



**CENTENARY**  
EVANGELICAL CHURCH

# Safe Ministry – Child Protection Policy

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# 1. Introduction

## 1.1. Statement of Commitment

Centenary Evangelical Church Inc. is committed to creating a safe, nurturing, and supportive environment, for children to grow up in, be taught by, and be cared for.

Any behaviour which exploits the special position of trust and authority between an adult in a position of authority and a child, or otherwise involves the Mistreatment of a child, is unacceptable and sinful.

Centenary Evangelical Church Inc. is committed to ensuring the safety of children at the Church, preventing mistreatment of any kind, and conducting itself in a manner so as to:

- a) ensure that all children are respected and valued;
- b) minimise the risk of Mistreatment of children at the Church;
- c) ensure that leaders and programs are safe for children;
- d) ensure that all cases of suspected mistreatment and misconduct are handled thoroughly, with integrity, and with the proper involvement of public authorities.

Centenary Evangelical Church Inc fulfills these commitments by adherence to the policies and procedures set out in this Policy.

Centenary Evangelical Church Inc is committed to minimising harm to children by:

- a) Vetting all persons (including Staff) before they are permitted to care for or supervise, children at a Centenary Evangelical Church Inc event.
- b) Maintaining a Child Worker Register of all Approved Child Workers.
- c) Requiring all persons (including staff) who undertake any role which involves the care or supervision of children at a Centenary Evangelical Church Inc event to be an Approved Child Worker.
- d) Applying a risk management process and mitigations for high-risk events.
- e) Teaching and encouraging children:
  - that they should feel safe at all times.
  - about acceptable and unacceptable behaviour in general.
  - that there is no secret too awful, no story too terrible, that they can't share with someone they trust.
  - to say 'no' to anything that makes them feel unsafe or uncomfortable.
  - to tell their parents, leaders or a Safe Ministry Contact of any suspicious activities or people.
- f) Letting children know who is responsible for taking care of them at Church events.

- g) Making sure children are safe by monitoring their activities and ensuring their environment meets all safety requirements.
- h) Taking anything a child says seriously and following up their concerns.
- i) Listening to and letting children know that Staff or Safe Ministry Contacts are available for them if they have any concerns.
- j) Not promising confidentiality to a child but care, sensitive communication, and thorough concern.

## 1.2. Statement of Policy

This document sets out the Church's Safe Ministry Policy and Risk Management Strategy which the Church has adopted in order to provide a safe environment for people, especially vulnerable people and children, protect people from abuse and mistreatment, report mistreatment or suspected mistreatment, and to ensure that a caring and appropriate response is taken should harm occur.

## 1.3. Scope

The Policy & Procedures apply to:

- All ministries authorised by or under the control of the church, including those ministries undertaken at or away from the church's premises.
- All leaders and staff within the church or engaged by the church.
- All members, attendees and visitors at church events.

## 1.4. Authority & Review

This Policy has been approved by the Elders Council of Centenary Evangelical Church Inc. It is reviewed by the Elders Council on an annual basis, in accordance with sections 171 and 172 of the WC(RMS) Act. It will also be reviewed by the Elders Council after any significant incident (including any significant breach of this policy).

The Elders Council and Management Committee of Centenary Evangelical Church Inc. are committed to implementing the Policy and training our Leaders and Team Members in its content and application.

## 1.5. Obligations

### Spiritual Obligations

The core beliefs of the church require us to treat all people with love and dignity and to care for those who are less powerful and in need of nurture and protection.

### Legal Obligations

The church and its leaders are subject to current Federal and State legislation and principles established through common law, including the Child Protection Act 1999 (QLD), Child Protection Reform Amendment Act 2017 (QLD) and Working with Children (Risk Management and Screening) Act 2000 (QLD).

### Ethical Obligations

All people have the right to be safe and protected while in the care of the church. Leaders are responsible for the safety and welfare of people in their care.

## 1.6. Definitions

**Approved Child Worker** means a person who is over 18 and has been approved to work with children under the Safe Ministry Policy;

**Child Worker Register** refers to the electronic register maintained by Centenary Evangelical Church Inc which records the name of each Approved Child Worker;

**Safe Ministry Administrator** refers to the volunteer/staff member of Centenary Evangelical Church Inc. who is responsible for administration in relation to the Child Worker Register.

**Excluded Incident** means an incident which is suspected to, or is reported as involving only minor Mistreatment, and which has one or more of the following characteristics:

- a) the suspected or reported Mistreatment had no physical or sexual element and the age difference between the child and the alleged offender is less than 2 years;
- b) the suspected or reported Mistreatment is between two children, has no sexual element, involved no serious injury, and the difference in age between the two children is less than 2 years;
- c) the suspected or reported Mistreatment has no sexual element, the child who has suffered the Mistreatment is 15 years or older, and neither the parent nor the child wish for the matter to be referred to the Relevant Government Department;
- d) the suspected or reported Mistreatment is between child siblings, and the parents do not wish for the matter to be referred to the Relevant Government Department;

**Grooming** occurs when an adult person engages in conduct that leads to abuse of a child or vulnerable person. This can take place anywhere and by anyone. Grooming is conduct that creates and then exploits opportunities in sexual activity. Grooming is a subtle process (hard to notice) that happens over time. Grooming involves a graduation or progression of behaviour.

**Mistreatment** means any activity or inactivity (whether deliberate or careless) which causes harm to a person's physical, psychological or emotional wellbeing and includes any kind of abuse or behaviour causing harm, including:

- a) physical abuse, e.g., beating, shaking, burning, biting, causing bruise or fractures by inappropriate discipline, giving children alcohol, drugs or inappropriate medication;
- b) emotional or psychological abuse, e.g., constant yelling;
- c) verbal abuse e.g., insults, swearing, criticism, bullying;
- d) neglect, e.g., not giving children sufficient food, clothing, enough sleep, hygiene, medical care, leaving children unsupervised in an age-inappropriate way; and
- e) sexual abuse or exploitation, e.g., sexual jokes, sexual touching, exposing children to sexual acts or pornography, Grooming;

**'Reasonable grounds to suspect'** is a situation where a person has some information that leads them believe that abuse, neglect or exploitation has taken place, is taking place, or may take place. It comes with a low burden of proof (in fact, no proof is needed at all), but is based on some information. Questions that may help a person to determine whether they have 'reasonable grounds to suspect' might include:

- a. Could you explain to another person why you suspect something? This helps to make sure that your suspicion is based on information, even if you have no proof.
- b. Would an objective other person, with the same information as you, come to the same conclusion? This helps to make sure that your suspicion is as objective as possible.

**Relevant Government Department** refers to the Department of Children, Youth Justice and Multicultural Affairs;

**Safe Ministry Contact** means a person approved by the Elders Council to be a point of contact to whom you can report safety concerns. They will advise and follow up on the concerns, promote safe ministry and undertake a number of supervisory functions set out in this Safe Ministry – Child Protection Policy. They are to observe practices at Centenary Evangelical Church Inc. and take steps to make sure people are safe.

**Child/Children** means an individual under the age of 18.

**Under 18 – Approved Child Worker** means someone under the age of 18 who has been approved to work with children under this policy. As someone under 18, a Junior Leader will always be supervised by an Approved Child Worker and must never be alone with another (unrelated) adult in their role (per our interaction guidelines).



## 2. Distribution

This policy will be made available electronically (on the Church's website and on Planning Center) as well as being discussed and publicised at least once every 6 months – on the first Sunday in June and December at the regular services held by the Church - by referring to it in a service and providing physical copies at the service.

All prospective Members will also be provided with a copy of this policy and are required to declare that they have read this Policy, before being approved as Members.

## 3. External Policies

We acknowledge that some ministries in the church might have external affiliation with other organisations. These organisations will possibly have policies governing the issues of member and/or child safety and abuse. The church's policy and procedures are not intended to replace or conflict with other policies, but instead to operate in conjunction with them.

Any concerns or discrepancies between policies are to be raised with the Safe Ministry Contacts during planning of joint events, who will report to the Elders Council on possible way forward.

## 4. Key Personnel

### **Safe Ministry Contacts:**

- Andrew McPhail – amcp1t516@gmail.com
- Ethel Wee - ethelsoh@gmail.com

### **Senior Pastor**

- Benjamin Ho - ben@centenaryev.church

### **Management Committee Members**

- Andrew Faulkner (Secretary) – Andrew@centenaryev.church
- Ellen Bidari (Treasurer) – ellenbidari@gmail.com

### **Safe Ministry Administrator**

- Debbie Faulkner – Debbsfaulkner@gmail.com

### **External Reporting**

- Child Safety Services Enquiries Unit - 1800 811 810

## 5. Responsibilities

While the responsibility to protect people is shared by all who work at or with Centenary Evangelical Church Inc., some individuals have specific obligations with which they must comply.

### 5.1. Elders Council

The Elders Council must:

- 1) Appoint at least two Safe Ministry Contacts and must always ensure that there are at least two Safe Ministry Contacts who are unrelated to any of the Pastors of the Church, one being a female. Ideally there will be one male and one female in these roles.
- 2) Undertake Board Member safe ministry training.
- 3) Review the Safe Ministry Policy at least annually.
- 4) Review and approve Risk Management Plans.
- 5) Promote Safe Ministry practices and compliance with all aspects of this policy.

### 5.2. Senior Pastor

The Senior Pastor must:

- 1) keep a record of every report which, at a minimum:
  - a) identifies the child affected and any alleged wrongdoer (by a pseudonym); and
  - b) contains a summary of the report made, omitting identifying details.
- 2) Undertake Board Member safe ministry training.

### 5.3. Safe Ministry Contact:

Safe Ministry Contacts are appointed by the Elders Council. The Safe Ministry Contacts must:

- 1) Complete "Board" level Safe Ministry training to maintain their positions.
- 2) Be an approved Child Worker.
- 3) Make themselves available as a point of contact for any Safe Ministry queries or concerns.
- 4) Review the Safe Ministry Policy Annually with the Elders Council.
- 5) Review the Risk Management Assessment and Mitigation Plans before lodging to the Elders Council for approval.
- 6) Assist Ministry Team leaders in Safe Ministry, such as recruitment processes and Risk Management Plans.

### 5.4. Approved Child Workers

Approved Child Workers must:

- 1) hold a current Blue Card or an exemption card which has either been applied for through Centenary Evangelical Church Inc or linked to Centenary Evangelical Church Inc;
- 2) confirm in writing that they have read and agree to abide by the CEC Safe Ministry – Child Protection Policy, and obtain necessary references.
- 3) undertake initial (online) training before commencing to carry out the functions of an Approved Child Worker.
- 4) maintain up to date contact details on Planning Center and to be always able to be contacted via Planning Center (i.e. subscribed to receive Planning Center emails and not remove contact information, specifically phone number and email).
- 5) undertake approved training on Child Safety at least once every two years. Training is provided online at [safeministrycheck.com.au](https://safeministrycheck.com.au) (the “Online Course”). A person who has undertaken training through the Online Course will have that training automatically recorded and sent to the Church.

A person does not need to be a Member to become an Approved Child Worker.

## 5.5. Safe Ministry Administrator

The Elders Council delegates to the Safe Ministry Administrator the responsibility for:

- 1) maintaining the Child Worker Register, with each entry to be retained for 30 years.
- 2) reviewing the Child Worker Register periodically to ensure that any Approved Child Worker, whose Blue Card or exemption card is to expire shortly, renews their Blue Card or exemption card.
- 3) ensuring that the Child Worker Register is kept up to date with the details of each Approved Child Worker’s training details.
- 4) notifying any Approved Child Worker who has not completed training for a period greater than 23 months. If the person still has not completed training for a period greater than 24 months, the Safe Ministry Administrator will notify the Youth & Kids Senior Leader & the Elders Council. If the person still has not completed training for a period greater than 26 months, the person will be suspended as an Approved Child Worker until they complete the training.

## 5.6. Members

- 1) All prospective Members must be provided with a copy of this policy and are required to declare that they have read this Policy before being approved as Members.
- 2) All new Members are encouraged to apply for a Blue Card at the time they apply for membership.

- 3) All new Members (regardless of whether they undertake a role with children) are encouraged to complete the relevant approved level of Safe Ministry video training. Noting for some roles, Safe Ministry video training will be mandatory, such as Grow Group Leaders and their assistants.

## 6. Code of Conduct

All leaders at Centenary Evangelical Church Inc. are required to agree to and abide by the CEC Code of Conduct. It is available [here](#).

### 6.1. Code of Conduct- Additional requirements for Approved Child Workers

The “Code of Conduct - Additional requirements for Approved Child Workers” provides an educative guide to the principles that help inform what are appropriate behaviours and conduct for those supervising and working with children at the Church as Approved Child Workers. The Code is not intended to govern the interactions between family members or private interactions between Church attendees (though many of the behaviours Centenary Evangelical Church Inc expects are applicable in any event as they reflect appropriate Christian conduct).

The Code is not exhaustive and does not foresee every set of circumstances that may arise across the variety of Church events and activities. If a person is in doubt about whether a behaviour is appropriate, that person should refrain from that behaviour or conduct unless and until advised otherwise by the child’s parent, an Elder, or a Safe Ministry Contact.

Centenary Evangelical Church Inc values the social, relational, and interpersonal safety and well-being of children and young people. Centenary Evangelical Church Inc values the role of leaders and mentors in the lives of children and young people by promoting transparent, accountable relationships that promote trust and confidence in the Church and its programs. All Approved Child Workers and Staff in the Church working with children are required to adhere to these additional requirements.

#### 6.1.1. Expected & Encouraged Behaviours

Approved Child Workers are expected to:

- a) behave as a positive role model to children;
- b) treat all children with respect;
- c) refrain from showing favouritism;
- d) help provide an open, family-friendly environment for children;
- e) alert an Elder or a Safe Ministry Contact if an apparent breach of this code is witnessed or suspected;

- f) report suspicions of the Mistreatment of a child in accordance with this Policy; and
- g) respect and adhere to reasonable parental requests.

### 6.1.2. Inappropriate Behaviours

Approved Child Workers are expected to not:

- a) engage in inappropriately rough physical play with a child;
- b) touch a child in an age &/or culturally inappropriate manner<sup>1</sup>;
- c) hold, kiss, cuddle or touch a child, except where situationally appropriate e.g., to comfort a distressed child or to reassure younger children;
- d) spend time alone or remain in a confined or secluded space with a child;
- e) make sexually suggestive comments to a child, including inappropriate compliments about their physical appearance;
- f) show or share sexually suggestive material to a child in any form such as e-mail, text, movie, sound, or picture file;
- g) use profane language;
- h) assist children do things of a personal nature that they can do for themselves (e.g., assist them to go to the toilet);
- i) use corporal punishment to discipline or control a child;
- j) take a child to your home/residence or encourage private meetings outside of Church-sponsored activities except with the approval of the Senior Pastor or the Elders Council (for Church activities) or the child's parents (for private activities); or
- k) upload to the internet recorded photo or video of a child without the permission of that child's parents.

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<sup>1</sup> Certain behaviours may be appropriate for Approved Child Workers in relation to younger children (e.g., picking up and holding a 2-year-old child who is crying) but cease being appropriate as children grow older (e.g., cuddling a 12-year-old child).

### 6.1.3. Interaction Guidelines

- a) Incidents of abuse are unlikely to take place in front of another person. The presence of a witness can assist in clarifying questionable allegations. For these reasons, **two (2) Approved Child Workers will always be present** when working with or supervising children. If an Approved Child Worker must leave the activity (e.g. to take a child to the toilet), the minimum three (3) person rule must always be followed – 2 Approved Child Workers and 1 child OR 1 Approved Child Worker and 2 children.
- b) Approved Child Workers will not visit Children in their homes unless a parent is present.
- c) When transporting Children, an Approved Child Worker should never be alone with a child (other than their own).
- d) All personal conversations are to be carried out within the sight of another Approved Child Worker or in a public place.
- e) Should an activity require undressing or a change of clothes (i.e. at a camp, a beach visit), both adults and children are to respect each other's privacy. Team Members are particularly to set an example and be absolutely above reproach in this. No Team Member will be alone in a room with a child while either is changing. Risk Management Plans should acknowledge if a clothing change will be required for any activities.
- f) Initiations and secret ceremonies are prohibited. All aspects of every child-related programme will be open to observation by parents/guardians.
- g) Approved Child Workers have the right to ask people who do not have a valid reason to be present at Child-related activities to leave. Police may be contacted if such persons refuse to comply with any reasonable request to leave.

### 6.1.4. Digital Interaction Guidelines:

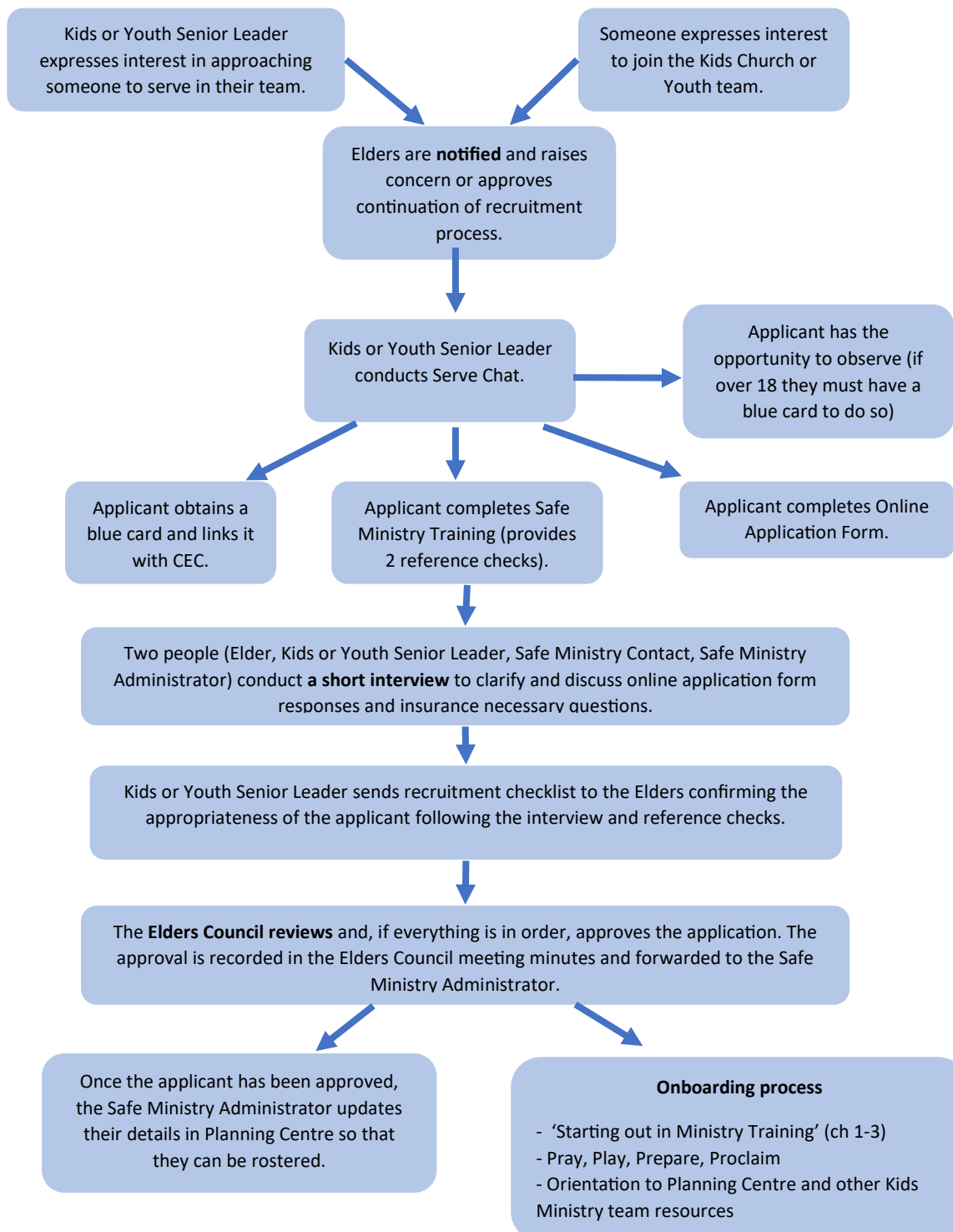
- a) Interaction Guideline 6.1.3(a) is also applicable to all online environments and electronic communications. Therefore, when using an interactive platform (such as Zoom, Skype, iSee) there must always be two (2) Approved Child Workers present from start to finish of the ministry session. Settings must be fixed so that children cannot be admitted to the session until both Approved Child Workers are signed on, and both Approved Child Workers must remain online and present at their screen until all children have exited the online platform. When electronic communications are being sent to children, both Approved Child Workers must be included in all communications as well as parent/s and/or guardian/s. Security settings must also disallow private chat and breakout room functions.
- b) Children must be supervised (by Approved Child Workers being present at their screens) at all times when engaged with online ministry activities.

- c) When logging onto electronic communication platforms, appropriate and clear identification must be maintained at all times. This means the name/handle/link must contain the correct recognisable name of the adult/s involved e.g for someone called Joan Jones; J Joans, Joan Jones, Joan, Miss Jones, Miss Joan would be appropriate. CoolJo, JJ, Jezza93 are not appropriate.
- d) A roll should be marked to indicate which children have been in attendance to online events and platforms.
- e) Approved Child Workers are not to engage in one-on-one private communications with a child. If a child needs to be contacted, this communication should either go via the children's parents, or the parent/s of the child should be included in any communications sent.
- f) Contact details are not to be shared outside the need of administering direct ministry functions and this distribution must have expressed parental (and child) consent.
- g) Approved Child Workers should be mindful of the location and background that they are in when communicating online- such as when accessing video communications this should be done in an appropriate space in the house such as the lounge or dining room, not a bedroom. If done in an outside or public space, be mindful of what can be seen and heard by others both online and within the environment.
- h) Approved Child Workers attire should reflect what would be worn during a regular children's ministry Sunday service if they were serving in person.
- i) Guideline 6.1.3(g) also applies for online environments if a person were to sign into an electronic communication session including but not limited to online forum, chat, Whatsapp group, Zoom session.
- j) Parents of children involved in a particular online ministry must be able to attend/have access to the activity should they wish to.
- k) Centenary Evangelical Church Inc. cannot be responsible for a child's online activity once the child has left a particular ministry activity. We encourage active parental engagement and oversight of a child's online activities.

## 7. Recruitment, Selection & Screening

The following process diagram procedure sets out the required steps to ensure that those working with children are appropriately screened for the ministry they will be performing. It applies to all persons who supervise, teach, or otherwise have responsibility for the care of children at a Church event, including all Staff.

The WC (RMS) Act provide a screening process for people working with children. The Act prohibits people convicted or found guilty of serious sexual offences from working with children.





## 7.1. Transition of Under 18- Approved Child Worker to Approved Child Worker

Whilst an Under 18 - Approved Child Worker will have already undertaken appropriate screening and recruitment steps, given the added responsibility that accompanies being an adult Approved Child Worker, the following steps are to be undertaken following their 18<sup>th</sup> birthday, before they become Approved Child Workers.

1. The applicant needs to apply for a Blue card.
2. The Kids Ministry leader makes a recommendation (after checking the above with Safe Ministry Administrator) to the Elders that the Under 18 – Approved Child worker should be added to the Approved Child Worker register.
3. The Elders agree to this (or not) and note any actions that are to accompany their approval.
  - a) At a minimum, an Elder, Kids Ministry Leader, Safe Ministry Contact or Safe Ministry Administrator conduct a meeting with the applicant to highlight the additional responsibilities of being an adult leader and to reiterate the importance of safe ministry policy compliance – and helping the person think through implications of their now being 18 (i.e. alone with a child is not ok).
4. Once approved, the Safe Ministry Administrator adds them to the Child Worker Register.

## 7.2. Volunteers from other churches

People from other churches can provide care and supervision for children at Centenary Evangelical Church Inc if the following are met:

- 2) Centenary Evangelical Church Inc has:
  - a) received a copy of the person's church's Child Protection Policy and procedures and public liability coverage;
  - b) checked with its insurer that the person's church's public liability is appropriate;
  - c) verified the person's Blue Card is valid and not expired;
  - d) verified with the person's Pastor that they have completed their church's requirements for working with children; And
- 3) The person is under the supervision of an Centenary Evangelical Church Inc Approved Child Worker.

## 8. Procedure – Reporting & Investigation

### 8.1. Reporting Principles

Children and young people can be protected from harm if Mistreatment is reported and dealt with quickly and effectively. Centenary Evangelical Church Inc has adopted the following procedures to ensure that Staff and/or Safe Ministry Contacts respond as **quickly as possible** to any disclosure or report of:

- 1) Mistreatment of a child; or
- 2) a breach of the Code of Conduct or a Risk Management Plan; or
- 3) a concern that an adult at the Church may pose a risk to children, even if no actual Mistreatment is suspected to have occurred.

The priority is ensuring the best interests of the child or young person. If a report of harm is made the safety and wellbeing of the child involved must be the first priority. If a child is at immediate risk of harm action must be taken to remove the danger immediately.

### 8.2. General Considerations

- a) Any disclosure or report of harm must be treated with the utmost seriousness.
- b) All who become aware of a report should exercise confidentiality in relation to what they know.
- c) Allegations of child abuse can have serious effects on the ability of the Church to care for children and families involved and on those they are made against.
- d) It is important that only those directly involved in reporting, assessing, and responding to report are aware of the process, as far as possible. Fair and complete resolution of reports can be put at risk, or the evidence of children and other witnesses can be contaminated if evidence is leaked.

### 8.3. Record Keeping

Every stage of the Reporting and Investigation process must be thoroughly documented. These records may be crucial to the way in which allegations are investigated and followed up whether or not allegations are sustained or acted on.

If a report or disclosure is made, the Safe Ministry Contact or Pastoral Staff Member should listen carefully to what is said to them and record details of the matter. They should collect a written report from whoever received the original disclosure or raised the matter.

All records made for the purpose of recording the making of or responding to allegations or reportable conduct must be:

- a) stored securely by the person making them
- b) Retained for 30 years

The Senior Pastor must keep a confidential record of every report which, at a minimum (i) identifies the child affected and any alleged wrongdoer and (ii) contains a brief summary of the report made. The Safe Ministry Administrator can assist through this process.

#### 8.4. Reporting Incidents

If an Approved Child Worker or any other person at Church witnesses an incident resulting in an injury that is non-trivial or highlights an unsafe practice or environment, they must ensure that someone records it on an [Incident Response Form](#) and submits the form to a Safe Ministry Contact who will report it to the Senior Pastor.

#### 8.5. Reporting Suspicion of Mistreatment

If an Approved Child Worker or any other person at Church is concerned by any significant changes in behaviour or the presence of new unexplained and suspicious injuries of a child or has any other reasons to have concerns or suspicions about possible Mistreatment or Grooming of that child, that person must report it to a Safe Ministry Contact. It is irrelevant whether the harm has been caused at a Church event or by a Church attendee, or at some other place by somebody unconnected with the Church.

If a child or young person is a victim of Mistreatment, Grooming, or sexual abuse, they may show some or all of the following signs:

- 1) regular absences
- 2) developing an unusually close connection with an older person
- 3) displaying mood changes (hyperactive, secretive, hostile, aggressive, impatient, resentful, anxious, withdrawn, depressed)
- 4) using different language or copying the way a new friend may speak
- 5) talking about new friends who doesn't belong to their normal social circle
- 6) having large amounts of money, which they cannot account for
- 7) using a new mobile phone (possibly given to them by a new friend), excessively making calls, videos or sending text messages
- 8) being very secretive about their phone, internet, and social media use.

#### 8.6. Reporting a Disclosure of Mistreatment

If a child discloses Mistreatment to an Approved Children Worker or any other person at Church, that person must report the disclosure to a Safe Ministry Contact or Staff Member.

The adult to whom the disclosure of Mistreatment is made must report the matter directly, rather than asking another adult to report it on their behalf.

A disclosure of harm occurs when someone, including a child, tells you about Mistreatment that has happened or is likely to happen.

Disclosures of Mistreatment may start with:

- “I think I saw...”
- “Somebody told me that...”
- “Just think you should know...”
- “I’m not sure what I want you to do, but...”

When receiving a disclosure of harm:

- a) remain calm and find a private but visible place to talk
- b) don’t promise that you’ll keep a secret; tell them they have done the right thing in telling you but that you’ll need to tell someone who can help keep them safe
- c) only ask enough questions to confirm the need to report the matter; probing questions could cause distress, confusion and interfere with any later enquiries, and
- d) do not attempt to conduct your own investigation or mediate an outcome between the parties involved.

## 8.7. Reporting a concern that someone may pose a risk to children.

If an Approved Child Worker or other person at Centenary Evangelical Church Inc is concerned that someone present at a Church event may pose a risk to children (including grooming behaviour), the person must report that concern to a Safe Ministry Contact.

- 1) If a Safe Ministry Contact receives a report or has their own concern that someone may pose a risk to children, they must report it to the Senior Pastor.
- 2) If the Senior Pastor has a concern that someone may pose a risk to children (whether because of a report or otherwise) he should take whatever immediate steps he considers appropriate (in consultation with an Elder) and refer the concern to the Elders Council for consideration. Safe Ministry Contacts can be consulted, if required.
- 3) Where the Elders Council considers, on reasonable grounds, that a Member or another person who attends the Church may pose a risk to children (whether or not there has been a specific report of abuse, Mistreatment or harm by that person while at the Church, and whether or not that person holds a Blue Card), the Elders Council must:
  - a) if the person is an Approved Child Worker, require the person to cease carrying out the functions of an Approved Child Worker;
  - b) consider whether:
    - i) to require that person’s name recorded in a separate section of the Child Worker Register, as an unsuitable person to have contact with children;
    - ii) to inform the person that they are not permitted to have any contact with children at Church events, save for unavoidable incidental contact;

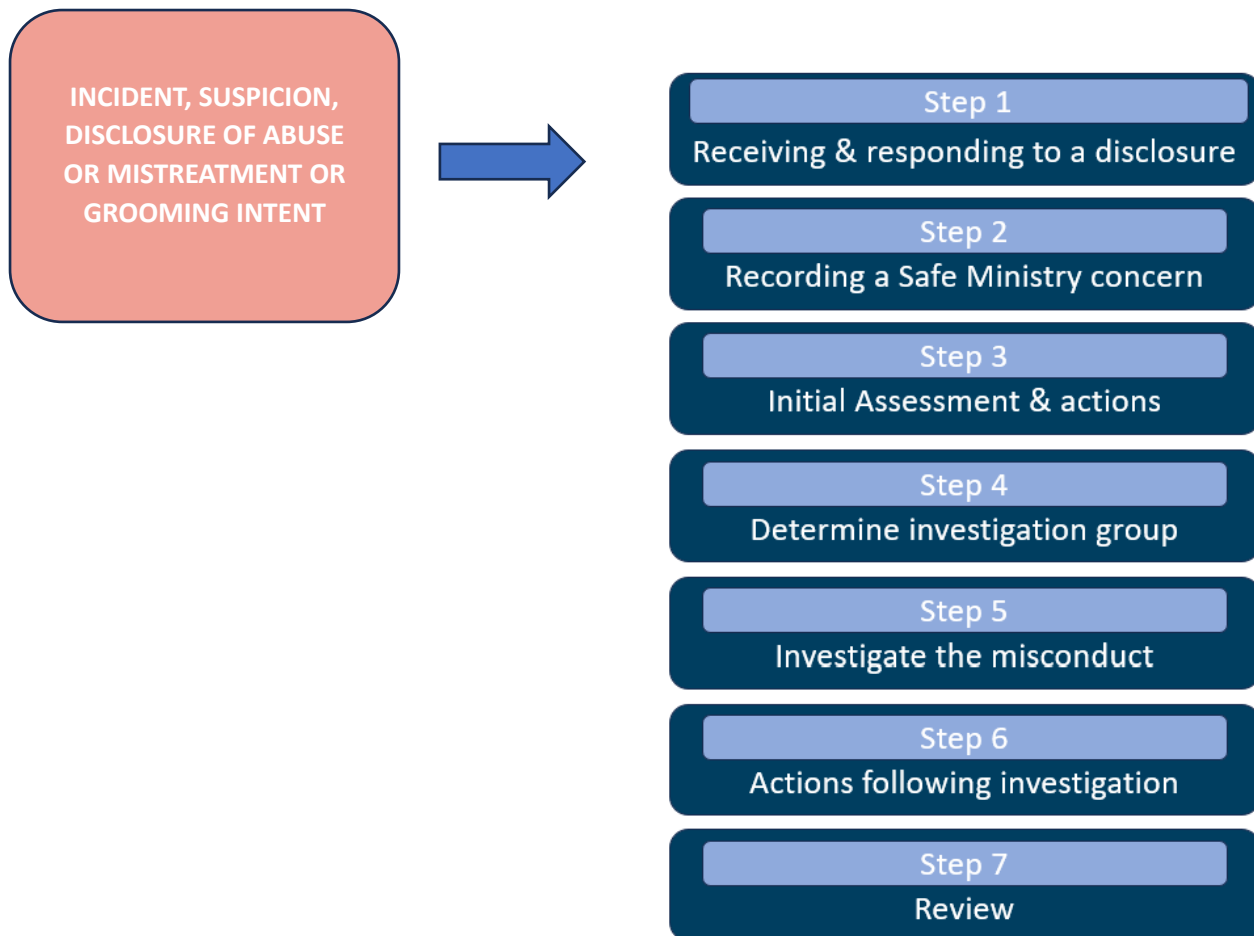
- iii) to require the person be in the presence of, and supervised by, a Pastoral Staff Member or Safe Ministry Contact at any Church event;
- iv) to disclose the identity, and the fact that the Elders Council holds a concern about the risk they pose to children, to other Members and attendees of the Church, and if such disclosure is to be made, the manner and extent of such disclosure;
- v) to take, or recommend the Senior Pastor take, any other step (including that the person be asked to leave the Church and stop attending its events).
- vi) After a report, training material will be audited by the Elders Council. Based on this audit, the processes or procedures will be appropriately modified to mitigate situations where abuse could occur. Any changes to processes or procedures will be communicated to Approved Child Workers within 3 months of the report.

## 8.8. Conflict of Interest

Investigations must be, and be seen to be, fair and unbiased. Fairness, and the perception of it, could be compromised if anyone involved at any stage in responding to the report is, or is seen to be, too closely associated with the accused, or seen to have an interest which may be contrary to the possible outcome of an investigation.

If it is determined that anyone to be involved in either the initial assessment or a subsequent investigation has a conflict of interest, they must not be involved in these steps, and be replaced by another church member with equivalent responsibility.

## 8.9. Receiving and Reporting Procedures (Overview)



## 8.10. Receiving and Reporting Procedures (Steps)



A **disclosure of harm** occurs when someone, including a child, tells you about Mistreatment that has happened or is likely to happen.

### Disclosures of Mistreatment may start with:

- "I think I saw..."
- "Somebody told me that..."
- "Just think you should know..."
- "I'm not sure what I want you to do, but..."

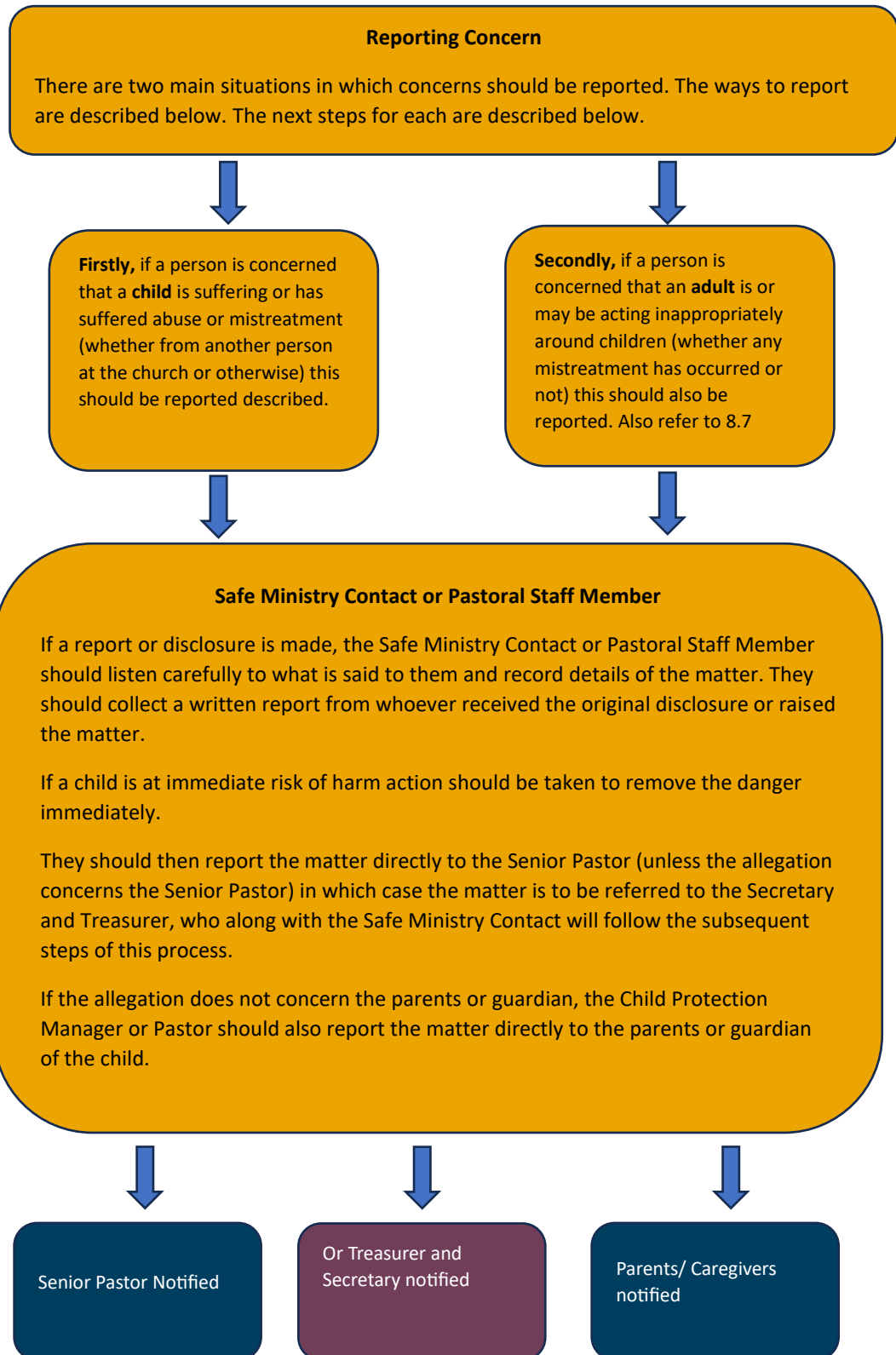
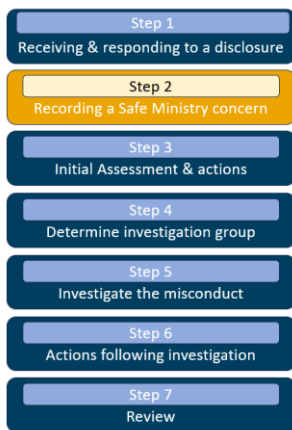
If a child discloses Mistreatment to an Approved Children Worker or any other person at Church, that person **must** report the disclosure to a Safe Ministry Contact or Staff Member.

The adult to whom the disclosure of Mistreatment is made **must report the matter directly**, rather than asking another adult to report it on their behalf.

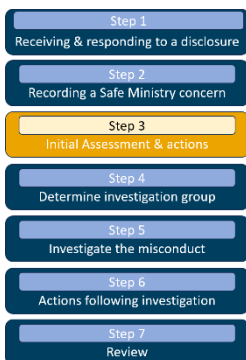
### When receiving a disclosure of harm:

1. remain calm and find a private but visible place to talk
2. don't promise that you'll keep a secret; tell them they have done the right thing in telling you but that you'll need to tell someone who can help keep them safe
3. only ask enough questions to confirm the need to report the matter; probing questions could cause distress, confusion and interfere with any later enquiries, and
4. do not attempt to conduct your own investigation or mediate an outcome between the parties involved.

Report the disclosure to a Safe Ministry Contact or Staff Member







### Initial Assessment

#### Senior Pastor (or Treasurer and Secretary if the allegation concerns the Senior Pastor) + an Elder + a Safe Ministry Contact

The Senior Pastor notifies an Elder of the allegations or suspicion of mistreatment, abuse or harm. The Senior Pastor, *in consultation with the other Elder and a Safe Ministry contact* decide whether the matter should be referred to the Elders Council and/or Police and/or the Department of Communities, Child Safety and Disability Services and what further steps should be taken to identify and minimise any risks to:

- Any child or children who are the subject of the report or disclosure.
- Other children
- If the report implicates an Approved child Walker, the worker against whom the allegation has been made.
- The Church, and
- The proper investigation of the allegation.
- As there may be limited information on which to base the initial risk assessment, it should be reviewed as further information is obtained.

If it is determined that the allegation or suspicion of harm is not frivolous or trivial, obviously untrue or false, or concerns an Excluded Incident, and it includes abuse or alleged abuse, the Police and Centenary Evangelical Church Inc's insurer must be notified of the matter.

The Senior Pastor must keep a record of every report which, at a minimum (i) Identifies the child affected and any alleged wrongdoer (by a pseudonym) and (ii) Contains a brief summary of the report made, omitting identifying details.

If the report involves a complaint against an Approved Child Worker, the fact of the complaint and the date of the complaint, but not any details of the complaint, are to be recorded in the Child Worker Register.

Elders Council notified

Police notified

Department of Communities, Child Safety and Disability Services notified

Secretary notified

Insurer notified

Unless it is determined that the allegation or suspicion of harm is frivolous or trivial, obviously untrue or false, or the report concerns an Excluded incident, an Approved Child Worker who is the subject of a report will have their status as an Approved Child Worker suspended pending the completion of the investigation.

If it is determined that the allegation or suspicion of harm is frivolous or trivial, obviously untrue or false, or the report concerns an Excluded incident, no further steps will be taken.



### Determine Investigation Group

**Senior Pastor (or Treasurer and Secretary if the allegation concerns the Senior Pastor) + an Elder + a Safe Ministry Contact**

If it is determined that the allegation or suspicion of harm is not frivolous or trivial, obviously untrue or false, and that the report does not concern an Excluded incident then an investigation must be undertaken. The Senior Pastor, *in consultation with the Elders and a Safe Ministry contact* convenes an investigation group.

The table below outlines who are to be included in the Investigation Group.

The Senior Pastor, or Safe Ministry Contact must also email the Secretary and the other Safe Ministry Contact(s), to notify them that a report has referred to the relevant Investigation Group, but not the detail of the report. The Secretary may notify and consult with the Church insurer around the management of the report.

**\*\*If referred to the Police or a Government Department, seek advice from them and the Insurer of their recommendations on how to proceed.**

**\*\*Depending on the seriousness of the report, it may be appropriate to engage a competent external investigator who does not know the accused or others involved.**



Convene investigation Group



Notification to Secretary and other Safe Ministry Contacts



Seek advice from police / Government Department / Insurer if appropriate.



External investigator

Report Made Against	Investigation Group Members
Church Member, Volunteer or Participant	Three or more from Elders, Management Committee and/or Safe Ministry Contacts, including one woman.*
Elder or Management Committee Member	Three or more from Elders, Management Committee and/or Safe Ministry Contacts, including Senior Pastor and one woman.*
Senior Pastor or their family	An Advisory Council Member, two members of the Elders Council and one woman.*

\*The Elders may nominate another suitable woman if the Female Safe Ministry Contact is unavailable.

FIEC also has a complaints management committee. Failing a satisfactory resolution through these internal investigation steps, the complaint is to be referred to the FIEC.



## Investigate the Misconduct

### Investigation Group Members

The investigation Group members determine the steps to be taken to investigate the allegation or suspicion of harm.

The Investigation Group may refer to the National Office for Child Safety's Complaint Handling Guide: Upholding the rights of children and young people.

The accused should be given the opportunity to respond to the report in a fair way. Once an investigation has commenced, the Investigation Group must write to the accused, informing them of the nature of the report and members of the Investigation Group (in consultation with the Relevant Government Department and Police, if applicable). The timing of this letter may depend on the circumstances of the report. It will generally be inappropriate to inform the accused before an investigation commences, unless this is necessary to explain action to reduce a risk that affects them. Notification must not be delayed so as to:

- affect the ability of the accused to make representations about the nature of the report or the person appointed to investigate them,
- to deny the accused procedural fairness in the way the investigation is conducted, or
- to prevent the accused from receiving adequate support in relation to the allegations made against them.

The Investigation Group must prepare a written report of their investigation including their recommendations.

Person who is the subject of the investigation

Report & Recommendations prepared for Elders Council



During the investigation

### Pastoral Support and Care

The Investigation Group in consultation with the Elders should organise a support person for any children and families involved, the complainant and the accused. The support and pastoral care provided should be monitored by the Investigation Group to ensure it is adequate and ongoing.



### Actions following investigation

#### Investigation Group, in consultation with Elders Council

If the report **is substantiated**, the Investigation Group, in consultation with Elders Council, must decide on the appropriate action to take including any combination of:

- Remove the accused from the Child Worker Register;
- require the accused to cease to have any contact with children at Church other than unavoidable incidental contact;
- ask the accused to leave the Church;
- report the matter to relevant government authorities;
- inform Members of the Church about what has occurred;
- Suspend membership subject to outcome if any legal proceedings.

If the report is **not substantiated**, the Investigation Group, in consultation with Elders Council, including if the accused is an Approved Child Worker, reinstating them from being suspended;

#### COMMUNICATION FOLLOWING THE INVESTIGATION

As appropriate, the Senior Pastor, or Elder or a member of the investigation Group with Elders Council Approval, must

- write to:
  - o the parents or carers of the child;
  - o the complainant, if appropriate; and
  - o the accused; and
- inform the above parties of:
  - o the outcome of the investigation, while respecting the privacy the parties involved;
  - o the action the Investigation Group intends to take;
- include an offer to discuss the report.

Senior Pastor & Elders Council assesses and implements appropriate actions.

Child Worker Register updated if appropriate.

Parents/Carers of Child informed of outcome

Person subject to allegation informed of outcome and actions to be taken.



### Actions following investigation

#### Review of Outcome

If the complainant, the parents of the child affected, or the accused is dissatisfied with the result of the investigation, that person may write to the Secretary to request that the Elders Council carry out a review.

#### Review of Processes and Policies.

After an investigation, the Senior Pastor and Safe Ministry Contact should conduct an evaluation to identify learnings that might require an improvement in procedures, which should include assessing and implementing any recommendations of the Investigation Group as appropriate.



Return to Step 3



Communication and implementation of recommendations.

### 8.11. Breaches

Any reported breach of this Policy must be reported to the Senior Pastor. The Senior Pastor may seek counsel regarding the action to be taken.

If the Senior Pastor is of the view the breach is of a minor or insignificant nature the Senior Pastor may:

- 1) counsel, or ask another Staff Member to counsel, the person responsible for the breach;
- 2) take no further action.

If the Senior Pastor is of the view that the breach is not minor or insignificant the Senior Pastor should:

- 1) counsel, or ask another Staff Member to counsel, the person responsible for the breach;
- 2) consider whether the person should be removed from any current responsibilities for supervising or caring for children or, in consultation with an Elder, impose other consequence on the person, e.g., an Approved Child Worker who repeatedly breaches the Policy may be suspended or have their name removed from the Child Worker Register;
- 3) consider whether the breach suggests any deficiency in the current policies and implementation of those policies by Church, and if so, bring this concern to the attention of the Elders Council;
- 4) if 3) does not apply, and the matter does not concern the Senior Pastor, consider whether the matter is nevertheless of such seriousness that it should be brought to the attention of the Elders Council in any event.

### 8.12. Elders Council Involvement

- 1) The Elders Council must:
  - a) ensure that the report is, or has been, referred to the Relevant Government Department, unless the Elders Council forms the unanimous view that the report is frivolous or trivial, the report is obviously untrue, or the report concerns an Excluded Incident.
  - b) if the report does not include abuse or alleged abuse, determine whether to refer the report to the Police, taking advice from the Relevant Government Department.

## 9. Procedure – Risk Management Plan for High-Risk Activities & Special Events

Some activities involve higher risks to children. Special procedures apply to the holdings of activities of this kind. A high-risk activity or special event due to its nature will require extra planning and supervision.

Risk management involves identifying potential risks and taking steps to remove or minimise them via an effective risk management strategy plan.

Risk management plans for high-risk activities and special events must be written documents and developed in conjunction with your stakeholders. At a minimum, these plans must be reviewed annually.

### 9.1. Risk Management Process

A risk management plan for the activity needs to be created and approved by the Elders Council using the Risk Management Plan for High-Risk Activity Template.

The following is adapted from the Standards Australia's AS/NZS ISO 31000:2009 Risk management—Principles and guidelines.

There are six steps to consider in the development of an effective risk management plan:

- 1) Establish the Context (describe the activity)
- 2) Identify the Risks
- 3) Analyse the Risks
- 4) Evaluate the Risks
- 5) Manage the Risks and reassess, and
- 6) Review.

#### *Step 1 – Establish the Context (describe the activity)*

- 1) what is the activity and what are your objectives;
- 2) where is the activity going to take place – what environmental factors need to be considered;
- 3) identify the stakeholders, Staff, parents, and children and young people involved in the activity; and
- 4) identify all elements of the event from beginning to end.

#### *Step 2 – Identify the risks*

Consider involving a wide range of stakeholders, including children and young people, to identify the risks associated with the high-risk activity or special event.

Workplace health and safety processes consider environment and equipment risks. Once you have fulfilled the workplace health and safety requirements, you must assess the risks associated with the child risk management strategy. These risks are physical, emotional, sexual, and cultural in nature, including the risks from:

- a) other children or young people
- b) someone outside the organisation
- c) an employee or volunteer, and
- d) themselves.

In relation to potential risks of harm associated with the high-risk activities and special events your organisation provides to children and young people, ask yourself questions such as:

- 1) How might harm occur? E.g.,
  - a) Running an activity where children and young people are required to change clothes, where the change rooms are unsupervised and open to the public.
  - b) Paid employees or volunteers spending long periods alone with a child or young person.
  - c) A coach offering special private sessions to a child or young person.
- 2) Why might harm occur? E.g.,
  - a) Inadequate recruitment and selection practices of paid employees and volunteers
  - b) Incorrect instructions given to employees working with children or young people
  - c) Not providing training to employees and volunteers
  - d) Inadequate attention to cultural considerations
- 3) When might harm occur?
  - a) Inadequate adult supervision
  - b) A Staff Member giving a child a lift home

### *Step 3 – Analyse the risks*

The purpose of risk evaluation is to make decisions, based on the outcomes of risk analysis. The level of risk will determine whether the high-risk activity or special event is practical.

Consider:

- 1) How likely is it that the risk will occur? (Likelihood)
- 2) What would happen if the risk did occur? (Consequences)

### *Step 4 – Evaluate the risks*

The fourth step requires you to evaluate the level of risk, which will depend on your answers to the questions asked at Step 3. For example, if a risk is likely to occur and the consequences could result in major harm to a child, then this would be considered high risk.

- 1) Determine likelihood of the risk by using the left-hand column of the **Risk Analysis Matrix**
- 2) Use the impact information to determine the consequences level.
- 3) Combine the Consequences and Likelihood ratings to arrive at the **Risk Level** (i.e., Low, Medium, High, or Critical).

Risk Analysis Matrix



Likelihood	Insignificant	Minor	Moderate	Major	Extreme
Very likely Expected to occur in most circumstances	Medium	Medium	High	Critical	Critical
Likely Will probably occur in most circumstances	Low	Medium	High	High	Critical
Possible Might occur at some time	Low	Medium	Medium	High	High
Unlikely Not expected to occur	Low	Low	Medium	Medium	High
Rare Occurs in exceptional circumstances only	Low	Low	Low	Medium	Medium

#### Step 5 – Manage the risk

Standards Australia's "AS/NZS ISO 31000:2009 Risk management— Principles and guidelines" describes risk treatment as "a cyclical process of:

- assessing a risk treatment;
- deciding whether residual risk levels are tolerable;
- if not tolerable, generating a new risk treatment; and
- assessing the effectiveness of that treatment."

Risk management involves assessing the options available to reduce the risk and the preparation and implementation of risk management plans, e.g.:

- Reduce the risk – will the proposed additional controls reduce the risk?
- Retain the risk - some risks will have to be retained and will require close monitoring.

Risk management options should consider the values and perceptions of stakeholders and the most appropriate way to communicate with them.

You now should consider how likely it is for the risk to occur after control measures have been put in place, and how bad the outcome would be if the risk was to occur. If you assess that a risk is still highly likely to occur, and the outcome could result in harm to a child then you may need to rethink the activity.

#### Step 6 – Review

Ongoing review is essential to ensure that the risk management plan your organisation develops for your high-risk activity or special event is effective. Reviewing controls and responsibilities can be

useful for future planning. You should consider who will review the risk management plan after the event or activity.

Each stage of the risk management process should be recorded appropriately.

## 10. Links to Incident & Application Forms

[Child Worker Application Form](https://centenaryev.churchcenter.com/people/forms/591663) - [https://centenaryev.churchcenter.com/people/forms/591663]

[Incident Response Form](https://centenaryev.churchcenter.com/people/forms/591650) – [https://centenaryev.churchcenter.com/people/forms/591650]

## 11. Register of changes to this policy.

Jan 2025 Version:

- Page 8 - Replacement of Amanda Teo as Safe Ministry Contact, with details of new Safe ministry contact Ethel Wee.
- Addition of the definition (Section 1.6) for “**Reasonable grounds to suspect**”. Taken from ACNC Safeguarding template.
- Addition of the first clause in Section 5 “Responsibilities”. Taken from ACNC Safeguarding template.
- Fixed up a few typos (i.e. “treasure” not “treasurer” on page 24, “much” not “must” on page 15).
- Addition of Section 7.1 - Transition of Under 18 - Approved Child Worker to Approved Child Worker
- On page 25, Reporting Step 4;
  - Deletion of the clause – “\*For the initial period when there are less than three Elders, an Advisory Council Member or Management Committee Member is to join the investigation group.” This initial period has now ended.
  - Replaced the sentence “\*FIEC also has a complaints management committee. It may be prudent to utilise this investigation committee.” with “FIEC also has a complaints management committee. Failing a satisfactory resolution through these internal investigation steps, the complaint is to be referred to the FIEC. “