procedure (refer to [Appendix E](#)):

- (a) When appointing Members to Work with Children (such as Sunday School superintendent, Youth Workers);

- (b) When engaging Adults who are Non-Members to Work with Children.
- 5.2. To Work with Children within the Ecclesial Environment, an Adult must have met the following legal requirements prior to commencing this Work.
- (a) A WWCC (or equivalent) must be obtained.
 - (b) If the person has a WWCC (or equivalent) associated with another organisation, it must also be associated with the Ecclesia.
 - (c) A person who is exempt by Law from a WWCC (or equivalent) because of their profession or occupation may still require a WWCC if their Work with Children at Ecclesial Activities is unrelated to their profession or occupation.
- Note:** Refer to [Appendix I](#) for WWCC requirements in NSW. WWCCs are not transferrable between States and Territories. A person with the equivalent of a WWCC from another State or Territory must apply for a WWCC in NSW.
- 5.3. The Management Committee may request an applicant to sign an authority allowing the Ecclesia to conduct a search to determine whether they have a criminal Record, and, if authority is granted, promptly conduct this search (or any other search as required by Legislation).
- 5.4. An Adult who Works with Children must advise the Management Committee:
- (a) If they have a Child-related Complaint made against them (whether related to Ecclesial Activities or not); and/or
 - (b) If their WWCC is withdrawn, suspended, cancelled or has lapsed.
- 5.5. In addition to requirements in section 5.4 above, an Adult must not Work with Children:
- (a) If they have been a Member for less than three months unless otherwise approved by the Management Committee;
 - (b) If they are the subject of an unresolved Complaint;
 - (c) If the Management Committee has directed that their contact with Children be restricted at Ecclesial Activities; or
 - (d) If they have a prior conviction of violent crime or sexually related offence.
- Note:** Paragraph b) does not apply to Complaints which have been dismissed, withdrawn or disproved. Paragraph d) applies even when the sentence for a conviction has been served.
- 5.6. The Ecclesia must maintain a register of the status of WWCCs for Adults who Work with Children within the Ecclesial Environment (refer to [Appendix I](#)).

NP 6: PROCESSES TO RESPOND TO COMPLAINTS OF CHILD ABUSE ARE CHILD-FOCUSED

- 6.1. The Ecclesia responds promptly to concerns about the safety of Children and treats Complaints seriously, respectfully and sensitively. All Child safety Complaints are dealt with in accordance with the procedure outlined in [Appendix F](#).

NP 7: STAFF ARE EQUIPPED WITH THE KNOWLEDGE, SKILLS AND AWARENESS TO KEEP CHILDREN SAFE THROUGH CONTINUAL EDUCATION AND TRAINING

- 7.1. The Management Committee provides Child safe Training or education to any Adult whose role within the Ecclesial Environment involves Working with Children:
- (a) Upon appointment; and
 - (b) At least annually thereafter during the period of their tenure of Working with Children.
- 7.2. Training or education provides Adults with an understanding of:
- (a) Expected standards of behaviour for interactions with Children;
 - (b) Child-friendly ways for Children to participate, communicate and raise concerns;

- (c) Recognising possible physical and behavioural signs of Child Abuse (refer to [Appendix C](#));
 - (d) Catering for Children who have special needs (if applicable);
 - (e) Identifying and managing risks to the safety of Children; and
 - (f) How to make a Child safety Complaint and to whom.
- 7.3. The Management Committee provides a reminder to the Ecclesia annually about this *Policy* and the importance of safeguarding Children.
- 7.4. The Management Committee provides Members and Non-Members who Work with Children within the Ecclesial Environment with opportunities to develop skills in safeguarding Children and responding to Disclosures.

NP 8: PHYSICAL AND ONLINE ENVIRONMENTS MINIMISE THE OPPORTUNITY FOR ABUSE TO OCCUR

- 8.1. The Ecclesia implements a risk management framework (refer to [Appendix J](#)), which includes identifying and removing or mitigating safety risks to Children involved in Ecclesial Activities and reflects a Child Safe situational prevention approach (see guidance provided at [Appendix H](#)).
- 8.2. Risk assessments are developed for Ecclesial Activities that involve Working with Children and are approved by the Management Committee or Activity Coordinator/Risk Owner prior to the Activity. Risk assessments are implemented.
- 8.3. When developing Activity risk assessments, the following are considered:
- (a) Engaging with Children and their Parents about Child safety practices;
 - (b) The diverse needs of Children, such as Aboriginal and Torres Strait Islander persons, persons with disability, and persons from culturally and linguistically diverse backgrounds;
 - (c) Encouraging friendships and support from peers to help Children feel safe and less isolated; and
 - (d) If relevant to the Activity, controls or requirements relating to access to/use of the online environment (eg internet, social media) by Children.
- 8.4. The Ecclesia implements the following to support the safety of Children within the Ecclesial Environment:
- (a) Adults who Work with Children must meet the Child safety requirements outlined at National Principle 5;
 - (b) At all Ecclesial Activities for Children:
 - i. At least two Adults must be present; or
 - ii. The Activity must be conducted in Public View; or
 - iii. A Parent of the Child must be present;
 - iv. Any one-to-one discussion with a Child (eg pre-baptismal instruction; an interview with a Youth) must be conducted:
 - In the presence of at least two Adults (where the Child is female, at least one Adult must be female); or
 - In Public View; or
 - In the presence of at least one Parent of the Child.
- Note:** Where the above is impractical, other safeguards are to be adopted such as:
- An adult interacting with a Child alone should keep a file note of the interaction and, where possible, let the Safeguarding Representative or a Management Committee member and the Child's Parent/s know this interaction is going to occur (or promptly after the interaction);
 - Obtain prior written permission from the Parent/s of the Child.
- 8.5. Children must not have uncontrolled access to the online environment through a system provided by

the Ecclesia (as relevant to the Ecclesial Activity or the circumstances surrounding the Activity).

- 8.6. A Member must inform the Management Committee if they become aware that a person attending an Ecclesial Activity is the subject of a Child-related Complaint or has been convicted of Sexual Offending or any form of Abuse involving a Child.

NP 9: IMPLEMENTATION OF THE CHILD SAFE STANDARDS IS CONTINUOUSLY REVIEWED AND IMPROVED

- 9.1. The Management Committee reviews Child safety at formal Committee meetings.
- 9.2. The Management Committee reviews this *Policy* to ensure it remains compliant with the Law and relevant to the needs of the Ecclesia and Children participating in Ecclesial Activities. The *Policy* is reviewed:
- (a) Annually; and
 - (b) After every Complaint of Child Abuse
- 9.3. After a Complaint of Child Abuse or Breach of this *Policy*, the Management Committee takes actions to prevent recurrence. Actions may include:
- (a) Seeking advice from the Appropriate Authorities or Adults with relevant professional expertise on Child Abuse and Child safety;
 - (b) Reviewing this *Policy*, the Code of Conduct or Child safe procedures;
 - (c) Reviewing risk assessments;
 - (d) Providing closer supervision at Ecclesial Activities;
 - (e) Further Training or education;
 - (f) Placing restrictions on a person's contact with Children at Ecclesial Activities;
 - (g) Advising the Appropriate Authorities regarding a person's suitability to Work with Children; and/or
 - (h) Disciplinary or other action deemed appropriate by the Management Committee.

NP 10: POLICIES AND PROCEDURES DOCUMENT HOW THE ORGANISATION IS CHILD SAFE

- 10.1. The Ecclesia may implement additional procedures to further support the safety of Children at Ecclesial Activities provided they are consistent with this *Policy* and the Law.
- 10.2. The Ecclesia makes its *Safeguarding Children Policy* publicly available.
- 10.3. The Management Committee maintains Records of risk assessments for a minimum of 10 years as per the Ecclesia's Risk Management Policy and Procedures.

Appendix C: Identifying the Forms and Possible Signs of Child Abuse

C.1. Child Abuse includes:

(a) Any act committed against a Child involving:

- A sexual offence; or
- Grooming.

(b) The infliction, on a Child, of

- Physical violence; or
- Serious emotional or psychological harm.

(c) Serious neglect of a Child

(d) Exposure to family violence.

C.2. People in contact with Children, and their families should be aware of the possible signs of Child Abuse.

C.3. Sexual Offenders exploit the dependency, vulnerability and immaturity of Children. They may use a range of tactics including force, threats and tricks to engage Children in sexual contact and to try to silence them. They may also try to gain the trust and friendship of Parents to obtain access to Children. They may be family members or close family friends.

C.4. There are two different signs of Abuse:

(a) **Physical Signs** are the injuries/visible harm that may occur because of Abuse.

(b) **Behavioural Signs** are the actions, attitudes and emotions of an individual that indicate Abuse may have occurred.

C.5. A person should not assess individual signs in isolation; rather signs should be looked at in the context of other potential signs and the personal circumstances or history of the Child.

C.6. The signs of Abuse noted below are not exhaustive. The presence of these signs does not necessarily mean that Abuse has been, or is, occurring.

C.7. **Physical Abuse**

Physical Abuse refers to the intentional or reckless use of physical force that results in, or has the likelihood of resulting in, harm to a Child's health, survival, development and/or dignity. It may also include the threat of Abuse where the Child reasonably fears it may occur.

Unacceptable behaviour includes:

- Hitting, punching, kicking or slapping
- Choking or suffocating
- Throwing items or using items to hurt a Child
- Dragging or pushing
- Threatening to hurt a Child through words or gestures
- Inappropriate restraining or locking a Child up
- Using hostile force towards a Child
- Engaging in rough physical games

Table 5: Possible Signs of Physical Abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Bruising • Fractured bones • Burns or scalds • Lacerations or welts • Sprains or dislocations 	<ul style="list-style-type: none"> • Covering up injuries • Fear of Adults • Unable or unwilling to explain an injury • Being aggressive towards others • Avoiding physical contact

C.8. Sexual Abuse

Sexual Abuse refers to any act that exposes a Child to, or involves a Child in, sexual processes that the Child does not fully comprehend, is unable to give informed consent to and/or is not developmentally prepared for. It also includes acts that are contrary to acceptable community standards.

Unacceptable behaviours include:

- Sexual touching of a Child
- Sexual contact with a Child
- Possessing, creating or sharing Child Abuse material
- Sharing explicit photos of a Child
- Exposing a Child to pornography or other indecent material
- Using a camera to record a Child while they are dressing or bathing
- Using sexual language or gestures in the presence of Children
- Sexual comments, conversations or communications with a Child
- Comments that express a desire to act in a sexual manner with a Child

Table 6: Possible Signs of Sexual Abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Pain or bleeding in the anal or genital areas• Bruises and/or bite marks to breasts, buttocks, lower abdomen• Difficulty walking or sitting• Unexplained pain in genital area• Bed-wetting beyond usual age	<ul style="list-style-type: none">• Children describing sexual acts• Sexual behaviour beyond healthy development• Self-destructive behaviour• Withdrawn behaviour• Regression in development

C.9. Child Grooming

Child grooming is a form of sexual Abuse. It refers to actions deliberately undertaken with the aim of befriending and establishing a personal connection with a Child, to prepare the Child for sexual Abuse.

Table 7: Possible Grooming Strategies

Possible Grooming Strategies
<ul style="list-style-type: none">• Offering a Child gifts, money, attention or affection with the intention of making it easier to access the Child for sexual activity• Spending inappropriate one-to-one time with a Child• Actively isolating Children from other Adults or Children• Violating personal boundaries in the context of intimate care. This includes bathing, toileting and changing clothes.• Insisting on physical affection with a Child such as hugging, kissing or tickling even when a Child does not appear to want it• Sharing details with a Child of personal sexual experiences• Communicating privately with a Child via social media.• Making close physical contact, like inappropriate tickling or 'play' wrestling• Forming relationships with Parents and other family members of Children to build trust and ease their ability to access the Child.

C.10. Emotional/Psychological Abuse

Emotional or Psychological Abuse refers to inappropriate verbal or symbolic acts towards a Child. It can also refer to a pattern of failure over time to provide a Child with adequate non-physical nurturing and emotional support. It is behaviour towards a Child that is likely to damage their self-esteem or social competence.

Unacceptable behaviour includes:

- Teasing, demeaning or bullying
- Frequent yelling
- Persistent criticism
- Refusing to acknowledge a Child's worth and the legitimacy of their needs
- Persistent rejection of, or hostility towards, a Child
- Deliberately preventing a Child from forming friendships
- Encouraging a Child to engage in destructive or antisocial behaviour
- Making a Child feel worthless, unloved, alone or frightened
- Exposing a Child to family violence

Table 8: Possible Signs of Emotional/Psychological Abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Physical development is delayed• Delayed speech• Bed-wetting beyond usual age• Extreme weight loss• Signs of self-harm	<ul style="list-style-type: none">• Overly compliant behaviour• High levels of anxiety or depression• Avoids interaction with other Children• Demonstrating low self-esteem• Lack of trust in people• Extreme attention seeking• Eating disorders

C.11. Neglect

Neglect refers to when an Adult responsible for the care of a Child fails to provide them with the conditions that are culturally accepted as being essential for their growth, development and wellbeing. Neglectful behaviours can be an act of omission or undertaken by willful choice.

Unacceptable behaviour includes:

- Depriving a Child of necessities such as food, drink, clothing, medical care/treatment, or shelter
- Failing to protect a Child from Abuse such as failure to Report Abuse when a Child makes a Disclosure
- Exposing a Child to a harmful environment
- Failing to adequately supervise a Child, resulting in injury or harm.

Table 9: Possible Signs of Neglect

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Low weight for age• Poor standards of hygiene• Untreated physical problems• Poor complexion	<ul style="list-style-type: none">• Stealing food• Indiscriminately seeks out Adult affection• Being constantly tired• Frequently late or absent• Being withdrawn

C.12. Exposure to Family Violence

Refers to any form of abusive behaviour by a person towards another family member. The Abuse can be physical, sexual, emotional, psychological, economical, threatening or coercive type behaviour. It is also a form of Abuse when a Child is exposed to, hears or witnesses any of the effects of the abusive behaviour.

Examples include:

- Experiencing fear for self, another person, a pet or belongings
- Seeing, hearing or sensing violence against another family member
- Attempting to prevent or minimise the violence
- Being blamed for not preventing the violence

Table 10: Possible Signs of Exposure to Family Violence

Physical signs	Behavioural signs
<ul style="list-style-type: none">• Speech disorders• Delays in physical development• Physical symptoms such as headaches or stomach aches• Being easily startled• Injuries as a result of harm	<ul style="list-style-type: none">• Delays in emotional development• Fear of, and avoiding, going home• Depression, anxiety or suicidal thoughts• Violent or aggressive behaviour and language• Demonstrated fear of Parents

Appendix D: Ecclesial Code of Conduct

As brothers and sisters of Jesus Christ, all Members and, where applicable, Non-Members are to:

- D.1. strive to follow *The Commandments of Christ*, as set out in the Bible Reader's Companion produced by the Office of The Christadelphian, Birmingham, UK
- D.2. promote the safety and wellbeing of Children (including Young People) at Ecclesial Activities by:
 - (a) complying with the *Ecclesia's Safeguarding Children Policy*, including this Code of Conduct
 - (b) identifying and removing or mitigating safety risks to Children
 - (c) providing a Christ-like example and acting in their best interests, including physically, spiritually and emotionally
 - (d) maintaining appropriate speech and behaviour when interacting with them
 - (e) ensuring another Adult or their Parent is present, or you are Publicly Visible when with a Child (eg when conducting one-to-one teaching, instruction or any other Ecclesial Activities)
 - (f) not doing things of a personal nature (such as toileting or changing clothes) that they can do for themselves
 - (g) only using physical contact appropriate to the Activity or if necessary (eg if it is needed for the Child's safety)
 - (h) obtaining consent from the Child's Parent/s before taking a photograph or video of a Child, and ensuring the Parent is aware of how authorised photographs or videos will be used (eg seeking Parent consent prior to posting a photograph or video on the online environment)
 - (i) listening and responding promptly and appropriately to any concern or Complaint about safety raised by a Child
 - (j) Reporting where there is Reasonable Belief that a Child has been, is being, or is at risk of being, Abused, in accordance with the Ecclesia's Child Safety Complaints Handling Procedure (refer to [Appendix F](#))
- D.3. never:
 - (a) use abusive, derogatory, offensive or violent language
 - (b) develop a sexual or other inappropriate relationship with a Child
 - (c) inappropriately touch a Child (eg in areas of a sexual nature)
 - (d) provide a Child with alcohol, illicit drugs, tobacco (or any other nicotine-containing product) or pornography
 - (e) allow bullying or other inappropriate behaviour to take place between Children
 - (f) give inappropriate gifts or other items to a Child. Check with a Parent for any dietary needs/issues before offering sweets to a Child (such as during Sunday School)
 - (g) manipulate, Abuse, coerce or encourage a Child to engage in any inappropriate activity
 - (h) have discussions about inappropriate Adult themes in the presence of Children
 - (i) communicate inappropriately with a Child via any means
 - (j) exploit, groom or harass a Child
 - (k) travel alone with a Child except in the event of an emergency or with the prior consent of the Child's Parent/s
 - (l) use photographic or video devices in toilets or changing areas
 - (m) share intimate information about a Child, or share personal information about a Child without the prior consent of the Child's Parent/s
 - (n) be accommodated in the same room as a Child during an Ecclesial Activity (unless it is the Child's Parent/s)
 - (o) leave Children unsupervised with unknown or unauthorised persons
 - (p) possess, create or share Child Abuse material
 - (q) fail to Report information to NSW Police or other Appropriate Authorities if you know a Child is being or has been Abused.
- D.4. The Management Committee will promptly respond to a Breach of the Code of Conduct and will manage the process in a fair, objective and supportive manner. Depending on the nature/circumstances of the Breach, action may include:
 - (a) emphasis on the relevant aspect of the Code that was Breached
 - (b) providing closer supervision

- (c) providing Training or education
- (d) mediation between the parties involved in the incident (where appropriate)
- (e) removing a person from rostered duties or attendance at Ecclesial Activities
- (f) other measures as deemed appropriate by the Management Committee
- (g) review of the current *Policy* (including the Code) and/or procedures, with updates if necessary.

D.5. All Members (and, where applicable, Non-Members) involved in an Ecclesial Activity are to raise concerns about a Child's safety. If you have a concern or are aware of a Breach of the Code of Conduct, please report it promptly to the Safeguarding Representative or a member of the Management Committee, ensuring that no actual or perceived conflict of interest exists.

Appendix E: Child Safe Engagement, Induction and Training Procedure

The Ecclesia conducts engagement/screening, induction and training for Adults who Work with Children within the Ecclesial Environment as detailed in Table 11. This reflects the Ecclesia's Human Resource procedure.

Table 11: Child Safe Engagement, Induction and Training Procedure

Stage	Description
1	<p>Engagement/screening involves the following:</p> <ul style="list-style-type: none">• Discussing the role and key duties/responsibilities with the candidate, including the Ecclesia's commitment to safeguarding Children• Assessing the candidate's skills and experience to perform the role, including Working with Children• The candidate must have a current WWCC clearance prior to commencing the role• Ensuring the candidate has read and commits to the Ecclesia's <i>Safeguarding Children Policy</i>, including the Code of Conduct• Ensuring the candidate's approach to Working with Children aligns with the Ecclesia's Child safety commitment• Ascertaining whether:<ul style="list-style-type: none">○ The candidate has ever been investigated for a Complaint involving a Child (and, if so, what were the circumstances)○ The candidate has ever been convicted or investigated for sexual abuse, assault or a sexual offence of any kind○ There is any other information relating to the candidate performing the role that the Ecclesia should be aware of• Verification by the Ecclesia of the candidate's WWCC clearance prior to commencing the role• Recording the candidate's cleared WWCC number, the date of verification, its expiry date and renewal date in the Ecclesia's WWCC register
2	<p>Induction involves the following:</p> <ul style="list-style-type: none">• Completing Child safe Training or education
3	<p>Training involves the following:</p> <ul style="list-style-type: none">• Completing annual Child safe Training or education during the period of their tenure of Working with Children• Developing/using relevant checklists• Responding to/addressing Parent, Children and peer feedback received

Appendix F: Child Safety Complaints Handling Procedure

This Appendix incorporates the Ecclesia's Child Safe Reporting Procedures.

Step 1: Identifying a Child Safety Complaint

(a) A Complaint may involve the following:

- An **Allegation** that has been made against a person concerning their behaviour towards a Child
- A **Concern** that has been raised about a Child's safety or wellbeing
- A **Reasonable Suspicion** that Abuse may be occurring, or that a Child may be at risk of Abuse
- A **Disclosure** of Abuse made by either a Child or other Adult (including about historical Child Abuse)
- A **Breach** of the *Safeguarding Children Policy* or the Code of Conduct

(b) Complaints relating to Children may involve:

- Sexual Abuse
- Physical Abuse
- Emotional/Psychological Abuse
- Neglect
- Exposure to family violence

Step 2: Receiving a Complaint

When receiving a Complaint, the following process should be followed:

(a) Listen

When a Child is making a Disclosure:

- Allow the Child to use their own words
- Consider whether the Child's Parent should be present
- Remain calm, patient, listen and be supportive
- Do not ask suggestive or leading questions
- Do not interrogate the Child. Avoid asking too many questions that may overwhelm them

(b) Reassure

Reassure the Child that:

- They have done the right thing by voicing their concern
- What has happened is not their fault
- You believe them and are taking their concern seriously

(c) Respect

- Respect that it may take the Child time to disclose information
- Explain what the next steps will be (using language appropriate to the Child's age and capability)
- Avoid making promises you cannot keep; for example that you will not tell anyone about what has happened
- Ask the Child what kind of support they would like from you or the Ecclesia

Note: *If a person initiates a Child safety Complaint on behalf of a Child and the affected Child is not present, you should adopt the same process outlined above.*

Step 3: Reporting a Child Safety Complaint

(a) If any person believes, on Reasonable Grounds, a Child is at immediate risk of Abuse or Harm, or the

Complaint involves a serious criminal offence, contact the NSW Police as soon as practicable on **000** (request an Ambulance if necessary).

- (b) If any person believes, on Reasonable Grounds, that a Child is at risk of significant Harm, contact the Child Protection Helpline as soon as practicable on **13 21 11**.
- (c) For all non-emergency related matters, contact the Police on **131 444**.

Note: Further guidance on Reporting Child Abuse or Harm is outlined in [Appendix I](#).

- (d) Request direction from the Appropriate Authority contacted regarding the Child's immediate welfare.
- (c) Report all Child safety Complaints to the Safeguarding Representative or another member of the Management Committee who has no actual or perceived conflict of interest.

Note: In the case of an emergency or the risk of significant Harm, NSW Police or the Child Protection Helpline should be contacted first, after which the Safeguarding Representative or another Management Committee member should be contacted.

- (d) Take prompt action to ensure the safety and wellbeing of the Child.

Note: To effectively identify Child safety Complaints, you should be aware of the different forms of Child Abuse as well as the possible physical and behavioural signs (see [Appendix C](#)).

A member of the Management Committee must not be involved in any matter related to a Complaint or Disclosure where there may be an actual or perceived conflict of interest.

The aim of advising the Management Committee is to enable them to implement risk management measures to ensure the safety and wellbeing of the Child or other Children. This may involve appropriately restricting a person against whom an allegation has been made.

Actions taken by the Management Committee and subsequent communication must not compromise confidentiality. NSW Police or other Appropriate Authorities may wish to speak to a Child before other interviews occur. The Child should not be questioned further about the Disclosure until authorities, such as the Police, have been provided the opportunity to speak with the Child and have confirmed that further inquiries by the Ecclesia can be made.

- (e) A decision by the Management Committee not to Report a Complaint or Disclosure to the Appropriate Authorities does not prevent any other person from Reporting it to the Appropriate Authorities. Individuals may still have a legal obligation to make a Report in accordance with [Appendix I](#).

Support and Protection for Reporters

- (a) Unless inappropriate under the circumstances, the Management Committee will inform Parents of progress and actions relating to a Complaint process and discuss matters with Parents in accordance with the Law.
- (b) The Management Committee will provide or help facilitate support to a Child or other person who makes a Complaint or Disclosure.

Note: Support may include, without compromising the confidentiality and conflict of interest requirements of this section, assistance with the Reporting process and/or with obtaining professional support.

- (c) The Ecclesia will not penalise anyone who makes a Complaint in the best interests of the Child. Individuals are entitled to protections outlined in NSW Legislation (as per [Appendix I](#)).

Reportable Conduct

- (a) If the Management Committee is informed of a Complaint or Disclosure that may be Reportable Conduct as per [Appendix I](#) and has not yet been Reported to the Appropriate Authorities, they must determine if the circumstances constitute Reportable Conduct within the meaning of applicable NSW Legislation.
- (b) If the Management Committee determines that an individual has engaged in Reportable Conduct, the Complaint or Disclosure must be Reported as soon as practicable to the Appropriate Authorities.
- (c) If the Management Committee determines the conduct is not Reportable Conduct within the meaning of the applicable Legislation and that they are not required to Report it to the Appropriate Authorities, the decision and the reasons for the decision must be documented.

Step 4: Investigation

- (a) Members are to fully cooperate with an Appropriate Authority exercising a lawful power, such as the NSW Police.
- (b) If a Report has been made to an Appropriate Authority, the Management Committee should communicate with the Authority prior to initiating any internal investigation.
- (c) Where an internal investigation is required (refer to [Appendix I](#)), the Management Committee should engage an independent investigator to ensure the objectivity and integrity of the investigation. The Management Committee should not conduct the investigation themselves.

Note: *The Appropriate Authorities have professional personnel specialised in investigating Child Abuse and minimising the possible detrimental effect detailed questioning may have on an alleged victim. For the same reason, a qualified independent investigator is recommended where an internal investigation is required.*

Step 5: Recording Complaints

All Child safety Complaints must be Recorded using the Child Safety Incident Report Form (refer to [Appendix G](#)) regardless of whether the Complaint meets the statutory Reporting threshold. The completed form must be provided to:

- (a) The Safeguarding Representative or Management Committee
- (b) The Appropriate Authorities (such as the NSW Police), if requested, and
- (c) The Ecclesia's insurer.

Step 6: Risk Assessments

When the Management Committee becomes aware of a Complaint or Disclosure, they must conduct a risk assessment to identify, assess and remove or minimise risks to the Child and any Secondary Victims/other Children.

Note: *This risk assessment should be conducted in a manner that does not interfere with any investigation by Appropriate Authorities. It is an assessment of risk, not an investigation of the Complaint or Disclosure. After the type of allegation and level of risk is determined, the Management Committee will consider what actions are necessary to safeguard Children. Some examples include, but are not limited to:*

- *Removal of the individual from Working with Children*
- *Increased supervision, including of the individual*
- *Removal and/or suspension/restriction of the individual from the Ecclesia's premises and/or Activities*
- *Provision of ongoing monitoring of, and support for, the affected Child*
- *Training or education of Members or Non-Members (as appropriate).*

Step 7: Disciplinary Action

Where the subject of a Complaint involves a Member or person associated with the Ecclesia, the following actions may be taken to maintain a Child safe environment (as determined by the Management Committee):

- (a) Increased supervision
- (b) Removal or suspension from attendance at Child-related activities
- (c) Removal or suspension from rostered duties
- (d) Removal of Ecclesial membership
- (e) Other action as deemed appropriate by the Management Committee

Step 8: Debrief

At the conclusion of the Complaints process, the Safeguarding Representative or Management Committee should debrief affected parties on the outcome and reasons for any decisions. All information shared in debriefs must comply with confidentiality requirements of this *Policy*.

- (a) The affected Child and their Parent/s:
 - Follow up with the Child and/or their Parent/s and inform them of the outcome and resolution.

- If appropriate, connect the Child and/or their family with support services.
- Document all communications.

(b) The subject of the Complaint:

- Debrief with the subject of the Complaint and inform them of the outcomes and resolution.
- Provide referrals to external agencies for additional or ongoing support such as counselling services if required/appropriate.
- Document all communications.

(c) Members and Non-Members

- Debrief with affected Members and Non-Members and offer or suggest counselling services, if required/appropriate.
- Debrief all relevant Members and Non-Members and provide pertinent information, if appropriate.
- Document all communications.

(d) Appropriate Authorities:

- The Safeguarding Representative or Management Committee may also need to communicate with Appropriate Authorities, such as the NSW Police.

Additional Considerations

F.1. Confidentiality

A Complaint or Disclosure must remain strictly confidential to the extent permitted by Law. The circumstances, the identities of the Child, the person making the Complaint and the subject of the Complaint must remain confidential other than is necessary to ensure the safety and wellbeing of the Child or other Children, and for:

- (a) Communicating with the Appropriate Authorities;
- (b) Communicating with persons approved by the Appropriate Authorities (such as the Child's Parent/s); and
- (c) Advising the Management Committee.

F.2. Disclosures

- (a) The Management Committee should inform the Ecclesia's insurer of any Complaint or Disclosure Reported to the Appropriate Authorities.
- (b) A person who attends an Ecclesial Activity and who is the subject of a Complaint, whether related to Activities of the Ecclesia or not, must:
 - Promptly inform the Management Committee;
 - Cooperate with the Appropriate Authorities in their investigation of the Complaint;
 - Comply with the Management Committee's directions regarding their participation in Ecclesial Activities and interactions with Children; and
 - Keep the Management Committee informed of the status of the investigation into the Complaint and its resolution.

F.3. Further Information, Advice and Support Services

If further information or advice is needed in relation to Reporting requirements and responsibilities, contact the Reportable Conduct Enquiries Line on 8219 3800, email reportableconduct@ocg.nsw.gov.au or access the NSW Office of the Children's Guardian's free eLearning about responding to Reportable Allegations.

Information about support services available, including contact details, appears in [Appendix I](#), Table 14.

Appendix G: Child Safety Incident Report Form

This form should be completed for all Child safety Complaints. Before completing this form, please ensure that relevant requirements in the *Safeguarding Children Policy* have been followed and advice has been sought from the Appropriate Authorities, where applicable.

This Record and any notes must be kept confidential and stored in accordance with Record keeping requirements in the *Policy*. The Ecclesia must provide any Records to the Appropriate Authorities should they require them.

Child Safety Incident Report Form	
Complainant's details	Name: Phone: Email Address:
Classification of complainant <i>(eg a Member, Non-Member, Activity Coordinator, Youth Worker, Sunday School Superintendent, Child, member of the public, relative etc)</i>	
Date Complaint received:	
Child's details	Name: Age: Address:
Does the Child identify as a Child from Aboriginal and Torres Strait Islander or First Nations' background?	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Unknown
Does the Child have a disability?	<input type="checkbox"/> No <input type="checkbox"/> Yes, please provide relevant details
Does the Child come from a culturally or linguistically diverse background?	<input type="checkbox"/> No <input type="checkbox"/> Yes, please specify
Does the Child require communication support? <i>(Communication support may include an interpreter, a support person, a family member etc)</i>	<input type="checkbox"/> No <input type="checkbox"/> Yes If yes, please provide any information relating to the Child's preferred communication method, support needs and involvement in the Complaints process:

Child Safety Incident Report Form	
Nature of the alleged incident	<input type="checkbox"/> Serious emotional or psychological Abuse <input type="checkbox"/> Serious neglect <input type="checkbox"/> Sexual Abuse <input type="checkbox"/> Grooming <input type="checkbox"/> Physical violence/Abuse <input type="checkbox"/> Exposure to family violence <input type="checkbox"/> Breach of the <i>Safeguarding Children Policy/Code of Conduct</i> <input type="checkbox"/> Other inappropriate behaviour Please provide details:
Name of person complained about (respondent)	
Classification of respondent <i>(eg a Member, Non-Member, Activity Coordinator, Youth Worker, Sunday School Superintendent, member of the public, relative, another Child etc)</i>	
Date of alleged incident	
Time of alleged incident	
Location of alleged incident	
Witnesses (if any) <i>(if there are more than 3 witnesses, please attach additional details to this form)</i>	Name (1): Contact details: Name (2): Contact details: Name (3): Contact details:
Details of Complaint and reason/s for suspecting Abuse <i>Please provide as much detail here, including:</i> <ul style="list-style-type: none"> <i>what was said, (where possible, noting the exact words used by the person making the Complaint or allegation)</i> 	

Child Safety Incident Report Form	
<ul style="list-style-type: none"> what you observed (eg injury, Harm, Disclosure) and any other details relevant to the incident 	
Interim immediate action taken (if any) to: <ul style="list-style-type: none"> ensure the Child's safety and/or support their needs or welfare support the welfare of the person complained about 	
Provide details of any Harm or injuries to the Child, and whether the Child or others require or received medical attention	
NSW Police contacted <i>Complete if relevant</i>	Who: <i>name of Police officer contacted</i> When: <i>date and time you contacted the Police</i> Advice they provided: Case reference number (if known):
Child Protection Authority contacted <i>Complete if relevant</i>	Who: <i>name of contact person</i> When: <i>date and time you made contact</i> Advice they provided: Case reference number (if known):
Relevant NSW department contacted <i>Complete if relevant</i>	Who: <i>name of contact person</i> When: <i>date and time you made contact</i> Advice they provided: Case reference number (if known):

Child Safety Incident Report Form	
Safeguarding Representative or member of the Management Committee informed	Who: <i>name of person you reported this to</i> When: <i>when did you contact them</i>
Completed by	Name: Signature: Date:
Signed by <i>(complainant, if it is not a Child)</i>	Complainant's name <i>(if it is not a Child)</i>

Appendix H: Child Safe Situational Prevention Strategies

Table 12: Child Safe Situational Prevention Strategies

Increase the Effort	Increase the Risks	Remove Excuses
<p>Deflect Offenders</p> <ul style="list-style-type: none"> • Publish on the website: <ul style="list-style-type: none"> ◦ The Ecclesia's commitment to Child safety ◦ The Ecclesia's Child safe policy • Ensure Ecclesial engagement opportunities: <ul style="list-style-type: none"> ◦ Promote the Ecclesia's commitment to Child safety ◦ Include a requirement for WWCC clearance 	<p>Extend Guardianship</p> <ul style="list-style-type: none"> • Encourage and support the inclusion of Parents and Children in Ecclesial Activities and decision making • Encourage and support Children to speak up if they do not feel safe • Create a Child safe culture 	<p>Set Rules</p> <ul style="list-style-type: none"> • Implement the Ecclesia's Child safe policy, code of conduct and other Child safe practices • Role descriptions for Child-Related Work outline the duties and responsibilities of Members and Non-Members • Provide regular feedback opportunities
<p>Screen Candidates</p> <ul style="list-style-type: none"> • Verify WWCCs • Identify any prior instances of inappropriate behaviour with Children • Interview process to understand the candidate's Child safety values and commitment 	<p>Assist Natural Surveillance</p> <ul style="list-style-type: none"> • Design open plan spaces where Children interact with Adults to allow for natural surveillance and line-of-sight supervision or observation • Ask Children to identify areas where they do not feel safe • Ensure windows are not obscured with posters or frosted glass • Ensure Children are not in isolated areas unless accompanied by more than one Adult 	<p>Display Instructions</p> <ul style="list-style-type: none"> • Make Child safe policy and code of conduct accessible • Develop age-appropriate posters to inform Children how to stay safe • Develop and display posters: <ul style="list-style-type: none"> ◦ Indicating the Ecclesia's commitment to Child safety ◦ Informing Members and Non-Members of how to make a Complaint ◦ Providing contact details for support services available
<p>Modify Physical Environment</p> <ul style="list-style-type: none"> • Prevent access to concealed and secluded areas • Implement rules to make concealed areas out of bounds • Use clear glass in doors and windows to assist natural surveillance or observation • Install surveillance equipment in very high-risk environments 	<p>Reduce Anonymity</p> <ul style="list-style-type: none"> • Ensure all Members and Non-Members who Work with Children are identifiable to Parents • Provide feedback mechanisms on all aspects of the Ecclesia, including safety risks, the environment and the culture 	<p>Governance and Leadership</p> <ul style="list-style-type: none"> • Policy outlines consequences of Breaching the policy or code of conduct • Provide ongoing support and guidance about Child safe practices • Provide support for people who make Complaints or allegations

Appendix I: Child Safety Requirements and Procedures Specific to NSW

- (a) These procedures provide supporting information about:
- Screening requirements for Adults who will Work with Children;
 - Who is defined as a Child;
 - Who must Report Child Abuse;
 - Who can Report Child Abuse;
 - Child protection and related Legislation;
 - Appropriate Authorities; and
 - Where to access information and support services for Children and their families.⁹
- (b) These Child Safety Requirements and Procedures do not remove any obligations of the Ecclesia to operate in accordance with its *Safeguarding Children Policy*.

1. Regulation of the Child Safe Standards

- 1.1. Under the *Children's Guardian Act 2019 (NSW)*, religious organisations are required to implement the Child Safe Standards. Compliance with the Standards is monitored by the NSW Office of the Children's Guardian (OCG).
- 1.2. The head of a Child safe organisation must ensure the organisation implements the Child Safe Standards through systems, policies and processes which may include, but are not limited to, the following:
- (a) Statement of Commitment to Child Safety
 - (b) A Child safe policy
 - (c) A code of conduct
 - (d) A Complaint management procedure
 - (e) A human resources procedure
 - (f) A risk management plan
 - (g) Delivery of Child safe Training to Employees and Volunteers.
- 1.3. The head of a Child safe organisation must also ensure the organisation implements a Reportable Conduct policy or procedure (if the organisation is a relevant entity). This requirement is applicable to Ecclesias in NSW.
- 1.4. Ecclesias should refer to the [NSW Office of the Children's Guardian Guide for Implementing the Child Safe Standards](#) for guidance on how to comply with the Child Safe Standards.

2. Recruitment obligations

- 2.1. New South Wales has a Working with Children Check (WWCC) system under the *Child Protection (Working with Children) Act 2012 (NSW)*.
- 2.2. Adults engaged in Child-Related Work (paid and unpaid) with religious organisations must hold a WWCC. Child-Related Work for a religious organisation includes work carried out
- (a) as a minister, priest, rabbi, mufti or other like religious leader or spiritual officer of the organisation, or
 - (b) in any other role in the organisation involving activities primarily related to Children, including Youth groups, Youth camps, teaching Children and Childcare.
- 2.3. The Ecclesia is required to ensure that:
- (a) People in roles that engage in Child-Related Work hold a valid WWCC;
 - (b) They verify and Record WWCCs; and
 - (c) There are sound practices in place for monitoring expiring WWCCs.

⁹ Information on resources is as published by the Australian Institute of Family Studies. Retrieved on 8 October 2023 from <https://aifs.gov.au/cfca/practice-guides>.

This aligns with the Ecclesia's *Safeguarding Children Policy* which requires implementation of a register to Record the WWCC clearance and verification information of Adults associated with the Ecclesia involved in Child-Related Work.

2.4. The Ecclesia must register with the OCG to verify the WWCC details of Adults associated with the Ecclesia involved in Child-Related Work. Refer to [Help to register and verify | Office of the Children's Guardian \(nsw.gov.au\)](https://www.help.to.register.and.verify.office.of.the.children.guardian.nsw.gov.au) for guidance on how to register the Ecclesia.

2.5. Verification must be completed through the OCG's online WWCC system.

3. Mandatory Reporting

Table 13 sets out Mandatory Reporting requirements in New South Wales.

Table 13: Mandatory Reporting Requirements in New South Wales

Key Legislation	<i>Children and Young Persons (Care and Protection) Act 1998</i> (NSW)
Who is a Child?	A person under the age of 16 years (for Mandatory Reporting purposes).
Child Protection Authority and Contact	<p>If a Child is in immediate danger, Report to the NSW Police as soon as practicable DIAL 000</p> <p>Department of Communities and Justice</p> <ul style="list-style-type: none">• Call the Child Protection Helpline on 13 21 11• Make an eReport through the Child Story Reporter Website Community
Mandatory Reporters	<ul style="list-style-type: none">• People in Religious Ministry or providing religious-based activities to Children and all registered psychologists are Mandatory Reporters• A person who, in the course of his or her professional work or other paid employment delivers health care, welfare, education, Children's services, residential services or Law enforcement, wholly or partly, to Children• A person who holds a management position in an organisation the duties of which include direct responsibility for, or direct supervision of, the provision of health care, welfare, education, Children's services, residential services, or Law enforcement, wholly or partly, to Children.
When Reporting is required	<p>A Mandatory Reporter is required to make a Report to the Department of Communities and Justice (DCJ) if the person:</p> <ul style="list-style-type: none">(a) has Reasonable Grounds to suspect that a Child is at risk of significant Harm, and(b) those grounds arise during the course of or from the person's work. <p>The person must, as soon as practicable, Report the name or a description of the Child and the grounds for suspecting that the Child is at Risk of Harm.</p>

When is a Child at risk of significant Harm?	<p>A Child or Young Person is at risk of significant Harm if current concerns exist for the safety, welfare or wellbeing of the Child or Young Person because of the presence, to a significant extent, of any one or more of the following circumstances:</p> <ul style="list-style-type: none"> (a) The Child or Young Person's basic physical or psychological needs are not being met or are at risk of not being met; (b) The Parents have not arranged and are unable or unwilling to arrange for the Child or Young Person to receive necessary medical care or an education; (c) The Child or Young Person has been, or is at risk of being, physically or sexually Abused or ill-treated; (d) the Child or Young Person is living in a household where there have been incidents of domestic violence and, as a consequence, the Child or Young Person is at risk of serious physical or psychological Harm; or (e) A Parent has behaved in such a way towards the Child or Young Person that the Child or Young Person has suffered or is at risk of suffering serious psychological Harm.
Protections for Reporters	<p>If a person makes a Report in good faith to the DCJ or other person with power or responsibility to protect a Child or Young Person, the making of the Report –</p> <ul style="list-style-type: none"> (a) does not constitute a breach of professional conduct or ethics (b) will not incur liability for defamation (c) does not constitute a ground for civil or criminal liability against the person making the Report. <p>The person cannot be compelled in any proceedings to produce evidence relating to the Report and the identity of the person will be protected.</p>

4. Voluntary Reporting

- 4.1. Under the *Children and Young Persons (Care and Protection) Act 1998* (NSW), a person who has Reasonable Grounds to suspect that a Child or Young Person is, or that a class of Children or Young Persons are, at risk of significant Harm, may make a Report to the DCJ.
- 4.2. Reasonable grounds is not defined in the Act. If a person is unsure whether they have Reasonable Grounds to make a Report, they should speak to the Safeguarding Representative or Management Committee, or seek guidance from the Child Protection Helpline (132 111).

5. Concealing Child Abuse Offence – *Crimes Act 1900* (NSW) s 316A

- 5.1. Under the *Crimes Act 1900* (NSW), any Adult who:
 - (a) Knows, believes or reasonably ought to know that a Child Abuse offence has been committed;
 - (b) Knows, believes or reasonably ought to know that he or she has information that might be of material assistance in securing the apprehension of the Offender or the prosecution or conviction of the Offender for that offence; and
 - (c) Fails, without reasonable excuse, to bring that information to the attention of a member of the NSW Police force as soon as it is practicable to do so,

is guilty of an offence punishable by up to 5 years of imprisonment.

6. Failure to Reduce or Remove Risk of Child Becoming a Victim of Child Abuse – *Crimes Act 1900* (NSW) s 43B

- 6.1. An Adult who carries out Work for a Child-related organisation (Employee, contractor, Volunteer or

other) commits an offence if —

- (a) They are aware of a serious risk that another Adult worker will commit a Child Abuse offence against a Child who is, or may come, under the care, supervision or authority of the organisation, and
- (b) by reason of the person's position, they have the power or responsibility to reduce or remove that risk, and
- (c) they negligently fail to reduce or remove that risk.

Maximum penalty - Imprisonment for 2 years.

7. Child Abuse – Liability of Organisations – *Civil Liability Act 2002 (NSW) Part 1B*

- 7.1. The duty to prevent applies to organisations that exercise care, supervision or authority over a Child (under 18 years). The duty applies to all Ecclesia in NSW.
 - (a) An organisation that exercises care, supervision or authority over a Child must take reasonable precautions to prevent an individual associated with the organisation from committing Child Abuse (sexual or physical Abuse) against a Child who is under the care of the organisation
 - (b) An individual is associated with an organisation if the individual is an office holder, officer, Employee, owner, Volunteer or contractor of the organisation. If the organisation is a religious organisation, it also includes a religious leader (such as a priest or a minister) or member of the personnel of the organisation.

8. Reportable Conduct

- 8.1. Under the NSW Reportable Conduct Scheme (the Scheme), heads of entities must Report to the OCG if they become aware of a Reportable Allegation or conviction in relation to an Employee of a relevant entity.
- 8.2. Religious bodies are captured by the Scheme if they are:
 - (a) a body established for a religious purpose, and
 - (b) an entity that establishes or directs, controls or administers an educational or other charitable entity that is intended to be, and is conducted in accordance with religious doctrines, beliefs or principles.
- 8.3. An Employee in a religious body is an individual who holds, or is required by the religious body to hold, a WWCC clearance for the purpose of engagement with the religious body.
- 8.4. *Reportable Allegation*, in relation to an Employee of a religious body, means an allegation that the Employee has engaged in conduct that may be Reportable Conduct, whether or not the conduct is alleged to have occurred in the course of the Employee's engagement with the religious body.
- 8.5. This is an 'allegations based' Scheme, which means the allegation triggers the obligation to notify the OCG. There does not need to be any evidence or proof that the conduct occurred if the allegation falls within one of the following categories of Reportable Conduct:
 - (a) a sexual offence;
 - (b) sexual misconduct;
 - (c) assault against a Child;
 - (d) ill-treatment of a Child;
 - (e) neglect of a Child;
 - (f) any behaviour that causes significant emotional or psychological Harm to a Child; or
 - (g) criminal offences such as the failure to reduce or remove risk of a Child becoming the victim of Abuse and concealing Child Abuse (*Crimes Act 1900 ss 43B and 316A*).
- 8.6. If a person becomes aware of a Reportable Allegation or a Reportable conviction in relation to an Employee of a relevant entity, the person must, as soon as practicable, report to the head of the relevant entity.
- 8.7. The head of the entity of a religious body must notify the OCG if:

- (a) they receive a report in relation to an Employee of the relevant entity
- (b) they otherwise become aware of a Reportable Allegation or Reportable conviction in relation to an Employee

- 8.8. The head of the entity has seven business days from being informed of a Reportable Allegation to notify the OCG. The notice must include certain information relating to the Reportable Allegation. Requirements are outlined in the *Children's Guardian Act 2019* at s 29.
- 8.9. The Scheme also places obligations on the head of entities to undertake an assessment and investigation into the Reportable Conduct as soon as practicable after receiving a report. The *Children's Guardian Act 2019* outlines the requirements at Division 5.
- 8.10. For Reportable Conduct advice and support, call (02) 8219 3800 or email reportableconduct@ocg.nsw.gov.au

9. Information Sharing under the *Children and Young Persons (Care and Protection) Act 1998 Chapter 16A*

- 9.1. Under Chapter 16A, certain organisations ('prescribed bodies') are allowed to exchange information about the safety, welfare or wellbeing of Children. Religious bodies may request exchange information with other prescribed bodies to assist either body to:
 - (a) Make any decision, assessment or plan, or to initiate or conduct any investigation, or to provide any service, relating to the safety, welfare or wellbeing of the Child or Young Person
 - (b) Manage any risk to the Child or Young Person
- 9.2. For further guidance, refer to the OCG - [Religious bodies and Ch16A information sharing | Office of the Children's Guardian \(nsw.gov.au\)](#)

10. Information and Support Services

Table contains information on support services available to Children and families in NSW.

Table 14: Information and support services available in NSW

For Children:	Kids Helpline: call 1800 55 1800 for free counselling and advice for Children, Young People and young adults between the ages of 5 and 25.
For Adults:	<ul style="list-style-type: none"> • Lifeline: call 13 11 14 for this free Australia-wide crisis support and suicide prevention service. • Parent Line: call 1300 1300 52 for free telephone counselling and support service for Parents with Children aged 0 to 18. • Christadelphian Support Network: call helpline on 08 8270 4115.

Appendix J: Punchbowl Christadelphian Ecclesia Inc. Risk Management Policy and Procedures

J.1. BACKGROUND AND PURPOSE

This outlines the framework in place to identify, assess and manage risks. Risk management:

- (a) contributes to the operations of the Ecclesia
- (b) forms a routine part of Ecclesial planning, decision-making and prioritising
- (c) involves a practical approach, including taking appropriate and timely risk mitigations
- (d) is dynamic and responsive to change.

The Ecclesia is committed to using risk management to improve planning and operations by:

- assessing proposed activities or projects to identify and remove or mitigate risks, taking into account relevant lessons learnt (eg from past activities)
- reviewing the Ecclesia's risk management policy and framework from time to time.

J.2. POLICY STATEMENT

There is inherent risk in all Ecclesial Activities. A systematic approach will be taken to minimise adverse impacts on the Ecclesia and its attendees, including Children.

The objectives of the Ecclesia's risk management approach are to:

- support the Ecclesia's Constitution and compliance with statutory and regulatory obligations
- implement a practical framework for managing risk
- support and encourage identification, reporting and management of risks
- minimise adverse unforeseen events
- respond appropriately to adverse impacts of events
- provide a guide for identifying and reporting risk
- prevent, identify and remove or mitigate risks to Ecclesial attendees, including Children.

J.3 PROCEDURES – RISK MANAGEMENT FRAMEWORK

In implementing this policy, the following risk management framework will operate.

1. Establish the Context - Risk Types

There are different risk management requirements depending on the following risk types:

Corporate	Operational	Project	Longer-term (beyond 5 years)
Risks that have Ecclesial-wide impacts (eg policy, strategy, legal compliance, organisational change)	Risks that arise directly from Ecclesial operations, such as management of assets, facilities, activities and systems (including safety risks)	Risks that arise from managing a discrete project with a start and finish date (eg an Ecclesial building or maintenance project, an IT upgrade project)	Risks that are longer term (eg are unlikely to occur in the next 5 years, but may occur in 5 to 10 years' time)

2. Risk Identification

Risks within each of the above risk types that could materially impact the Ecclesia should be identified to determine if action is required. Material impacts are those that, if left uncontrolled:

- for corporate risks, could have a strategic impact which disrupts the short-term viability or reputation of the Ecclesia
- for operational risks, could adversely impact Ecclesial attendees, including Children, assets, activities/arrangements and systems
- for project risks, could disrupt the project, resulting in delays, and/or adverse quality, delivery or cost impacts
- for longer-term risks, could impair the ongoing viability of the Ecclesia (eg the Ecclesia becomes no longer sustainable)

Risk descriptions need to be clear, accurate and concise, and consider key risk causes.

Near misses, lessons learnt and relevant external incidents and reports should be considered when identifying and determining risks.

3. Risk Analysis

Controls to manage the likelihood and/or consequence of risks to the Ecclesia should be identified.

In assessing controls for importance and effectiveness, consideration should be given to whether the control is:

- fit for purpose (eg the control is relevant to the risk and is in place and reliable)
- appropriate (eg the control provides sufficient coverage to mitigate the full extent of the risk, including addressing risk causes)
- efficient (eg the control is workable and reasonable, and reflects a practical approach to mitigating the risk, including not over-controlling the risk or primarily creating documents or bureaucracy).

4. Risk Evaluation

Evaluation involves determining the inherent, residual and target levels of a risk.

- The *inherent* risk level is the estimated level of risk if there were no existing controls or if all controls in place were to fail
- The *residual* risk level is the estimated level of risk based on existing controls, considering their suitability and effectiveness
- If additional controls are required, the *target* risk level is the risk level if the proposed additional controls are implemented and they work as intended.

The risk should be assessed by considering the likelihood of it occurring and the severity of the consequence if the risk does occur.

Several controls might be needed to reduce a risk to a tolerable level (ie within the Ecclesia's risk appetite). Some of these controls may be more effective and therefore more critical than others (ie key controls). It is important that key controls for mitigating the risk are identified.

The following matrix provides likelihood and consequence ratings that can be used to assess risks.

	Very Likely	Likely	Unlikely	Very Unlikely
Catastrophic	Extreme	Extreme	High	Medium
Major	Extreme	High	High	Medium
Moderate	High	High	Medium	Medium
Minor	High	Medium	Low	Low
Insignificant	Medium	Low	Low	Low

A further guide to the above likelihood and consequence ratings is provided in Attachment 1.

5. Risk Appetite and Treatment

Risks are to be managed to a level where they are “*As Low As Reasonably Practicable*.” This means that the risk is within the Ecclesia’s tolerance limits and the cost or effort of further reducing the risk would exceed the benefit of any additional risk reduction.

In relation to risk appetite, the Ecclesia has a low tolerance level for risks that adversely impact achievement of any of the following:

- Maintaining the health, safety and wellbeing of all Ecclesia attendees, including Members, visitors, Children, Volunteers and any onsite contractors. This may include their physical, spiritual and emotional wellbeing
- Maintaining the good name and reputation of the Ecclesia as part of the body of Jesus Christ
- Maintaining the ongoing viability of the Ecclesia.

6. Risk Assessment

In summary, the following should be identified when conducting a risk assessment (eg of an Activity or project):

- the Activity or project, including the date
- the designated risk owner
- the risks, taking into account key risk causes
- the controls in place to mitigate the identified risks; in particular, the key controls
- the assessed risk levels
- any additional controls needed to further reduce the risk levels, and the target date for these additional controls to be implemented.

7. Monitoring and Review

Designated risk owners are to review risks they ‘own’, including mitigating controls. To assist with this process, risk assessments are to be prepared and implemented.

Risks will normally be reviewed when events or projects are planned (eg prior to an Ecclesial Activity), after an incident, when there is a major change to a key process, or where legislative or regulatory requirements could impact the Ecclesia. Corporate and long-term risks should be reviewed annually.

Monitoring risks is particularly important if the residual risk level is extreme or high, including where additional controls are proposed to further mitigate the risk.

Where deemed necessary by the Management Committee (MC), assurance reviews may be carried out to assess the effectiveness of risk management in the Ecclesia (eg an independent review of safety).

8. Communication and Consultation

Opportunities to improve risk management should be raised at appropriate forums, such as formal meetings of the MC.

Ecclesia attendees, together with Volunteers and onsite contractors, are encouraged to promptly report any risks or issues, including new or emerging risks. The following is a summary of the communication and escalation process for Ecclesia risks:

- risks should be promptly communicated to any MC Member, who will ensure the risk management framework is followed
- risks of an operational and/or project nature should be discussed by the MC, as appropriate.

J.4 RESPONSIBILITIES

Role	Responsibilities
Management Committee (MC)	<ul style="list-style-type: none">• Approve and maintain this policy and procedures. Demonstrate a positive risk management culture, including implementing the risk management framework in the Ecclesia• Ensure risk management is part of planning and decision making• Maintain a watching brief on any major risks and emerging or new risks• Review the Ecclesia's corporate and longer-term risks• Set the Ecclesia's risk appetite, as appropriate• Monitor implementation of this policy and procedures• Update this policy and procedures as necessary• Arrange independent assurance reviews, as and when deemed necessary• Develop, approve and/or implement risk assessments
Designated risk owners	<ul style="list-style-type: none">• Develop, approve and/or implement risk assessments• Ensure risks are managed to a level where they are "<i>As Low As Reasonably Practicable</i>", including that controls to mitigate the risks are operating• Ensure any necessary additional controls are implemented by the target date
Ecclesial attendees	<ul style="list-style-type: none">• Implement this policy and procedures• Promptly inform any MC member of risks they identify, including any new or emerging risks

J.5 AWARENESS

This policy and procedures is to be made available to all Members. Any Volunteers and onsite contractors are to be made aware of relevant risks and risk management requirements.

J.6 RECORDS

Risk assessments and the outcomes of any assurance reviews are to be maintained for a minimum of 10 years.

J.7 DEFINITIONS

Term	Definition
Risk	The effect of uncertainty on objectives, whether positive or negative. This includes the chance of something happening that could adversely impact the Ecclesia's operations or its attendees, including Children
Risk appetite	Risk appetite is aligned to the amount and type of risk the Ecclesia is willing to accept prior to implementing additional controls to further reduce the risk level
Risk assessment	Records the Activity or project, the designated risk owner, the risks to the Activity or project, the key controls, the assessed risk levels, and any proposed additional controls and the target date for implementing these controls
Risk management	Activities and processes used to oversee and control risks that can affect the Ecclesia

Term	Definition
Risk management framework	The processes used to identify, assess and manage risks, and identify opportunities to improve risk management
Risk owner	The person assigned ownership of a risk (eg an Activity Coordinator)
Risk treatment	Refers to controls in place to manage a risk of the Ecclesia to level where it is "As Low As Reasonably Practicable"

J.8 ATTACHMENT 1 – RELEVANT RISK TABLES

1. Risk Likelihood Table:

Likelihood of Occurrence	Description
Very Likely	Is almost certain to occur within the foreseeable future or within the project lifecycle
Likely	Is likely to occur within the foreseeable future or within the project lifecycle
Unlikely	Is not likely to occur within the foreseeable future or within the project lifecycle
Very Unlikely	Will only occur in rare or exceptional circumstances

2. Risk Consequence Table:

Consequence of Occurrence	Description
Catastrophic	<ul style="list-style-type: none"> Financial loss > \$50,000 Substantial negative media coverage, significant loss of reputation/credibility, investigation by Appropriate Authorities or regulator Issue has disastrous impact on achievement of the Ecclesia's objectives Serious, wilful compliance Breach, criminal negligence or act, significant prosecution, fines or litigation, regulator or Government censure Critical systems are unavailable for > 1 month at a crucial time A Child is Abused Serious injury requiring hospitalisation; disability, fatality Significant Breach of <i>Safeguarding Children Policy</i>/Code of Conduct Critical incident or high level of stress to parties involved Critical behavioural issues Severe stress/trauma requiring extensive clinical/professional support for multiple individuals
Major	<ul style="list-style-type: none"> Major financial loss; \$10,001 - \$50,000 Negative media coverage/loss of reputation Issue has significant impact on achievement of the Ecclesia's objectives Deliberate Breach or gross negligence, formal investigation, disciplinary action, Report to Appropriate Authorities or regulator requiring major corrective action Critical systems unavailable for 1 month, or a series of prolonged outages Major breach of <i>Safeguarding Children Policy</i>/Code of Conduct Injuries requiring hospitalisation Major behavioural issues A Child missing from the main group or at risk of Abuse Major stress/trauma requiring ongoing clinical/professional support
Moderate	<ul style="list-style-type: none"> Moderate financial loss; \$3,001 - \$10,000 Short term negative media coverage/loss of reputation, modest impact Issue has a moderate impact on achievement of the Ecclesia's objectives

Consequence of Occurrence	Description
	<ul style="list-style-type: none"> Negligent compliance Breach, lack of good faith evident, review required, Report Breach to Appropriate Authorities or regulator with prompt correction to be implemented Critical system unavailable for < 1 month Medical treatment required Moderate behavioural issues Complex welfare and/or health issues Stress/trauma event requiring clinical/professional support
Minor	<ul style="list-style-type: none"> Minor financial loss; \$500 - \$3,000 Local reputational damage, negligible impact Issue resolved with minor impact on achievement of the Ecclesia's objectives Critical system unavailable for several days Compliance Breach, objection/Complaint lodged, Reportable incident to Appropriate Authorities or regulator with no follow up Environmental surroundings may contribute to a Child being at risk Minor behavioural issues Minor injury, altercation or mishap. Minor medical treatment or support for stress/trauma required
Insignificant	<ul style="list-style-type: none"> Minimal financial loss; less than \$500 Any media attention quickly remedied, no impact Negligible impact on reputation Issue resolved by routine management Critical system unavailable for 1 day Innocent procedural compliance Breach, evidence of good faith, incident is not Reportable to Appropriate Authorities or regulator Very minor injury; no or minor medical treatment or support for stress/trauma required

3. Risk Level Action Table:

Assessed Residual Risk Level	Action to be Taken
Extreme	<ul style="list-style-type: none"> Activity or project must be suspended immediately until risk can be eliminated, controlled or reduced to a lower level The MC closely monitors and evaluates the appropriateness and effectiveness of controls The MC monitors all extreme risks
High	<ul style="list-style-type: none"> Activity or project must not proceed without approval of the MC The MC and designated risk owner regularly monitor and evaluate the appropriateness and effectiveness of controls The MC monitors all high risks
Medium	<ul style="list-style-type: none"> Risk is considered acceptable The designated risk owner monitors and evaluates the effectiveness of controls
Low	<ul style="list-style-type: none"> No significant risk exists The designated risk owner monitors the risk and manages it through routine procedures and controls

Appendix K: Punchbowl Christadelphian Ecclesia Inc. Pastoral Care Policy and Procedures (as at 1 August 2014)

K.1 FOREWARD

The preparation and issue of the pastoral care policy and procedures for Punchbowl Christadelphian Ecclesia Incorporated recognises that as Brothers and Sisters of Jesus Christ we have a particular duty of care for those within the Ecclesia who may be vulnerable or have special needs.

The policy and procedures in this document do not impinge on, but are supplementary to, the Ecclesia's *Safeguarding Children Policy*. As such, in any instances where the victim of alleged abuse is under 18 years of age when the alleged abuse occurred, the Ecclesia's *Safeguarding Children Policy* shall apply.

The policy and procedures in this document are designed to provide Ecclesial Members with information and guidance aimed at preventing pastoral abuse from occurring within the Ecclesia and for dealing with any such situation should it unfortunately arise. The details that follow also include relevant Bible principles that underpin this policy and its application.

K.2 INTRODUCTION

Punchbowl Christadelphian Ecclesia Incorporated ("the Ecclesia") conducts a range of activities that may involve the provision of pastoral care and guidance to individuals. This could include preparing a person for baptism or providing advice, support and counselling to someone during a time of grief or hardship or in meeting special needs. During such activities, the person providing the instruction, guidance, advice or support may be in a position of influence or authority. Whenever an individual in a role of authority takes advantage of his or her position and power to further their own personal interests at the expense of or to the detriment of another, it is considered abuse. This is not only the case where children are involved, but with adults as well. It is abuse where:

- (a) there is an imbalance of power, authority, experience and responsibility between the person providing the instruction, guidance, advice or support and the person receiving it, and
- (b) this imbalance is exploited or misused for personal benefit or gain at the expense/to the detriment of the interests of the other.

Due to this imbalance, there can be no mutual consent to a relationship of any kind, especially not a physical one. In such instances, the person providing the guidance, advice or support is responsible for always keeping appropriate 'boundaries' and under all circumstances. This includes taking the lead in identifying and managing all associated risks, and maintaining purity and propriety in all relationships.

This document provides guidance for Ecclesial members. Relevant Bible teachings that provide a basis for the Ecclesia's pastoral care policy and procedures appear in Attachment 2.

K.3 DEFINITIONS and SCOPE

For the purpose of this policy and procedures document ("the policy and procedures"):

- a pastor can be anyone in the Ecclesia who is in a position of authority, power or trust in providing leadership, teaching and guidance to individuals, and may include speakers, Arranging Brothers (AB), Sunday School teachers, youth leaders and those who provide instruction to baptism candidates. Where a person performs such a role in the Ecclesia, the words of the Apostle Peter provide an appropriate guide:

"Be shepherds of God's flock that is under your care, serving as overseers—not because you must, but because you are willing, as God wants you to be; not greedy for money, but eager to serve; not lording it over those entrusted to you, but being examples to the flock. And when the Chief Shepherd appears, you will receive the crown of glory that will never fade away." (1 Peter 5:2-4)
- an adult is a person who is 18 years of age or over.

- pastoral abuse may include sexual and emotional abuse, improper material/ financial gain or predatory behaviour.
- unless the context signifies otherwise, reference to the Ecclesia/Ecclesia's/Ecclesial is a reference to Punchbowl Christadelphian Ecclesia Inc.

The policy and procedures apply to adult Members of the Ecclesia (although a scenario involving an adult from another Ecclesia is also covered generally in 6.2.5).

The policy and procedures do not apply to the relationship that exists between or situations involving a husband and wife.

While individual situations may differ, by way of a general guide pastoral abuse could be deemed to have occurred where:

- (a) an adult in the Ecclesia is in a position of influence, power or authority in relation to another adult(s) [eg provides instruction, guidance, advice or support to another adult(s)]; and
- (b) an imbalance of power, authority, knowledge or experience exists between the two; and
- (c) the adult takes advantage of his or her position/influence/power/authority to further their own personal interests at the expense of or to the detriment of the interests of the other adult(s) involved. This could include personal interests of a sexual or improper material or financial nature; and
- (d) the disadvantaged adult(s) involved discloses to a member of the Ecclesia's AB that they have been the victim of alleged pastoral abuse; or
- (e) a Member of the Ecclesia with knowledge of the situation discloses to a member of the Ecclesia's AB that pastoral abuse has allegedly occurred.

While the policy and procedures apply specifically to activities arranged/conducted by the Ecclesia, the principles underpinning the policy and procedures may be applied more broadly.

K.4 PRINCIPLES

The following principles underpin the Ecclesia's pastoral care policy and procedures:

- (a) Pastoral care, trust, faithfulness and respect are fundamental building blocks of the house of the living God, the Ecclesia.
- (b) Pastoral abuse violates the teachings of the Bible, may disgrace the Ecclesia and is counterproductive to the ministry of Christ and the Gospel.
- (c) Pastoral abuse is harmful to the victim's physical, social, emotional and spiritual development and wellbeing.
- (d) The Ecclesia has a duty of care to prevent pastoral abuse occurring during activities arranged and conducted by the Ecclesia.
- (e) While all brothers and sisters in Christ have personal responsibility to *"live self-controlled, moral, and godly lives in this present world"* (Titus 2:12) and to treat each other with love and respect, as the man is the head of the woman (1 Corinthians 11:3) and represents Christ to an Ecclesia, so brothers in the Ecclesia (in particular AB, teaching brothers, Sunday School teachers and youth leaders) have a special duty of care to provide faithful and Christ-like leadership. This includes not misusing or exploiting their authority or position of trust for personal advantage (particularly when dealing with individuals who may be vulnerable due to personal circumstances).
- (f) Where advice or counselling is provided to an adult, it must be offered and provided solely to advance the interests of the individual receiving it. It is not to be used for the personal advantage or inappropriate gain by the person providing it.

- (g) In dealing with an allegation of pastoral abuse, the Ecclesia will respond with sensitivity, objectivity, confidentiality, timeliness, fairness and truthfulness.

K.5 POLICY

The Ecclesia has adopted the following policy in relation to pastoral care:

- (a) The Ecclesia will take all reasonable steps to protect its Members from the risk of pastoral abuse during Ecclesial activities.
- (b) The Ecclesia will assist and support any Member of the Ecclesia who is found to be a victim of pastoral abuse. This assistance and support may also extend to the victim's family and to the perpetrator's family.
- (c) While all Members are personally responsible for their behaviour and the Ecclesia has a duty of care for all Members, when making Ecclesial decisions concerning a Member who claims to have been subject to pastoral abuse, the interests and welfare of the Member will be the prime consideration.
- (d) Information will be made available to Ecclesial Members concerning preventing pastoral abuse within the Ecclesia and the procedures for dealing with an allegation of pastoral abuse.

K.6 PROCEDURES

K.6.1 Preventative Measures

- 6.1.1 At any meeting involving the provision of pastoral instruction, guidance or counselling by a Member of the Ecclesia to another adult (such as preparing someone for baptism, or providing advice, support or counselling to someone during a time of personal grief or hardship etc), responsibility for risk management to ensure that trust is not breached rests with the person providing the instruction, guidance or counselling. In particular, where the meeting involves an adult of the opposite sex:
 - (a) the meeting should not be 'one-to-one'. For instance, another adult should also be present at the meeting or at least be accessible at the venue where the meeting is held (eg another adult should be present in the house if the meeting is held in a house and the door to the meeting room should be left open etc);
 - (b) a barrier (eg a table or, if no such barrier is available, distance) should be between the person providing the instruction, guidance or counselling and the counselee at all times;
 - (c) any form of physical contact should be avoided.
- 6.1.2 Where an adult approaches a 'pastor' in the Ecclesia asking for specialist guidance and counselling, consideration should be given in the first instance by the 'pastor' to referring the individual to an independent/external professional advisor/counsellor.
- 6.1.3 The AB in the Ecclesia are responsible for disseminating the policy and procedures in the Ecclesia. AB and those who may be involved in providing pastoral instruction, guidance or counselling (such as preparing someone for baptism) should familiarise themselves with the policy and procedures, including the principles which underpin it, the Bible teachings which support it and the preventative measures that can be taken to minimise risk.

K.6.2 Allegations of Pastoral Abuse

- 6.2.1 Any adult in the Ecclesia who claims to have been subject to pastoral abuse should report the matter as soon as possible to a member of the AB with no real or perceived conflict of interest, who shall ensure that relevant requirements of the policy and procedures are followed.
- 6.2.2 An allegation of pastoral abuse should be investigated by at least two (2) members of the AB. Any such investigation should:

- (a) be conducted objectively, promptly and thoroughly;
- (b) while the investigation process should be transparent and its objectives clearly defined, confidentiality must be maintained;
- (c) permit the adult being interviewed to have an observer/support person present at the interview. Interviews/meetings should be minuted in as much detail as possible under the circumstances;
- (d) not be conducted or determined by anyone with a real or perceived conflict of interest;
- (e) provide for procedural fairness;
- (f) be evidenced-based in making findings;
- (g) use the balance of probability in reaching conclusions.

6.2.3 Any adult within the Ecclesia who discloses to a member of the AB that they have been the alleged victim of pastoral abuse will be encouraged to seek appropriate professional support.

6.2.4 Where the alleged abuse may involve criminal activity (eg physical abuse or rape), the adult will be encouraged by the AB to report the matter immediately to the NSW Police.

6.2.5 In any situation which may fall outside the scope of the policy and procedures (eg if the adult raising the allegation of pastoral abuse against a Member of the Ecclesia belongs to another Ecclesia, or the alleged perpetrator belongs to another Ecclesia etc), the AB shall determine the action to be taken. However, in responding to any such situation, the spirit and principles of the policy and procedures should apply.

K.6.3 Dealing with an Alleged Perpetrator

6.3.1 An Ecclesial Member against whom an allegation of pastoral abuse is made will be afforded procedural fairness in responding to the allegation/s. The AB will, as best they can, also ensure this person's welfare is given support deemed appropriate by the AB. The person will, however, be required to stand down from all Ecclesial appointments (including teaching/speaking/ leadership duties) until the matter is investigated and resolved. At the discretion of the AB and depending upon the risks and circumstances, the Member may also be asked to refrain from attending nominated activities conducted by the Ecclesia.

6.3.2 If an allegation of pastoral abuse is substantiated, consideration should be given by the AB to disfellowshipping the perpetrator as such behaviour is contrary to the teachings of the Bible and could put others at risk. The reason for disfellowshipping the perpetrator should be promptly made known to the Ecclesia by the Recorder with a view to preventing possible further incidents.

6.3.3 If an Ecclesial Member against whom an allegation of pastoral abuse has been made seeks a transfer to another Ecclesia and there are reasonable grounds to suspect that this abuse has occurred or the allegation has yet to be resolved, that Ecclesia will be informed by the Recorder of the allegation and the status of any action taken or proposed.

6.3.4 If an allegation of pastoral abuse is not proven or is shown to be baseless, the Ecclesia will, as far as it is in its power and control, seek to promptly restore the reputation of the affected member. This may consist of spiritual and other support by Ecclesial members, acceptable qualified counselling and other action deemed appropriate by the AB. Assistance should be coordinated by or in consultation with the AB.

6.3.5 The AB may consider taking action against a Member where investigation proves an allegation of pastoral abuse raised by that Member to have been vexatious, malicious, frivolous or mischievous.

6.3.6 Perpetrators require professional assistance. They need to recognise that their behaviour is unacceptable to God and be willing to face the consequences of their behaviour. The Ecclesia may seek professional help for a perpetrator which should be coordinated by or in consultation with the AB.

K.6.4 Support for the Victim and Families

6.4.1 The Ecclesia will, as far as it is in its power, expertise and control, assist and support the wellbeing of

any Member of the Ecclesia who is a victim of pastoral abuse. This may consist of spiritual and other support by Ecclesial members, acceptable qualified counselling and other action deemed appropriate by the AB. Assistance should be coordinated by or in consultation with the AB. The privacy of the victim is to be respected. Assistance may also be extended, where considered appropriate by the AB, to the victim's family and/or to the perpetrator's family.

K.6.5 Application for Ecclesial Membership

- 6.5.1 An application for Ecclesial membership by a person who has been found to have committed pastoral abuse shall be treated by the AB in the manner set out in the Ecclesial Guide as though that person had been disfellowshipped by another Ecclesia.
- 6.5.2 An application for Ecclesial membership by a person who is alleged to be involved in pastoral abuse and the allegation has not been resolved, shall not be considered by the AB until the allegation has been resolved.
- 6.5.3 Whether the person has been disfellowshipped or not, or regardless of whether the allegation has been resolved, the AB, in considering an application for membership, shall take into account the wellbeing and interests of Ecclesial members, and potential risks to the Ecclesia. Concern for the wellbeing and interests of the Ecclesia and its members, and any victim of pastoral abuse, together with potential risks is sufficient reason to refuse or withhold membership.
- 6.5.4 Any application for Ecclesial membership by a person found to have committed pastoral abuse must be in writing and should:
- (a) wholeheartedly acknowledge the wrong the person has done;
 - (b) clearly state what steps they have taken to seek rehabilitation. Steps could include treatment by a recognised expert. Documentary evidence may be sought by the AB that such treatment has been undertaken;
 - (c) outline specific steps they will take to not reoffend.
- 6.5.5 A person found to have committed pastoral abuse and granted membership to the Ecclesia should not expect to have any formal position within the Ecclesia (including a teaching/speaking/leadership role), and could, at the discretion of the AB and depending upon the circumstances, be excluded from certain Ecclesial activities as deemed appropriate by the AB.
- 6.5.6 Members of the Ecclesia are to be informed by the Recorder of the application for membership by a person found to have committed pastoral abuse before Ecclesial membership is granted or refused by the AB. The AB, in reaching a decision on Ecclesial membership, will take feedback from Members of the Ecclesia into account.

K.7 ATTACHMENT 2 - RELEVANT BIBLE TEACHINGS

Relevant Bible tenets which underpin the Ecclesia's pastoral care policy and procedures are as follows:

1. The Bible teaches that in all things we should *"do all to the glory of God"* (1 Corinthians 10:31). This provides the overarching goal and guide for planning, managing, conducting and deciding all matters within the Ecclesia.
2. The Bible teaches that we should practice the commandments of Christ and the fruit of the spirit (John 14:15, 15:14, Galatians 5:22-24; Ephesians 4:17-20; Philippians 4:8). The Bible teaches that all forms of abuse, including pastoral abuse, violate the commandments of Christ and are contrary to the fruit of the spirit (Galatians 5:19-21; Ephesians 5:3-12; 1 Corinthians 6:9-10).
3. The Bible teaches that we are to be holy and to abstain from all appearance of evil (Peter 1:15-16; 1 Thessalonians 5:22). Pastoral abuse is contrary to this.
4. The Bible teaches that we are to love God with all our heart, strength, soul and mind, and to love our neighbour as our self. (Deuteronomy 6:4-5; Leviticus 19:18; Matthew 19:19; 22:37-39; Mark 12:29-31; Luke 10:27; Romans 13:9; Gal 5:14; James 2:8).
5. The Bible teaches that we have a particular duty of care for those within the Ecclesia who may be vulnerable or have special needs (Psalm 82:3-4; Proverbs 31:9; Acts 20:35; James 1:27).
6. The Bible teaches that rather than serving our own interests, we are instead to seek what is in the best interests of others (Philippians 2:3).
7. The Bible teaches that the Ecclesia should seek to recover those who are *"overtaken in a fault"* and err from the truth (Galatians 6:1; James 5:19-20).
8. The Bible teaches that those who have oversight of the Ecclesia have a particular responsibility to care for its Members as faithful *"shepherds of God"* (1 Peter 5:2-4) and protect the Ecclesia from *"wolves"* (Acts 20:28-32).