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AUSTRALIAN FELLOWSHIP OF
BIBLE-BELIEVING CHURCHES



AFBC

CHILD SAFE & VULNERABLE PEOPLE POLICY

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NSW - GOVERNANCE



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Our Commitment to Child Safety

We declare that the safety, physical protection, emotional wellbeing and spiritual discipleship of every child entrusted to our care is our highest priority. We are unwavering in our commitment to providing a secure, nurturing, and safe environments where children can grow in wisdom, stature, and favour with God and others. Guided by biblical wisdom, we hold ourselves to the highest standards of integrity, accountability, and vigilance.

Our Unwavering Promise to Protect God's Children

Our absolute theological and practical commitment to maintaining a safe, transparent, and nurturing environment is grounded in the teachings of Jesus Christ and aligned with child safe standards. These **8 core pillars** guide our leadership, staff, and volunteers in protecting the next generation.

- 1. Value of the Child:** We recognise that children are precious to God. They deserve an environment that welcomes, respects, and shields them from harm. Jesus said, *"Let the little children come to me, and do not hinder them, for the kingdom of heaven belongs to such as these"*. (**Matthew 19:14**).
- 2. Pledge of faithfulness:** We pledge to be faithful stewards of the next generation, creating a refuge where the little ones can safely encounter the love of Christ. *"We will not hide them from their children, Telling to the generation to come the praises of the Lord, And His strength and His wonderful works that He has done"*. (**Psalms 78:4**)
- 3. Zero Tolerance for Abuse:** We have absolute zero tolerance for child abuse or neglect. Any form of harm compromises the sanctuary of God's house and will be met with immediate legal and internal action. *"Learn to do good; Seek justice, Rebuke the oppressor; Defend the fatherless, Plead for the widow"*. (**Isaiah 1:17**)
- 4. Obedience to Governing Authorities:** We believe that child protection laws, including the **Children's Guardian Act 2019** and the **Child Safe Scheme**, are instruments of justice. We joyfully submit to these standards as part of our witness to the world. Scripture instructs us, *"Let everyone be subject to the governing authorities, for there is no authority except that which God has established"*. (Romans 13:1).
- 5. Rigorous Vetting and Compliance:** In line with legal mandates, every worker and volunteer must hold a current Working with Children Check (WWCC). We rigorously screen all adults before they step into ministry or recreational programs. *"Therefore submit yourselves to every ordinance of man for the Lord's sake, whether to the king as supreme, ¹⁴or to governors, as to those who are sent by him for the punishment of evildoers and for the praise of those who do good"*. (**1 Peter 2:13-14**)
- 6. Culture of Transparency:** We foster an open environment where children are listened to, their voices are valued, and families feel safe to raise concerns. *"But he who does the truth comes to the light, that his deeds may be clearly seen, that they have been done in God"*. (**John 3:21**)
- 7. Continuous Improvement:** We actively train our leaders, staff, and volunteers to recognise, prevent, and report risks, ensuring our policies strictly align with the Child Safe Standards. *"A wise man will hear and increase learning, and a man of understanding will attain wise counsel"*. (**Proverbs 1:5**)
- 8. Honouring God in All We Do:** Everything we establish is designed to reflect the character of our Creator. By upholding these standards, we ensure our ministry remains pure, accountable, and holy. *"So whether you eat or drink or whatever you do, do it all for the glory of God"*. (**1 Corinthians 10:31**)



AFBC Associated Church's Declaration to Safe Ministry:

As the associated church governing body, your church **[CHURCH NAME]** elders/diaconate body or pastoral leadership team holds ultimate legal and spiritual responsibility. Your Church **[CHURCH NAME]** policy suite must specifically dictate that the governing body will:

1. **Appoint a Child Safe/Ministry Officer:** Designate a specific, trained individual (or committee) to oversee daily compliance, separate from the pastoral team.
2. **Enforce Mandatory Training:** Ensure *all* leaders, volunteers, and the governing board members themselves undergo regular, documented safe ministry training.
3. **Maintain Secure Records:** Establish clear retention schedules for screening logs, incident reports, and attendance records (often required to be kept for decades for legal compliance).
4. **Conduct Annual Audits:** Review the church's incident logs and compliance data at least once a year, updating policies to match changing local legislation.

Purpose:

The purpose of this policy is to define the collective and individual obligations of local churches operating within the AFBC association. It ensures that while local churches maintain operational autonomy, they will align within the AFBC unified standards to prevent child abuse, satisfy statutory regulations, and maintain uniform accountability across the entire association.

Application:

This policy applies to **all local churches, branch campuses, and affiliated ministries** holding membership within the church association. It must be adopted formally by each local church's church council, session, or leadership body.

Scope:

This policy governs all operations of member churches, including:

- Local leadership teams, Eldership, Diaconate, pastors and administrative staff.
- All locally run children's, youth, family, and community ministries.
- Any joint association initiatives, combined youth camps, regional conferences, and shared digital platforms.

Safe Ministry Policy:

(a.) Governance and Alignment Obligations

- **Local Policy Adoption:** Every member church must formally adopt a localized version of the association's approved Child Safe Framework, modifying only local contact details and specific staff structures.
- **Appointing a Child Safe/Ministry Officer Contact:** Each church must appoint a qualified local Child Safe/Ministry Officer to act as the primary liaison between the local congregation and the association's central safeguarding team.

(b.) Screening and Verification Obligations

- **Mandatory Background Checks:** Local churches are strictly obliged to ensure that 100% of workers (paid and volunteer) hold a valid, verified state clearance (such as a [Working with Children Check \(WWCC\)](#) in NSW).
- **The "Six-Month Rule":** Churches must enforce the association standard requiring individuals to regularly attend a member church for at least six months before being considered for a child-related volunteer role.



(c.) Training and Competency Obligations

- **Approved Induction:** No staff member or volunteer may commence ministry to minors until they complete the association's approved foundational child safety training module.
- **Refresher Requirements:** Local leadership must ensure all active youth and children's workers undergo mandatory refresher training every three years (or as dictated by association updates).
- **Board Competency:** Members of the local church governing body must complete specific governance-level safeguarding training within six months of taking office.

(d.) Incident Escalation and Reporting Obligations

- **Dual Reporting Lines:** In addition to making immediate, legally mandated reports to secular authorities (such as the police and child protection agencies), local churches are strictly obliged to notify the association's Child Safe Relations officer within 24 hours of any child abuse allegation or disclosure regarding a church offence in the reportable conduct scheme.
- **Surrender of Investigation:** Local churches must not attempt to investigate allegations against elders, deacons, pastors or staff internally. They must immediately stand down the accused person and hand over the matter to the association's professional standards unit or an independent external investigator.

(e.) Auditing and Quality Assurance Obligations

- **Annual Self-Audits:** Local church bodies must complete and submit an annual child safety compliance audit checklist to the association executive.
- **Annual Audits:** Review the church's incident logs and compliance data at least once a year, updating policies to match changing local legislation.



Part 1: Child Safety Policy

This Child Safe Policy outlines the key elements of approach to child protection adopted by Australian Fellowship of Bible-Believing Churches (**AFBC**) as a child safe organisation. AFBC and its leadership are committed to promoting child safety and the wellbeing of all children and young people entrusted to our care. This Child Safe Policy has been reviewed by the directors/elders of AFBC who support this commitment.

(1.1) Purpose:

The purpose of this Child Safety Policy is to demonstrate our organisation's zero-tolerance stance towards child abuse and exploitation. It articulates our commitment to upholding the safety, wellbeing, and empowerment of all children and young people who engage with our services, programs and events. Specifically, this policy aims to:

- **Prevent Harm:** Proactively identify, assess, and manage risks of harm to children in both physical and online environments.
- **Define Responsibilities:** Equip all leaders, staff, and volunteers with the knowledge, skills, and boundaries required to interact appropriately with children.
- **Establish Reporting Mechanisms:** Provide clear, accessible, and child-focused procedures for responding to and reporting concerns, disclosures, or allegations of child abuse.
- **Ensure Compliance:** Outline the organisation's strategy to meet NSW state/territory child protection legislation and the National Principles for Child Safe Organisations.

(1.2) Application:

This policy applies to **all levels of leadership and ministry operations** across **[Church Name]**. It must be formally endorsed by the Church Governing Body and must be actively implemented by all elders, deacons, pastoral staff, ministry leaders, employees, and volunteers. Compliance with this policy is a non-negotiable condition of employment and volunteer service.

(1.3) Scope:

This policy applies to everyone who conducts work for, or on behalf of, the church in a paid or unpaid capacity.

Who it applies to:

- Board members and executive leadership (Elders, Deacons & Pastors)
- Employees and staff members
- Volunteers, interns, and trainees
- Contractors, consultants, and external education/service providers
- Student leaders

**What it applies to:**

- All activities, events, and programs delivered by the church that involve, result in, or relate to contact with children and young people.
- Interactions occurring in person at our physical premises, off-site locations, and during travel.
- Online environments, including social media, virtual meetings, messaging platforms, and digital programs.
- Any conduct outside of work/church hours that could compromise the safety of children, particularly regarding individuals in child-related roles.



Part 2 : Commitment to Child Safety

We want all children and young people who attend churches withing the AFBC & **[Church Name]** to feel and be safe. We are committed to providing a child safe and child friendly environment, where children and young people are safe and feel safe and are aware of decisions that affect their lives. We have zero tolerance for child abuse and are committed to doing what we can to keeping children at **[Church Name]** safe from harm.

[Church Name] regards its child safeguarding responsibilities with the utmost importance and is committed to providing the resources required to ensure compliance with all relevant child protection laws and regulations.

Each member of **[Church Name]** Kids and youth ministries has a responsibility to understand the importance and specific role that they play individually and collectively to ensure the wellbeing and safety of children. To this end, regular training related to child safety is provided to all who are involved in ministry to children.

Key responsibilities of those ministering to children at **[Church Name] include:**

- Meeting Child Safe Standards
- Recognising and reporting where children may be at Risk of Significant Harm
- Recognising and reporting where workers engage in reportable conduct or other inappropriate behaviour.
- Recognising and reporting where children engage in concerning or harmful sexual behaviour.
- Maintaining an up to date working with children's check clearance
- Participating in training as required by AFBC and the church pastors and elders
- Educating and involving children in the learning process
- Involving and informing families and the community around the importance of children's safety
- Understanding and managing risks to child safety
- Compliance, Monitoring, and Working with the **[Church Name]** Children's ministry team in pursuing a culture of continuous improvement on Child Safety

(2.1) Scope:

This Child Safe Policy applies to all leaders, helpers, paid staff, and volunteers ministering to children under the **[Church Name]** Children's Ministry. Likewise, this Child Safe Policy applies to all ministry-related activities and events under the **[Church Name]** Children's Ministry whether they are held on-site or off-site.



Part 3: Child Safe Standards Policy:

Our Statement to Child Safety

Here at AFBC, we hold a sacred and legal trust to protect, nurture, and cherish every child in our care. Our commitment is anchored in the Word of God, guided by our spiritual duty to the vulnerable and our civic duty to the law.

By embedding these **10 standards** into the fabric of our culture, we stand firm as a sanctuary of safety. We ensure that our actions match our faith, proving to families, authorities, and the community that the safety of our children is our sacred bond.

(3.1) Purpose:

The purpose of this policy is to formalize **[Church Name]**'s holistic implementation of the **National Principles for Child Safe Organisations** (and corresponding state-based Child Safe Standards). This policy shifts child safeguarding from a basic compliance checklist into an organizational culture, embedding continuous safety, active child participation, and systemic risk reduction into every aspect of church governance and ministry.

To establish a framework that embeds a child-safe culture, prevents harm, and outlines how our organization meets its obligations under the **Children's Guardian Act 2019** (NSW).

(3.2) Application:

This policy must be actively applied by the Church Governing Body, Senior Ministry Leaders, and the Child Safe/Ministry Officer to audit, guide, and oversee all operational choices. Every department—including worship, kids' church, youth ministry, administration, and finance—is required to integrate these standards into their daily practices and strategic planning.

(3.3) Scope:

This policy applies to all directors, elders, deacons, pastors, executive leaders, paid staff, volunteers, contractors, and student leaders, across all physical and online environments. This policy governs the entire ecosystem of **[Church Name]**, specifically encompassing:

- **Personnel:** All ordained pastors, elders, church council members, staff, interns, volunteers, and independent contractors.
- **Physical & Digital Environments:** All properties, campuses, rented venues, off-site camps, mission excursions, online livestreams, official social media accounts, and youth group messaging applications.
- **Organizational Practices:** Recruitment, training, incident management, risk planning, community communications, and strategic resource allocation.



(3.4) Policy About the Child Safe Standards:

The Child Safe Scheme is built on **10 Child Safe Standards**. These standards are principle-based and are designed to keep children safe by creating Organisations/Churches that help prevent, detect and respond more effectively to harm and abuse, if it occurs.

Applying the Child Safe Standards means that the best interests of children are always at the forefront, child abuse is never tolerated, and every child's rights are respected. Concerns about child safety are taken seriously, and everyone is empowered to report abuse without obstruction. Applying the Standards also ensures we as a church are complying with the legal obligations of the **Child Safe Scheme**.

(3.5) Child Safe Policy Alignment with the 10 NSW Child Safe Standards:

This Child Safe Policy has been developed through the **National Principles of Child Safe Organisations** developed by the National Office for Child Safety and the NSW Child Safe Standards recommended by the Royal Commission into Institutional Response to Child Sexual Abuse as articulated by the Office of Children's Guardian (OCG). These principles include:

(3.6) Child Safe Standards Procedure:

Standard 1: Child safety is embedded in organisational leadership, governance and culture.

Obedience to Governing Authorities: Scripture instructs us, *"Let everyone be subject to the governing authorities, for there is no authority except that which God has established"* (**Romans 13:1**). We believe that child protection laws, including the [Children's Guardian Act 2019](#) and the [Child Safe Scheme](#), are instruments of justice. We joyfully submit to these standards as part of our witness to the world.

Biblical Framework: God establishes earthly governance to maintain justice and protect the vulnerable. For a church to lead with integrity, it must walk in obedience to legal safety frameworks, viewing civil compliance not as a burden, but as a direct expression of Christian stewardship and moral accountability.

- Our leadership team models, promotes, and rewards a proactive child-safe culture.
- Child safety is a standing item on governance agendas, and risks are formally reviewed at leadership levels.
- A dedicated **Child Safety/Ministry Officer** is appointed to oversee compliance and policy updates.



Standard 2: Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

The Value of the Child: Jesus said, *"Let the little children come to me, and do not hinder them, for the kingdom of heaven belongs to such as these"* (**Matthew 19:14**). We recognise that children are precious to God. They deserve an environment that welcomes, respects, and shields them from harm. Hindering a child's safety hinders their ability to thrive in God's kingdom.

Biblical Framework: Children are not secondary members of God's kingdom; they are its very pattern. A child-safe culture does not just tolerate children but actively values, listens to, and supports them. We must build an environment where children are seen as a divine heritage from the Lord and where their voices are heard and respected in accordance with the biblical family model.

- We communicate with children in age-appropriate, accessible ways regarding their rights and how they should expect adults to behave.
- We provide clear, child-friendly feedback mechanisms to capture their views on program safety and design.

Standard 3: Families and communities are informed and involved in promoting child safety and wellbeing.

The Safety of the family Community: Protection is a collaborative effort of the entire body of believers. *"Two are better than one... If either of them falls down, one can help the other up"* (**Ecclesiastes 4:9-10**). By involving the wider community, we build a robust, transparent defence system around our children.

Biblical Framework: God designed children to thrive within a protective network of family and community. Safety is not achieved in isolation, but through open communication, shared responsibility, and mutual accountability we can help build up and protect the children in our churches.

- We maintain open, transparent partnerships with families regarding our safety policies and codes of conduct.
- Parents and carers have ready access to information about how to raise concerns or provide feedback.



Standard 4: Equity is upheld and diverse needs respected in policy and practice.

No Partiality or Discrimination: God does not show favoritism, and neither must we. *"For God does not show favoritism"* (Romans 2:11). In our safety measures, there is no room for partiality. We must actively defend children who face systemic barriers or increased vulnerability.

Biblical Framework: God created every individual with unique worth, and Christ broke down the barriers that divide humanity. True safety means ensuring that every child—regardless of their background, ability, or culture is equally protected, valued, and given the specific support they need to thrive.

- We recognize and actively support the safety needs of Aboriginal and Torres Strait Islander children, children from culturally diverse backgrounds, youth, and children with disabilities.
- Our programs are adapted to reduce barriers and protect children who experience heightened vulnerability.

Standard 5: People working with children are suitable and supported to reflect child safety values.

Rigorous Vetting and Above Reproach Assessment: Leadership requires proven integrity, not just good intentions. Scripture warns against rushing people into ministry without careful examination. *"Do not be hasty in the laying on of hands, and do not share in the sins of others. Keep yourself pure"* (1 Timothy 5:22). Vetting staff and volunteers through Working With Children Checks (WWCC) and references is a practical outworking of this biblical wisdom.

Biblical Framework: The spiritual and physical safety of children relies directly on the character, integrity, and preparation of the adults who lead them. God requires that those entrusted with care are thoroughly vetted for maturity, equipped for service, and held to the highest standards of accountability as above reproach.

- Strict screening protocols are mandatory, including verified **Working with Children Checks (WWCC)** and thorough reference checks.
- All staff and volunteers sign our **Child Safe Code of Conduct**, which clearly defines acceptable and unacceptable boundaries.



Standard 6: Processes for complaints and concerns are child focused.

Swift and Uncompromising Justice: God hears the cries of the oppressed and demands immediate intervention. *"Learn to do right; seek justice. Defend the oppressed. Take up the cause of the fatherless..." (Isaiah 1:17).* A child-focused process prioritises the safety and well-being of the child. Dealing and responding with allegations swiftly and transparently, cooperating fully with legal authorities immediately while conducting the process with professional support, and pastorally care around the child and their family.

Biblical Framework: When a child cries out for help, or when harm is suspected, our response must mirror the absolute justice, swift protection, and tender compassion of God. A child-focused complaint process ensures that the victim is believed, protected, and healed, while misconduct is brought into the light without hesitation or cover-up.

- We maintain a clear, non-obstructive reporting pathway for handling allegations of harm, abuse, or grooming.
- Complaints are handled transparently, confidentially, and with the immediate safety of the child as the priority.

Standard 7: Staff and volunteers are equipped with the knowledge, skills and awareness to keep children safe through ongoing education and training.

The Command to Grow in Knowledge: Scripture explicitly warns against the dangers of operating without proper understanding. *"Desire without knowledge is not good—how much more will hasty feet miss the way!" (Proverbs 19:2).* Continual safety training gives our leaders, staff, and volunteers the precise knowledge needed to guide their feet safely and avoid critical errors in care.

Biblical Framework: Godly stewardship requires competence, not just good intentions. To keep children safe, our leaders, staff, and volunteers must grow continuously in wisdom, alertness, and practical skills. Dedicating time to ongoing child safety education ensures we are never caught off guard by the tactics of harm.

- Mandatory child safety induction is required for all new personnel.
- Regular, ongoing training is provided to help staff identify early indicators of abuse, neglect, and grooming behaviours.



Standard 8: Physical and online environments promote safety and wellbeing while minimising the opportunity for children to be harmed.

Designing Physical Spaces for Safety: Scripture reveals that physical construction must include safety features to prevent foreseeable harm. *"When you build a new house, make a parapet around your roof so that you may not bring the guilt of bloodshed on your house if someone falls from the roof"* (**Deuteronomy 22:8**). In ministry context, this means designing open, highly visible ministry spaces and line-of-sight environments to protect children from isolated contact with adults.

Guarding the Gates of the Digital World: Just as physical walls protect a city, we must secure our online environments from predators. *"Like a city whose walls are broken through is a person who lacks self-control"* (**Proverbs 25:28**). As children increasingly interact online, we must establish strong digital walls—such as monitored group chats and strict social media policies—to keep our online ministries secure and above reproach.

Biblical Framework: Godly stewardship requires us to intentionally design, monitor, and secure the spaces where we gather. Whether in a physical building or a digital landscape, we must actively eliminate hidden corners, set clear boundaries, and build a perimeter of safety that removes any opportunity for harm to take root.

- Comprehensive risk assessments are executed for all facilities, excursions, digital communication tools, and online programs.
- We strictly enforce a **"no one-on-one unsupervised contact"** rule in both physical and digital settings.

Standard 9: Implementation of the Child Safe Standards is regularly reviewed and improved.

The Pursuit of Excellence and Growth: Our standard of care should constantly improve as we learn and mature. *"And this is my prayer: that your love may abound more and more in knowledge and depth of insight"* (**Philippians 1:9**). Continuous improvement ensures our safety practices grow more sophisticated, dynamic, and effective in protecting the next generation.

Biblical Framework: Complacency is the enemy of safety. A truly child-safe organisation never assumes its work is finished. God calls us to a lifestyle of continuous examination, correction, and growth, ensuring that our protection frameworks adapt to new challenges and remain steadfast over time.

- This policy is reviewed **annually** or immediately following any critical child-safety incident.
- Feedback from reviews, complaints analysis, and child/family consultations are used to continuously improve our systems.



Standard 10: Policies and procedures document how the organisation is safe for children and young people.

The Blueprint of Order and Accountability: God instructs His leaders to record instructions clearly so that anyone can understand and act upon them immediately. *"But everything should be done in a fitting and orderly way" (1 Corinthians 14:40).* Documenting our safety protocols ensures that our commitments are formal, structured, and legally binding—not left to human error or changing leadership. Written child-safe policies make our safety standards plain and actionable for every leader, parent, and volunteer.

Biblical Framework: God is a God of order, clarity, and truth. He does not leave the protection of the vulnerable to memory or good intentions. Throughout history, He commanded that laws, boundaries, and covenants be clearly written down so that all people could read them, follow them, and remain accountable across generations.

- This policy, alongside our reporting procedures, information-sharing policies, and Code of Conduct, forms an integrated safety ecosystem.
- Records of child safety training, WWCC verifications, and incident responses are securely logged and handled in compliance with privacy laws.



Part 4: Child Safe Code of Conduct Policy:

(4.1) Purpose:

The purpose of this Code of Conduct is to provide clear guidance to all directors, pastors, elders, deacons, paid employees, volunteers, contractors, and students leaders. (collectively referred to as Personnel) on how to interact safely and appropriately with children and young people. It supports our commitment to creating a safe, respectful, and inclusive environment.

(4.2) Application:

Compliance with this Code is a condition of engagement. Any breach may result in disciplinary action, up to termination of employment or engagement, and reporting to relevant statutory authorities, including the **NSW Police** and the **Office of the Children's Guardian**.

(4.3) Scope:

This Code applies to directors, pastors, elders, deacons, paid employees, volunteers, contractors, and students leaders. (collectively referred to as Personnel)

(4.4) Our Commitment:

We will:

- Prioritise the safety, wellbeing, and rights of children at all times.
- Treat all children with dignity, respect, and fairness.
- Actively listen to children and take their concerns seriously.
- Follow all organisational policies and legal obligations regarding child safety.

(4.5) Acceptable Behaviours:

All Personnel must uphold a child-safe culture by ensuring that interactions with children are respectful, safe, and transparent. You must:

- **Treat Everyone with Dignity:** Treat all children and young people with respect, fairness, and equity, regardless of their age, gender, race, culture, vulnerability, or ability.
- **Prioritise Safety:** Put the safety and wellbeing of children above all other considerations.
- **Maintain Transparency:** Ensure that, wherever practical, interactions with children occur in open or visible spaces where you can be seen by other adults.
- **Enforce the "Two-Adult" Rule:** Avoid situations where you are completely alone with a child. Ensure another adult is present or within sight and hearing distance.
- **Listen and Empower:** Take children seriously. Actively listen to their concerns, encourage their participation in decisions that affect them, and respect their privacy boundaries.
- **Report Suspected Harm:** Report any child safety concerns, disclosures, or breaches of this Code immediately to the designated **Child Safety/Ministry Officer (Or Senior Pastor)**, in line with our reporting procedures.
- **Follow Professional Boundaries:** Communicate professionally, using tone, language, and topics that are age-appropriate and relevant to the church programs.
- **Use Approved Digital Channels:** Communicate with children online only through official church accounts and platforms, ensuring management has visibility over these channels.



(4.6) Unacceptable Behaviours:

To ensure the physical, emotional, and psychological safety of children, Personnel must not:

- **Engage in Abuse:** Engage in any form of physical, sexual, emotional, or psychological abuse, or neglect of a child.
- **Develop Favouritism:** Treat a child preferentially, give targeted gifts, or develop exclusive, special relationships with a child (to prevent grooming behaviours).
- **Initiate Unnecessary Physical Contact:** Touch a child inappropriately. Physical contact must be strictly limited to what is culturally appropriate, age-appropriate, and necessary for the activity (e.g., first aid, safety spot in sports).
- **Transport Children Privately:** Drive a child in your private vehicle without the explicit, documented permission of both management and the child's parent or carer.
- **Meet Independently Outside Church:** Arrange to meet a child outside of official church programs, events, or environments.
- **Provide Private Accommodation:** Spend the night alone in a room with a child during camps, trips, or excursions, unless in an extreme emergency.
- **Connect via Personal Social Media:** Connect with, follow, or direct-message children via personal social media accounts, phone numbers, or gaming platforms.
- **Take Unauthorised Photos:** Take photos or videos of children on personal devices. All media must be captured on organizational devices with explicit, written parental consent.
- **Use Harmful Language:** Shout at, humiliate, mock, or use sexually explicit, degrading, or racially offensive language around or directed at a child.
- **Ignore Disclosures:** Ignore, downplay, or fail to report an allegation, disclosure, or suspicion of child abuse or harm.

(4.7) Reporting Obligations:

Any breaches of this Code, suspected harm, or unsafe behaviour must be reported to:

- **[Designated Child Safety/Ministry Officer Name & Contact]**
- In emergencies, contact police or child protection services immediately.



Part 5: Safe Recruitment and Appointment

(5.1) Purpose:

The purpose of this policy is to ensure that the church governing body exercises its duty of care to protect children, youth, and vulnerable people from harm. It establishes a rigorous, standardized, and legally compliant process to deter, detect, and screen out individuals who are unsuitable to work or volunteer in ministry roles.

(5.2) Application:

This policy must be applied consistently by the **Church Governing Body, Ministry Leaders, and Child Safe/Ministry Officer** prior to appointing any person to a role. No individual may begin working, volunteering, or ministering in a child-related environment until every applicable stage of this policy has been fully executed, verified, and legally cleared.

(5.3) Scope:

This policy applies to all recruitment, selection, and appointment processes within the church. This includes:

- **Paid Roles:** Pastors, ministry directors, administrative staff, and contractors.
- **Volunteer Roles:** Sunday School teachers, youth leaders, creche helpers, morning tea servers, and church board/committee members.
- **Internal Transfers:** Existing volunteers or staff moving into new roles that involve children or vulnerable people.

(5.4) Policy:

(a.) Pre-Recruitment and Role Definition

- **Clear Role Descriptions:** Every position (paid or volunteer) must have a written role description that clearly outlines the duties, the level of contact with children, and the safety requirements.
- **Commitment Statement:** All job advertisements, volunteer signup forms, and information packages must include the church's formal Statement of Commitment to Child Safety.

(b.) Mandatory Screening and Background Checks

- **Identity Verification:** Candidates must provide government-issued photo identification to verify their identity before appointment.
- **Statutory Checks:** Anyone undertaking child-related work must hold a valid, verified state background check (such as a **Working with Children Check (WWCC)** in NSW) before starting their role.
- **Verification Database:** The church administration must independently verify the validity of these checks online and log the expiry dates in a central, secure database.
- **Police Checks:** National Criminal History Checks are required for roles involving financial oversight, governance, pastoral/elder leadership and paid staff/oversight of ministries.



(c.) Interviewing and Reference Checks

- **Above Reproach Interviews:** Shortlisted applicants for face-to-face ministry roles must undergo an Above Reproach interview that includes specific questions evaluating their attitudes toward child safety, boundaries, and safeguarding.
- **Mandatory References:** A minimum of two reference checks must be conducted and documented for all child-related roles.
- **Specific Inquiry:** Referees must be asked directly whether they have any concerns regarding the applicant's suitability to work with children or vulnerable people.

(d.) Appointment, Induction, and Probation

- **Written Agreement:** Successful applicants must sign a written agreement or letter of appointment confirming they read, understood, and agreed to abide by the **Child Safe Code of Conduct**.
- **Mandatory Training:** New staff and volunteers must complete the AFBC/church's approved Child Safe Ministry / Child Protection training within their first month, or prior to commencing unsupervised ministry.
- **Probationary Monitoring:** All new appointments are subject to a probationary period (typically 3 to 6 months for staff, or 1 term for volunteers) where their conduct and compliance with safety boundaries are actively monitored by their supervisor.

(e.) Record Keeping and Privacy

- **Secure Storage:** All recruitment documentation, including interview notes, reference checks, and verified check numbers, must be stored securely to protect applicant privacy.
- **Retention Compliance:** Records relating to child safety screening must be retained securely in accordance with statutory requirements and denominational guidelines.



Part 6: Screening Staff and Volunteers: Working with Children's Check

The Child Protection (Working with Children) Act 2012 (NSW) (the Act) and the Child Protection (Working with Children) regulation 2013 (NSW) aim to protect children and young people from harm by providing national criminal history check and a review of reported workplace misconduct findings within NSW for people wishing to do paid, unpaid, or volunteer child-related work in NSW.

These background checks are referred to as Working with Children Checks (WWCCs). The Act requires any worker who engaged in child related work to have WWCC clearance. **[Church Name]** requires all workers in Children's Ministries 18 years old and above to have WWCC clearance as all workers have the potential to have either direct access to the children or/and access to confidential information related to children.

(6.1) Purpose:

The purpose of this policy is to ensure that **[Church Name]** maintains a child-safe environment by preventing barred or inappropriate individuals from engaging in child-related ministry. This policy establishes mandatory procedures for obtaining, verifying, and continuously monitoring the Working with Children Check (WWCC) status of all personnel. It ensures absolute compliance with the *Child Protection (Working with Children) Act 2012 (NSW)*.

(6.2) Scope:

This policy applies to every individual who performs "child-related work" or holds a role where contact with children is a standard part of their duties at **[Church Name]**.

This includes:

- **All Ministry Pastors & Staff:** Senior pastors, assistant pastors, youth/children's ministers, and directors.
- **Child-Related Volunteers:** Sunday school teachers, youth group leaders, crèche workers, SRE, Program leaders and holiday camp leaders.
- **Supervisory Roles:** Church elders, deacons, church council members, and the Child Safety/Ministry Officer.
- **Exemptions:** In strict accordance with NSW law, youth volunteers who are themselves **under the age of 18** are exempt from holding a WWCC, but must still operate under direct adult supervision and sign the under 18's above reproach form.



(6.3) Policy Statement:

Mandatory Clearance Prior to Commencement

- **No Check, No Start:** No employee, minister, or volunteer may commence any child-related work or ministry role until they have provided a valid WWCC number and expiry date to the church.
- **Employer Verification is Compulsory:** It is a criminal offence to accept a WWCC number without verifying it. The **[Child Safe/Ministry Officer / Church Administrator]** must log into the OCG online portal to verify the check *before* the person begins their role.
- **Application Status:** The church may permit an individual with an "Application" status (APP number) to begin volunteering only under the strict, constant supervision of a fully cleared adult, pending final OCG approval.

(a.) Continuous Monitoring and Compliance

- **Verifications Register:** The church will maintain a secure, centralized **WWCC Verification Register**. This register documents each person's full name, date of birth, WWCC number, expiry date, verification date, and verification outcome.
- **Interim Bars and Cleared Status Changes:** The OCG continuously monitors all check holders. If the church receives notification that a worker's status has changed to "Interim Barred," "Barred," or "Closed," that individual will be **instantly removed** from all ministry duties and church premises.
- **Renewal Obligations:** WWCC clearances expire after **5 years**. Individuals are solely responsible for renewing their check before it expires. The church will audit the register quarterly and automatically stand down anyone whose check lapses.
- **Consequences of Non-Compliance:** Any individual who refuses to provide a WWCC, fails to renew their clearance, or is barred by the OCG will be permanently disqualified from child-related ministry at **[Church Name]**.

(b.) Responsibilities of Leaders, Volunteers, and Workers

All workers/leaders/volunteers are required to:

- Hold and maintain a valid working with Children's Check clearance from the OCG.
- Not engage in children-related work at any time that they are subjected to an interim bar or a bar.
- Report to the Child Safety/Protection Officer (Or Senior Pastor) if they are no longer eligible for a WWCC clearance, the status of their WWCC clearance changes or are notified by the OCG that they are subjected to a risk assessment; and
- Notify the OCG of any change to their personal details within 3 months of the change occurring.



(c.) [Church Name] responsibilities

It is an offence for a worker, volunteer, and leader to engage in child-related work when they do not hold a WWCC clearance or if they are subject to a bar.

It is the responsibility of [Church Name]:

- To undertake an online verification process prior to the engagement of any worker to confirm that they hold a current WWCC clearance and are not barred from working with children. For employees, the online verification print out is to be sent to the Child Safety/Protection Officer (Or Senior Pastor).
- Verify that workers have renewed their WWCC clearance prior to expiry.
- Exclude any worker who does not hold a current WWCC clearance from Child Related Work.
- Notify the Office of the Children's Guardian if a worker (including an employee, leader or volunteer) is subject to an adverse finding in relation to an allegation of misconduct, the subject of Mandatory Reporting and/or reportable conduct notification. This notification will trigger a risk assessment by the Children's Guardian and a review of the individual's WWCC clearance.



Part 7: Mandatory Reporting – Child Protection / Risk Of Harm Policy:

(7.1) Reporting Requirements.

All Leaders and Volunteers should immediately report to the Children's Ministry Director / Youth Ministry Director or designated Child Safety Officer (Or Senior Pastor) if they have reasonable ground to suspect that a child is at risk of significant harm (ROSH), or they have any other wellbeing concerns regarding a child. Child Protection Officer must inform the Senior Pastor of any report as soon as possible within the 7 days.

Leaders and Volunteers are not required to and must not undertake any investigation of the matter.

The Child Protection Team consist of:

POSITION	NAME
Senior Pastor	
Youth Ministry Director	
Children's Ministry Director	
Administration / Child Safety/Ministry Officer	

Reporting Requirements Policy

(7.2) Purpose:

The purpose of this policy is to ensure that **[Church Name]** acts swiftly, transparently, and legally to protect children from harm. In accordance with Christian values and NSW legislation, our church maintains a zero-tolerance stance toward child abuse. This policy ensures all allegations, suspicions, and disclosures of harm are handled with utmost seriousness, integrity, and strict confidentiality.

(7.3) Scope:

This policy applies to all aspects of church life, including Sunday services, Sunday School, youth groups, creche, community outreach programs, camps, and music ministries. All Leaders and Volunteers over 18 are mandatory reporters under the Child and Young persons (Care and Protection) Act and some other workers may also qualify as mandatory reporters under the Act. Mandatory Reporters are legally required to make a report if they have reasonable grounds to suspect a child (under the age of 16 years) is at risk of significant harm. It binds:

- The Senior Minister / Pastor and Pastoral Staff
- The Church Board / Directors / Elders
- Child Safety/Protection Officer
- All Ministry Leaders and Coordinators
- All church volunteers (including sound techs, catering, and welcoming teams)



(7.4) Types of Reportable Risk of Harm

Church personnel must remain vigilant and report any concerns regarding the following five categories of harm to a child (under 18 years of age):

1. Physical Abuse: Inflicting physical injury or failing to prevent physical injury.
2. Sexual Abuse: Engaging in sexual activity, grooming behaviours, or exposure to inappropriate content.
3. Emotional or Psychological Abuse: Chronic verbal harassment, rejection, or exposure to domestic and family violence in the home or church community.
4. Neglect: Chronic failure to provide basic physical needs (food, clothing, shelter) or medical care.
5. Reportable Conduct by Church Personnel: Any allegation of sexual misconduct, physical assault, ill-treatment, neglect, or psychological harm committed by a pastor, staff member, or church volunteer.

(7.5) Reporting Obligations

(a.) Risk of Significant Risk of Harm

A child or young person is 'at risk of significant harm' if current concerns exist for the safety, welfare or well-being of the child or young person because of the presence, to a significant extent, of any one or more of the following circumstances.

- The child's or young person's basic physical or psychological needs are not being met or are at risk of not being met.
- The parents or other caregivers have not arranged and are unable or unwilling to arrange for the child or young person to receive necessary medical care.
- If education is being blocked and the child has given strong indication that they are not receiving an education
- The child or young person has been, or is at risk of being, physically or sexually abused or ill-treated.
- The child or young person is living in a household where there have been incidents of domestic violence, and consequently, the child or young person is at risk of serious physical or psychological harm.
- A parents or other caregiver 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.
- The child was the subject of a pre-natal report under section 25 of the Children's and Young person's (Care and Protection Act) 1998 (NSW) and the birth mother of the child did not engage successfully with support services to eliminate, or minimise to the lowest level reasonably practical, the risk factors that gave rise to the report.
- And any other circumstances that could pose significant harm to a child

What is meant by 'significant' in the phrase 'to a significant extent', is that which is sufficiently serious to warrant a response by a statutory authority irrespective of a family's consent.

What is significant, is not minor or trivial and may reasonably be expected to produce a substantial and demonstrably adverse impact on the child's or young person's safety, welfare, or well-being. The significance can result from a single act or omission or an accumulation of these.



(b.) Young Person Wellbeing concerns

Leaders and Volunteers may have a wellbeing concern for attendee that does not meet the threshold of risk of significant harm or where the attendee is not a child or young person. Any concerns must still be reported to the Child Safety/Ministry Officer (Or Senior Pastor) to enable:

- Assessment of concerns in conjunction with other information of which the Pastor or Child Protections Officer may be aware and
- Determining whether **[Church Name]** should take action to support and protect the wellbeing of the attendee regardless of whether the risk of significant harm threshold has been met.

(c.) Confidentiality and Record Keeping

Leaders and Volunteers are required to deal with all reports regarding the safety, welfare or wellbeing of a child confidentially and only disclose it to the Child Safety/Ministry Officer (Or Senior Pastor) and, if required the DCJ or Police.

- All allegations of reportable conduct will be dealt with as confidentially as possible.
- Leaders and Volunteers are not permitted to inform the parents or caregivers that a report to the DCJ has been made. Any reports made by leaders and volunteers in regard to reportable conduct or inappropriate behaviour must not be discussed with any other person outside the people nominated by the Pastor.
- **[Church Name]** requires that all parties maintain confidentiality during any investigation of reportable conduct including relation to the handling and storing of documents and records.
- The Child Safety/Ministry Officer (Or Senior Pastor) will maintain all records of all mandatory reports to the DCJ in a secure location.



Part 8: Mandatory Reporting Risk Of Harm Procedure:

This obligation can be met by making a report to Child Safety/Ministry Officer (Or Senior Pastor) by completing the “*Child Safe ROH Form*”. Centralised reporting is best practice, enabling a more holistic view of matters related to a child and assuring appropriate action.

If you receive a disclosure of abuse, witness an incident, or form a reasonable suspicion that a child is at risk of harm, you must follow these 4 steps immediately:

Step 1: RESPOND: Ensure Immediate Safety

- If a child is in immediate danger or requires urgent medical attention, call Emergency Services (000) straight away.
- Separate the child from the source of danger, ensuring you remain visible to other adults.
- Comfort the child without making false promises (e.g., *do not* promise to "keep this a secret").

Step 2: RECORD: Document the Details

- Write an accurate, objective record of what you saw, heard, or suspected.
- Use the child’s exact words where possible. Do not interpret, judge, or add your own assumptions.
- Complete this documentation within 2 hours of the incident or disclosure using the “*Child Safe ROH Form*”.

Step 3: REPORT: Notify the Child Safety/Protection Officer

- Immediately submit your written report to the designated Child Safety/Protection Officer (or senior Pastor).
- *Exception:* If the allegation involves the Child Safety/Protection Officer or Senior Pastor, report directly to the AFBC Safe Ministry Department or the NSW Police.

Step 4: REFER: External Statutory Reporting

The Safe Church Officer (or the person who observed the harm) must ensure the following external agencies are notified according to NSW law:

Scenario	Agency to Notify	Timeframe
Reasonable suspicion that a child is at risk of significant harm (ROSH)	NSW Department of Communities and Justice (DCJ) via the Child Protection Helpline (132 111)	Immediately (within 24 hours)
Immediate threat, historical abuse, or suspected criminal offense	NSW Police via local station or Crime Stoppers (1800 333 000)	Immediately
Allegation or suspicion involving a pastor, church employee, or volunteer	NSW Office of the Children's Guardian (OCG) via the Reportable Conduct Scheme	Within 7 days of the church becoming aware



(8.2) Mandatory Reporting Laws for Pastors In NSW, ministers of religion are Mandatory Reporters.

- **No Confessional Privilege for Child Abuse:** Under section 316A of the *Crimes Act 1900* (NSW), it is a criminal offence for any adult—including pastors, priests, and ministers—to fail to report child sexual abuse to the police if they hold information that could assist an arrest.
- Information obtained during formal pastoral counselling, prayer ministries, or the sacrament of confession is not exempt from this legal requirement. Protecting the child always overrides confidentiality.

(8.3) Confidentiality and Pastoral Care

- **Strict Confidentiality:** Information regarding reports must only be shared with Child Safety/Protection Officer (Or Senior Pastor), external statutory authorities, and the AFBC Safe Ministry Unit. Do not discuss allegations with other church members, small groups, or prayer chains.
- **Pastoral Care for the Child/Family:** The church will appoint a pastoral care representative who is completely independent of the reporting process to support the child and their family.
- **Pastoral Care for the Accused:** If the accused is a member of the church community or staff, a separate church representative will be assigned to provide them with standard pastoral care, ensuring they are kept entirely separate from the victim and the ongoing investigation.

(8.4) Policy Acknowledgment

Every director, pastor, elder, deacon, staff member, and volunteer involved in children's or youth ministry must read this policy annually and sign the acknowledgment form confirming they understand their reporting duties.



Part 9: The Child Safety/Ministry Officer Procedure:

Phase 1: Receiving the Report & Triage

- **Differentiate the Pathways:** Split all incoming disclosures into immediate legal pathways based on the victim and the accused:
- **Determine Risk of Significant Harm (ROSH):** If a child (aged 0–15) is suspected to be at ROSH, the mandatory reporter must use the online  [NSW Mandatory Reporter Guide \(MRG\)](#).
- **Contact the Child Protection Helpline:** If the MRG indicates a report is required, immediately call the Department of Communities and Justice (DCJ) Helpline on **132 111**.
- **Handle Adult Abuse/Domestic Violence:** For adults experiencing abuse within the congregation, prioritize physical safety, maintain strict confidentiality, and connect them to **1800RESPECT**.

Phase 2: Activating Statutory Legal Triggers

- **Enforce the NSW Reportable Conduct Scheme:** If the allegation involves a church worker, employee, or volunteer harming a child, the head of the church entity must notify the  [Office of the Children's Guardian \(OCG\)](#) within **7 business days**.
- **Comply with the Crimes Act:** Under *Section 316A of the NSW Crimes Act 1900*, it is a criminal offence for any adult to fail to report a child abuse offence to the **NSW Police** if they hold information that could assist them.
- **Use Chapter 16A Information Sharing:** Exercise your right under *Chapter 16A of the Children and Young Persons (Care and Protection) Act 1998* to request or share relevant safety information with other prescribed bodies (like schools or other churches) during an assessment.

Phase 3: Externalised & Safe Investigation

- **Step Aside Immediately:** Instantly stand down the accused staff member or volunteer from all ministry duties, rostered positions, and church premises via a formal, paid or unpaid administrative suspension.
- **Yield to Police Primacy:** If the NSW Police or DCJ are active, **cease all internal church inquiries** so you do not contaminate evidence or interfere with a criminal investigation.
- **Appoint a Professional Standards Unit:** Avoid using local pastors or elders to investigate. Instead, rely on your denomination's central Professional Standards Office or an independent, external investigator.



Phase 4: Resolution & Safe Ministry Compliance

- **Action the Findings:** If allegations are sustained, terminate employment or volunteering roles, update internal church registers, and permanently revoke the person's church authority.
- **Verify Working with Children Checks (WWCC):** Ensure your church strictly manages a local register to continuously monitor and verify the **Working with Children Check** status of every individual in child-related ministry.
- **Embed the 10 Child Safe Standards:** Audit your church environment against the  [OCG Faith-Based Child Safe Standards](#). Ensure all staff undergo accredited Safe Ministry training at least once every three years

The Child Safety Officer (Or Senior Pastor - in conjunction with the Eldership) will follow the procedure "A Mandatory Reporters Guide" when handling the matter and reportable conduct.

<https://reporter.childstory.nsw.gov.au/s/mrg>

<https://reporter.childstory.nsw.gov.au/s/article/Guide-To-Selecting-A-Decision-Tree>



Part 10: Mandatory Reporting - Reportable Conduct Within the Church:

(10.1) Purpose:

The purpose of this policy is to define the legal, ethical, and organizational obligations of **[Church Name]** regarding **Mandatory Reporting** and **Reportable Conduct**. This policy ensures that any allegation, disclosure, or reasonable suspicion of child abuse, neglect, or inappropriate behaviour by church workers is escalated immediately to secular law enforcement and statutory oversight bodies without internal delay or interference.

The purpose of this policy is to ensure that **[Church Name]** actively protects children from harm by establishing a clear, mandatory process for identifying and responding to allegations of reportable conduct. This policy embeds the NSW Reportable Conduct Scheme directly into our ministry operations. It ensures that our leadership governance fulfills its statutory obligation to notify the OCG of any allegations against church workers within 7 business days.

(10.2) Application:

This policy must be strictly applied by **all personnel**, with ultimate legal accountability resting on the **Senior Pastor, Safe Ministry Officer, and the Church Governing Body** as the designated "Head of Entity" under statutory legislation. Adherence is non-negotiable. No individual within the church has the authority to veto, delay, or internally investigate a matter in a way that interferes with an immediate external report.

(10.3) Scope:

This policy applies universally across **[Church Name]** to all individuals who represent or work within our community. This includes:

- **Pastors and Ministry Leaders:** Senior pastors, assistant pastors, elders, deacons, and visiting ministers.
- **Paid Employees:** Administrative staff, youth ministers, cleaners, and technical crew.
- **Volunteers:** Sunday School teachers, youth leaders, music team members, hospitality servers, and creche workers.
- **Contractors:** Third-party providers operating on church grounds during ministry activities regardless of whether their specific role is child related.
- **Reportable Individuals:** Any church worker subject to an allegation, regardless of whether the alleged conduct occurred on church property, during church events, or in their private life.
- **All Contexts:** Physical campus activities, off-site camps, mission trips, and digital platforms (e.g., social media, online youth groups).



(10.3) Policy:

(a.) Mandatory Reporting of Child Abuse

- **Statutory Duty to Report:** Any worker who forms a reasonable suspicion, receives a disclosure, or witnesses behaviour indicating that a child is at risk of significant harm must report it directly to the police and the state child protection authority (such as the **Department of Communities and Justice / Child Story Reporter** in NSW).
- **Zero Delay Protocol:** Reports to external legal authorities must be made immediately. Workers must not seek internal pastoral approval, consult the church board, or wait for an internal review before notifying the authorities.
- **Individual Accountability:** Mandatory reporting is an individual legal obligation. A worker cannot delegate their responsibility to report a disclosure to a supervisor or senior pastor.

(b.) Reportable Conduct Schemes (Head of Entity Obligations)

- **Defining Reportable Conduct:** Reportable conduct encompasses broader behaviours than criminal abuse, including sexual misconduct, sexual offences, physical abuse, ill-treatment, neglect, or psychological harm perpetrated against a child by a church worker.
- **Notification to Oversight Bodies:** Under statutory regulations (such as the **Office of the Children's Guardian** in NSW), the Head of Entity (AFBC Child Safe Relation Officer) (Senior Pastor/Board Chair) must formally notify the oversight body within **7 business days** of becoming aware of any reportable conduct allegation against a worker.
- **Mandatory Independent Investigation:** The AFBC/church must cooperate fully with law enforcement. Once cleared by police, the church must ensure a thorough, independent, and legally compliant investigation is conducted into the allegation, submitting a final report to the statutory oversight body.

(c.) Immediate Safeguarding Actions

- **Mandatory Stand-Down:** Any staff member or volunteer who is the subject of a reportable conduct allegation or police investigation must be stood down immediately from all ministry duties, suspended with pay (if staff), and restricted from accessing church property or digital spaces pending the resolution of the matter.
- **Victim Centric Protection:** The church will prioritize the safety, medical, and psychological needs of the child who made the disclosure, ensuring they and their family are provided with professional counselling resources and pastoral care separated entirely from the investigation infrastructure.



(d.) Confidentiality, Whistleblower Protections, and Penalties

- **Strict Confidentiality:** Information regarding mandatory reports and reportable conduct investigations must be kept strictly confidential to protect the integrity of police investigations and the privacy of the child. Access to records is restricted strictly to the Safe Ministry Officer and legal authorities.
- **Whistleblower Protections:** The church governing body guarantees that no worker will face disciplinary action, social ostracization, or termination for making a report or raising a child safety concern in good faith.
- **Failure to Report:** Any worker who deliberately fails to report a disclosure, attempts to cover up an allegation, or delays an external report will face immediate termination of employment or volunteer service, alongside potential criminal prosecution under local failure-to-report laws.

(e.) Secure and Permanent Document Governance

- **Verbatim Reporting:** All disclosures must be documented on an Incident Report Form within 24 hours, recording the exact words used by the child without alteration, personal interpretation, or leading commentary.
- **Permanent Retention:** All records concerning mandatory reports, notifications to the Children's Guardian or Police, and reportable conduct investigation files must be stored in an encrypted, restricted-access database and retained permanently to comply with historical abuse legislative frameworks.

(10.4) Procedure Statement: Defining Reportable Conduct

(a.) Reporting Requirements

A Pastor, Ministry Leader, Paid Employee, Leader or Volunteer from **[Church Name]** Children's Ministries who have any concerns about any other Pastor, Ministry Leader, Paid Employee, Leader or Volunteer engaging in conduct that is considered inappropriate or is reportable conduct must report their concerns to the Child safety/Protection Officer (Or Senior Pastor) as soon as possible.

Leaders and Volunteers must also report immediately to the Child safety/Protection Officer (Or Senior Pastor) if they become aware of any allegation of inappropriate conduct or reportable conduct in relation to themselves or Pastor, Ministry Leader, Paid Employee, Leader or Volunteer at **[Church Name]**.

The Conduct does not have to have occurred at or during the leader's or volunteer's work at **[Church Name]**. Where it is uncertain if the conduct is reportable conduct but is considered inappropriate behaviour, this must also be reported. If the concern or allegation involves the Senior Pastor or Child Protection Officer, the leader or volunteer must report to the AFBC and **[Church Name]** Eldership.

Children Workers or Youth Pastor must report to the Child safety/Protection Officer (Or Senior Pastor - in conjunction with the Eldership) if they become aware that a leader or volunteer has been charged with or convicted of an offence (including a finding of guilt without the court proceeding to a conviction) involving reportable conduct. This includes information relating to the Leader or volunteer themselves.



Leaders or volunteers are not required to and must not undertake any investigation of the matter. The Child safety/Protection Officer (Or Senior Pastor - in conjunction with the Eldership) under the Children's Guardian Act 2019 must submit a notification form to the OCG within 7 business days of becoming aware of a reportable allegation or conviction against a leader or volunteer and then investigate the allegation of reportable conduct in accordance with the definition of Reportable Conduct.

The Child safety/Ministry Officer (Or Senior Pastor - in conjunction with the Eldership) will follow the procedure "A Reportable Conduct Reporters Guide" when handling the matter and reportable conduct.

Office of the Children's Guardian- How to report a concern:

<https://ocg.nsw.gov.au/employees-and-volunteers/how-report-concern>

(10.5) What is Reportable Conduct

Under the Children's Guardian Act 2019, reportable conduct is defined as:

- A sexual offence (with examples including sexual touching of a child, child grooming offence; and production, dissemination or possession of child abuse material.)
- Sexual misconduct
- An assault against a child
- Ill-treatment of a child
- Neglect of a child
- An offence under section 43B (failure to protect) or section 316A (failure to report) of the Crimes Act 1900; and
- Behaviour that causes significant emotion or psychological harm to a child.

For the purposes of reportable conduct, a child is defined as a person under the age of 18 years. This would include a child or young person who has entered **[Church Name]** facility.

Reportable conduct does not include:

- Conduct that is reasonable for the purpose of discipline, management, or care of children, having regard to age, maturity, health or other characteristics of the children and relevant codes of conduct or professional standards; or
- The use of physical force that, in all the circumstances, is trivial or negligible and the circumstances in which it was used have been investigated and the result of the investigation has been recorded in accordance with appropriate procedures.



(a.) Inappropriate Behaviour.

Behaviour that is not in accordance with the Child Safety Code of Conduct should be reported to the Child Safety/Ministry Officer (Or Senior Pastor) in accordance with section 4.1. Breaches of the Code will not always constitute reportable conduct and may not result in a report to the OCG but must be reported internally to enable assessment and appropriate action to be taken. Reportable conduct is defined explicitly under NSW law. It refers to specific allegations, offenses, or convictions involving a child (any person under 18), regardless of whether the alleged conduct occurred inside or outside of church activities. This includes:

- Sexual Offenses: Any sexual misconduct, assault, or offense committed against or in the presence of a child.
- Sexual Misconduct: Inappropriate grooming behaviours, boundary violations, or sexually explicit communication.
- Ill-Treatment: Physical assault, excessive or harmful force, or severe emotional abuse.
- Neglect: The persistent failure to provide a child with basic physical, emotional, or medical care.
- Psychological Harm: Conduct that causes severe psychological trauma, including witnessing severe domestic violence.

(b.) Mandated Reporting & Response Obligations

- Immediate Internal Reporting: Any person covered by this scope who forms a reasonable suspicion, or receives a direct disclosure of reportable conduct, must report it to the Child Safety/Ministry Officer (Or Senior Pastor)] within 24 hours.
- Statutory Notification: The Head of the Organisation holds the absolute legal responsibility to notify the Office of the Children's Guardian within 7 business days of becoming aware of the allegation.
- Police Primacy: If the allegation involves a criminal offense or immediate danger, a report must be made to the NSW Police immediately. Church leadership will pause internal investigations if directed by police to avoid contamination of evidence.
- Administrative Suspension: The accused worker will be stood down immediately from all public ministry, rosters, and contact with children pending the outcome of the investigation.
- Whistleblower Protection: The church guarantees strict confidentiality and zero tolerance for retaliation against any person who reports suspected abuse in good faith.



Part 11: Recognizing and Reporting Harmful or Concerning Behaviour in Children

(11.1) Harmful or Concerning Behaviours.

[Church Name] leaders and volunteers respond to a range of student behaviour as part of their role at **[Church Name]**. It can be hard to distinguish between developmentally appropriate sexual behaviour and harmful sexual behaviour. It may be difficult to know if there is a problem and if there is, how best to respond.

As a general guide:

Any behaviour that is harmful, problematic, forceful, secretive, compulsive, coercive or degrading signal a need to provide immediate protection and follow up support.

(11.2) Reporting and Response Requirements

All sexual behaviour displayed or disclosed by students, whether it is age-appropriate, concerning, or harmful, requires some level of information, support and a proactive response from **[Church Name]**.

Responding to a child with harmful sexual behaviour involves considering **[Church Name]** duty of care to any child who is an alleged victim and to the child who may be exhibiting harmful sexual behaviours.

Workers are required to report immediately to the Child Safety/Ministry Officer (Or Senior Pastor) where any incident where a child is exhibiting Harmful or Concerning Sexual Behaviour. This may include behaviour outside **[Church Name]** which has the potential to impact on a child's relationships or wellbeing, and which has been reported to an **[Church Name]** Children's Ministry worker and has direct impact to those around the child and the ministry.

If there is an immediate danger to a child or young person and the Child Safety/Ministry Officer (Or Senior Pastor) is not contactable, the employee should contact the Police (000) and/or the Child protection Helpline (13 21 11) directly and then advise the Child Safety/Protection Officer (Or Senior Pastor) as soon as possible.

The Child Safety/Ministry Officer (Or Senior Pastor) will determine actions to be taken, based on an assessment of the behaviour outlined in 5.1 which may include:

- Where the behaviour is directed at another child, reporting the matter to the Police or DCJ.
- Plans to support a child who is exhibiting Harmful or Concerning Sexual Behaviour and any children to which this behaviour has been directed.



Part 12: Incident Management Policy

(12.1) Purpose:

The purpose of this policy is to ensure that the AFBC/church governing body responds swiftly, legally, and compassionately to any incident, injury, or allegation of abuse. It establishes a transparent, structured roadmap to protect victims, comply with mandatory reporting laws, and manage risks to the church community.

(12.2) Application:

This policy must be executed immediately by **all clergy, staff, volunteers, and the church governing body** whenever an incident occurs or a disclosure is made. Adhering to this policy is mandatory. No individual may conduct an internal investigation in a way that delays or interferes with reporting to external legal authorities.

(12.3) Scope:

This policy applies to all incidents occurring on church property, during church-sanctioned events, or on digital platforms. It covers:

- **Child Protection Incidents:** Disclosures, suspicions, or allegations of child abuse, neglect, or grooming.
- **Safety and Medical Incidents:** Physical injuries, medical emergencies, accidents, or near-misses.
- **Behavioural Breaches:** Harassment, bullying, or violations of the church's Code of Conduct by staff or volunteers.

(12.4) Policy:

(a.) Immediate Response and Safety

- **Prioritise Safety:** The immediate safety and medical well-being of the victim or injured person is the absolute priority.
- **Medical Intervention:** Staff or volunteers must administer first aid immediately or contact emergency services (000) if urgent medical care is required.
- **Isolate Harm:** If an allegation involves a staff member or volunteer, they must be removed immediately from contact with children or vulnerable people pending an investigation.

(b.) Mandatory External Reporting (DCJ - Child Protection)

- **Law Enforcement:** Any allegation or reasonable suspicion of criminal conduct or child abuse must be reported directly to the Police and relevant child protection authorities (e.g., *the Child Story Reporter/DCJ in NSW*).
- **No Internal Delays:** Reports to the police must be made immediately. Staff must not delay external reporting to conduct internal church investigations or seek internal approvals.
- **Reportable Conduct:** The Child Safe/Ministry Officer must notify statutory oversight bodies (such as the Office of the Children's Guardian in NSW) of any reportable conduct allegations against staff or volunteers within the legally mandated timeframe.



(c.) Internal Reporting and Documentation

- **Incident Report Form:** The person who witnesses the incident or receives a disclosure must complete a formal Incident Report Form within 24 hours.
- **Factual Recording:** Documentation must be strictly factual, recording the date, time, location, names of those involved, and exact statements made, without speculation or personal opinion.
- **Governing Body Notification:** The Child Safe/Ministry Officer must immediately notify the Senior Pastor and the head of the church governing body of any serious incident or statutory report.

(d.) Incident Investigation and Resolution

- **Cooperation with Authorities:** The church will fully cooperate with any investigation led by the police or statutory child protection agencies.
- **Internal Disciplinary Action:** Independent of criminal outcomes, the governing body will review breaches of the Code of Conduct. This may result in suspension, termination of employment, or removal from volunteer rosters.
- **Debriefing and Care:** The church will provide pastoral care and professional support resources (such as counselling) to victims, families, and affected staff or volunteers.

(e.) Risk Review and Record Retention

- **Root Cause Analysis:** Following any serious incident, the governing body must conduct a safety review to identify how the incident occurred and implement preventative risk controls.
- **Secure and Permanent Storage:** All incident reports, investigation notes, and notifications to authorities must be stored in a highly secure, encrypted, and restricted-access database.
- **Statutory Retention:** Records involving child protection allegations or injuries to minors must be retained permanently (or for the legally mandated period of several decades) to fulfill historical accountability requirements.



Part 13: Safe Ministry Training and Education

(13.1) Purpose:

The purpose of this policy is to ensure that all personnel within **[Church Name]** are equipped with the knowledge, skills, and awareness necessary to maintain a child-safe environment. This policy establishes a structured, mandatory training framework designed to help leaders recognize indicators of abuse, respond correctly to disclosures, understand professional boundaries, and fulfill their statutory obligations.

[Church Name] will ensure all elders, deacons, pastors, child safe/ministry office, leaders, volunteers, and employees are provided with a copy of this policy. All new leader, volunteer, and employee will be required to read this policy and sign the acknowledgement that they have read and understood the Policy prior to starting their ministry.

(13.2) Application:

This policy applies to **all individuals seeking to serve, lead, or govern** within **[Church Name]**. Completion of the mandated training modules is a strict prerequisite for service. No individual may commence or continue in a ministry role—especially those involving children, youth, or vulnerable people—without verified, up-to-date compliance logged in the church's central database.

(13.3) Scope:

This policy governs the education requirements across the entire church community, specifically categorizing personnel into three tiers:

- **Tier 1: Governance & Elders/Pastors:** Ordained ministers, pastors, elders, deacons, church council members, child safe/ministry officer and board directors.
- **Tier 2: Child-Facing Workers:** Ministry oversight, ministry staff/worker, Sunday School teachers, youth group leaders, creche helpers, and paid ministry staff.
- **Tier 3: General Volunteers:** Welcomers, morning tea servers, audio-visual teams, and event contractors.

(13.4) Policy:

(a.) Mandatory Foundational Induction

- **Pre-Service Prerequisite:** Before commencing any ministry work with children or youth, all Tier 1 and Tier 2 personnel must successfully complete the church's approved foundational Safe Ministry induction course.
- **Core Competencies:** The induction training must cover the church's Child Safe Standards, behavioural boundaries (such as the Two-Adult Rule), identifying signs of grooming or abuse, and the exact steps for handling a disclosure.
- **Temporary Conditional Service:** Under no circumstances may an untrained volunteer be left unsupervised with minors. Untrained volunteers may only assist a fully certified leader on a short-term basis while awaiting their upcoming training window.



(b.) Tiered Training Requirements

- **Tier 1 (Governance & Elders/Pastors):** Leadership must complete advanced safeguarding modules focused on institutional risk management, reportable conduct laws, "Head of Entity" legal obligations, and complaint-handling procedures.
- **Tier 2 (Child-Facing Workers):** Workers must complete practical, operational modules focused on physical safety, digital boundary management, and child empowerment strategies.
- **Tier 3 (General Volunteers):** General volunteers must complete a basic awareness briefing regarding the church's Code of Conduct and instructions on how to immediately report a concern to the Safe Ministry Officer.

(c.) Mandatory Refresher Intervals

- **Three-Year Recertification:** Safe ministry training is not a one-off requirement. All Tier 1 and Tier 2 personnel must undergo full recertification or an approved refresher course every **three years**.
- **Legislative Updates:** The Child safety/ Ministry Officer must deliver supplementary briefing sessions if significant updates occur in local child protection or mandatory reporting legislation between regular three-year cycles.

(d.) Verification, Tracking, and Compliance Records

- **Centralized Registry:** The church administration must maintain a secure, up-to-date Safe Ministry Training Database. This database tracks individual completion dates, certification numbers, and upcoming expiration warnings.
- **Evidence of Completion:** Personnel must provide a physical or digital copy of their training certificate to the Child Safe/Ministry Officer to clear their profile for service.
- **Non-Compliance Protocol:** Any worker who fails to complete their refresher training before their certificate expires will be automatically stood down from their rostered duties until compliance is achieved.

5. Training Budget and Community Education

- **Funding Allocation:** The Church Governing Body must allocate dedicated annual funding to cover the costs of training materials, external courses, and database tracking systems.
- **Congregational Awareness:** The church will periodically provide basic safe-ministry information to the wider congregation, ensuring parents and guardians understand the standards of care they should expect from church leaders.



Safe Ministry Training every 3 years is required for all involved in Children's Ministries/Youth Ministries and any other training required by the Senior Pastor in conjunction with the Eldership. The training complements this Policy and provides information to everyone about their legal responsibilities related to child protection including:

- Mandatory reporting – including identifying children at risk of significant harm.
- Reportable conduct
- Code of conduct

A new leader, volunteer, and employee will complete safe ministry training 3 months prior to commencing in their ministry but no later than 3 months after commencement if approved by the Senior Pastor.

All other leaders, volunteers, and employees who undertake child related work must complete Safe Ministry Training as required by the Child Safety/Ministry Officer (Or Senior Pastor)



Part 14: Involving our Children

(14.1) Purpose:

The purpose of this policy is to formalize **[Church Name]**'s execution of **National Principle / Child Safe Standard 2: Children and young people are informed about their rights, participate in decisions affecting them, and are taken seriously.** This policy shifts protection from a top-down model to a participatory one, ensuring "protection through participation" by equipping children with the tools, agency, and confidence to speak up if they feel unsafe.

It is **[Church Name]** Policy that we have simple and accessible information and processes in place to assist all children in our ministries to communicate when they do not feel safe.

[Church Name] will ensure that children are aware of their rights and how to speak up in a manner that is consistent with the church's statement of faith and a Biblical World View.

(14.2) Application:

This policy applies directly to **all ministry staff, youth pastors, Sunday School teachers, and creche workers** who facilitate programs for minors. It must be utilized during curriculum planning, room designs, and ministry evaluations. Implementing these participation structures is a non-negotiable operational standard for all child-facing teams.

(14.3) Scope:

This policy governs all interactive environments within **[Church Name]**, covering:

- **Ministries:** Creches, kids' church, Friday night youth groups, music ministries, and holiday camps.
- **Communications:** Child-targeted curriculum, feedback boxes, church noticeboards, and kids' safety signage.
- **Demographics:** All infants, children, and teenagers up to 18 years of age, ensuring age-appropriate engagement for every developmental stage.

(14.4) Policy:

(a.) Education on Rights and Abuse Prevention

- **Informing Children of Rights:** Every child in our programs must be taught about their basic rights in an age-appropriate manner, including their right to feel safe, to say "no" to unwanted physical contact, and to be listened to.
- **Visible Child-Friendly Resources:** Visual aids (such as posters or child-friendly brochures) must be displayed clearly in ministry areas, detailing who children can talk to if they are worried or unhappy.



(b.) Active Feedback and Consultation Mechanisms

- **Consulting on Decisions:** Ministry leaders must actively consult children on matters that affect them, including youth camp rules, playground updates, and the selection of ministry activities.
- **Child-Centred Feedback Channels:** The church will implement accessible, child-friendly feedback loops, including anonymous suggestion boxes at check-in desks and informal seasonal surveys.
- **Continuous System Improvements:** The Child Safe/Ministry Officer will review children's feedback semiannually, ensuring their insights directly shape safety policy updates and hazard reductions.

(c.) Attuned Listening and Communication Training

- **Active Listening Standards:** All child-facing staff and volunteers must undergo training in child-centered communication techniques, prioritizing strengths-based and active listening practices.
- **Attunement to Signs of Harm:** Workers must remain highly alert to subtle shifts in a child's behaviour, play patterns, or drawings that indicate potential anxiety, isolation, or harm.
- **Taking Children Seriously:** Adults must never dismiss, minimize, or ignore a child's complaint, negative feedback, or emotional distress. Every disclosure or concern must be treated with immediate gravity.

(d.) Supporting Friendships and Reducing Isolation

- **Fostering Peer Connections:** Ministry programs will be structured to intentionally promote positive friendships and team building, as healthy peer support reduces a child's vulnerability to isolation and grooming.
- **Anti-Bullying Proactivity:** Youth and children's ministries must establish clear anti-bullying guidelines, explicitly discussing behavioural expectations and peer-respect values directly with participants.

(e.) Child-Friendly Complaints Procedure

- **Simplified Escalation Roadmap:** The church will publish a separate, highly simplified, and illustrated complaints process specifically for children and youth.
- **Transparent Follow-Up:** When a child raises an issue, the ministry director must provide them with clear, age-appropriate updates on how their feedback was used and what actions were taken to address their concern.



Part 15: Involving and Informing Families and Our Community

(15.1) Purpose:

The purpose of this policy is to fulfill **National Principle / Child Safe Standard 4** by formalizing **[Church Name]'s** commitment to open, transparent partnership with families and the broader community. This policy ensures that parents, guardians, and caretakers are fully informed about the church's safeguarding practices, are actively involved in safety decisions, and are empowered to co-sign the protection of their children.

(15.2) Application:

This policy applies directly to the **Church Governing Body, Senior Ministry Leaders, Communications Teams, and all Child-Facing Staff and Volunteers**. It must be systematically executed during the onboarding of new families, the promotion of ministry events, and all public communication strategies. Compliance with these notification and engagement rules is mandatory across all ministry departments. **[Church Name]** will make this Child's Safe Policy available on **[Church Name]** website to ensure that it is accessible to all members of the community.

(15.3) Scope:

This policy governs all communication and partnership frameworks within **[Church Name]**, covering:

- **Stakeholders:** Parents, legal guardians, extended family members, carers, congregation members, and local community neighbours.
- **Environments:** Physical welcome desks, registration zones, parent lounges, congregational meetings, church websites, information booklets, and digital parent communication apps (such as church management software and email newsletters).
- **Activities:** Sunday services, youth group briefings, camp permission processes, and community outreach festivals.

(15.4) Policy:

(a.) Transparent Provision of Safeguarding Information

- **Public Policy Accessibility:** The church's Child Safety Policy, Code of Conduct, and screening standards must be permanently published on the church website and available in print at all check-in desks.
- **New Family Welcome Kits:** Every new family enrolling a child in church programs can receive an information pack outlining leader screening requirements, safety boundaries (such as the Two-Adult Rule), and the exact process for raising a concern upon request.
- **Leader Identification Visibility:** The church must ensure that all approved, screened kids' and youth workers are easily identifiable to parents during services, using designated shirts, lanyards, or digital check-in badges.



(b.) Co-Design and Consultation with Families

- **Active Policy Input:** The church will actively seek parent feedback and involvement when drafting, reviewing, or updating its child safe policies, risk management plans, or ministry environments.
- **Parent Safety Focus Groups:** The Child Safe/Ministry Officer can facilitate annual or seasonal parent forums to discuss safety concerns, seek feedback on program operations, and co-design continuous safeguarding improvements upon request by church leadership.
- **Inclusive Communication:** Safety documentation and feedback mechanisms will be made available in accessible, plain-language formats and translated into relevant community languages to support culturally and linguistically diverse (CALD) families.

(c.) Mandatory Consent and Open-Door Operations

- **Informed Consent Frameworks:** Written parental or guardian consent must be obtained via secure digital or physical forms prior to a minor participating in high-risk activities, off-site excursions, church camps, or transport arrangements.
- **Media and Photography Permissions:** No photos or videos of minors may be captured, printed, or broadcast on church livestreams or social media platforms without explicit, signed, and annually renewed parental media consent.
- **Strict Open-Door Access:** Parents and legal guardians maintain an absolute right to visit, observe, and drop in on any children's or youth ministry program their child is attending. (WWCC will be needed) Closed-door or secretive environments are strictly forbidden.

(d.) Clear Complaints Processes for Families

- **Publicized Feedback Channels:** A clear, confidential, and easily navigable complaint-handling process for parents and the community must be publicized on the church noticeboard and digital platforms.
- **Responsive Communication Commitment:** When a parent or community member raises a safety concern, the church leadership must acknowledge the complaint within 24 hours and provide regular, transparent, and age-appropriate updates on how the matter is being resolved.

(d.) Community Safeguarding Accountability

- **Annual Safety Reporting:** The Church Governing Body will present an annual, transparent Child Safety Report to the congregation and community, detailing audit compliance scores, training updates, and continuous safety investments.
- **External Security Alignment:** When the church leases its properties or partners with external community groups (e.g., playgroups, scouts, community choirs), the church will mandate that those third parties provide evidence of independent child safety compliance before approval is granted.



Part 16: Risk Assessment and Management

(16.1) Purpose:

The purpose of this policy is to fulfill **National Principle / Child Safe Standard 8** by embedding a proactive, risk-aware culture across **[Church Name]**. This policy establishes a systematic framework to identify, assess, mitigate, and monitor physical, digital, and operational hazards, ensuring that potential risks of child abuse, injury, or neglect are eliminated before harm occurs. **[Church Name]** will manage child protection risk in the planning and conducting of activities and events using its risk management framework and always consider the particular needs and vulnerabilities of children.

[Church Name] takes children safety seriously. **[Church Name]** will continue to work towards improving its policies, procedures, and practices to ensure the safety of children.

(16.2) Application:

This policy must be actively applied by the **Church Governing Body, Ministry Directors, Event Coordinators, and the Child Safe/Ministry Officer** prior to launching any program, camp, or physical change. A documented risk assessment must be signed off by a designated supervisor before any high-risk ministry activity or off-site excursion commences.

(16.3) Scope:

This policy governs all physical and online environments associated with **[Church Name]**, covering:

- **Physical Environments:** Sanctuaries, classrooms, playgrounds, camping sites, transport vehicles, and rented public venues.
- **Digital Environments:** Official website networks, social media platforms, youth group messaging chats, and live-streamed services.
- **Operational Activities:** Weekly kids' and youth programs, off-site excursions, regional camps, mission trips, and major community outreach festivals.

(16.4) Policy:

(a.) Proactive Environmental Risk Assessments

- **Mandatory Pre-Activity Audits:** A formal, documented Risk Assessment must be completed for all recurring ministries annually, and for all special events (e.g., camps, excursions, community fairs) prior to the event launching.
- **Standardized Matrix Evaluation:** Risk assessments must utilize the church's approved Risk Matrix, evaluating risks based on **likelihood** and **consequence**, and outlining specific, practical control measures to reduce high-risk activities to an acceptable level.
- **Environmental Sightline Control:** Physical room risk assessments must explicitly evaluate structural blind spots, ensuring all ministry rooms maintain clear viewing windows, open doors, or open plan layouts to eliminate isolated spaces.



(b.) Digital Risk Mitigation and Controls

- **Virtual Space Audits:** The digital ministry footprint must be reviewed quarterly by the Child Safe/Ministry Officer to identify vulnerabilities to online grooming, cyberbullying, or unauthorized content sharing.
- **Strict Digital Access Rules:** Online platforms, youth group chats, and video conferences must utilize restricted privacy controls and maintain a minimum of two adult moderators at all times. Private, unmonitored digital communication between an adult worker and a minor is strictly prohibited.
- **Data Security Risk Planning:** Church databases storing highly sensitive children's data, parent contact sheets, and leader background screening logs must be encrypted, password-protected, and restricted strictly to authorized administrative personnel.

(d.) Off-Site and High-Risk Activity Controls

- **High-Risk Pre-Approvals:** Excursions, camps, and water-based activities are classified as high-risk and require written approval from the Church Governing Body alongside a comprehensive, tailored risk management plan.
- **Strict Transport Boundaries:** Church workers must never transport a single child alone in a vehicle unless in an emergency or with explicit, written, pre-arranged parental consent. Whenever transport is required, the Two-Adult Rule or multi-passenger arrangements must be utilized.
- **Mandatory Ratios and Signage:** All activities must enforce strict, age-appropriate leader-to-child ratios that meet or exceed local statutory regulations. Clear signage must demarcate child-safe ministry zones from general public access areas.

(e.) Dynamic Risk Monitoring and Incident Integration

- **Real-Time Hazard Management:** Leaders must remain vigilant during activities and possess the authority to dynamically pause or alter an event if an unmanaged environmental hazard (e.g., severe weather, broken equipment) arises.
- **Post-Incident Risk Adjustments:** Following any documented accident, near-miss, or safety boundary breach, the Safe Ministry Officer must review the corresponding risk management plan within 7 days to implement stronger preventative controls.

(f.) Governance Review and Systemic Accountability

- **Annual Board Review:** The Church Governing Body will formally review the church's global Risk Register annually, ensuring safety control measures remain robust and compliant with updated legislative standards.
- **Record Retention:** Completed risk assessment forms, permission slips, and mitigation logs must be stored securely and retained for a minimum of 7 years (or permanently if relating to historical church camps) to meet governance and insurance requirements.



Part 17: Physical and Online Environments:

(17.1) Purpose:

The purpose of this policy is to fulfill **National Principle / Child Safe Standard 8** by ensuring that **[Church Name]** design, modify, and monitor its physical and digital spaces to promote safety and well-being. This policy establishes proactive environmental boundaries to prevent child abuse, reduce physical hazards, and eliminate opportunities for online grooming, cyberbullying, or unauthorized surveillance.

(17.2) Application:

This policy must be strictly applied by the **Church Governing Body, Ministry Leaders, Event Organisers, and IT/Media Personnel** when managing weekly activities, planning renovations, or launching online platforms. Compliance with these physical and digital environmental boundaries is a non-negotiable operational standard for all church personnel.

The purpose of this policy is to cultivate a safe, welcoming, and Christ-centered environment. Specifically, this policy aims to:

- **Protect vulnerable individuals** from harm, abuse, neglect, or exploitation within our ministry spaces.
- **Secure digital platforms** to prevent cyber bullying, online grooming, and data privacy breaches.
- **Maintain spiritual integrity** and operational compliance with local duty-of-care legislation.

(17.2) Scope:

This policy applies to everyone involved in the life and leadership of the church community. This includes:

- pastors, elders, and church staff.
- Volunteer leaders, Sunday School teachers, and youth workers.
- Congregation members, ministry participants, and visitors.

This policy governs all spatial interactions under the jurisdiction of **[Church Name]**, specifically covering:

- **Physical Environments:** Sanctuaries, Sunday School classrooms, creches, youth spaces, counselling offices, bathrooms, playgrounds, transport vehicles, and off-site camp properties.
- **Digital Environments:** Official church websites, live-streamed services, social media handles, church management databases, and digital communication networks (e.g., WhatsApp, Zoom, Discord, or SMS) used for kids' or youth ministries.



(17.3) Policy:

(a.) Physical Church Environments

- **Two-Adult Rule:** A minimum of two screened, approved adults must always be present during any child or youth ministry activity.
- **Open Visibility:** All classroom and meeting room doors must feature a clear window, or remain open, to ensure high visibility.
- **Secure Pick-Up:** Sunday School and childcare areas must enforce a strict check-in and check-out protocol for minors.
- **Facility Security:** Church buildings must use controlled access, visitor logs, and clear signage during non-worship hours.

(b.) Physical Environment Boundaries and Sightlines

- **Open Visibility Infrastructure:** All rooms utilized for children's or youth ministries must feature clear viewing windows in doors, or the doors must remain propped fully open during sessions.
- **Elimination of Blind Spots:** Curtains, room dividers, or furniture arrangement must not create isolated pockets or sightline blind spots out of view of other leaders.
- **Bathroom and Changing Zone Protocols:** Adult staff and volunteers must use designated adult restrooms. Staff must never enter a single-cubicle restroom or changing area alone with a child unless in an absolute emergency, in which case a second adult leader must be stationed directly outside.
- **Secure Ministry Zoning:** During hours of children's programming, specific ministry zones (such as kids' classrooms and playgrounds) must be physically demarcated and restricted to pre-screened, authorized workers and registered children. Visitors or general congregation members must check in at a welcome desk.

(c.) Digital and Online Ministries

- **Public Communications:** Ministry leaders must use official church channels, rather than personal accounts, to message youth or children.
- **Group Chat Monitoring:** All official digital youth groups or online fellowship rooms must have at least two adult moderators.
- **Livestream Privacy:** Cameras must focus on the platform; congregation seating areas should ideally remain off-camera to protect privacy.
- **Media Consent:** Written parental consent is mandatory before publishing photos or videos of minors on church websites or social media.

(d.) Digital Ministry Controls and Communication Rules

- **The Two-Adult Digital Rule:** All official digital youth groups, virtual classrooms, or online fellowship spaces must feature a minimum of two adult moderators at all times.
- **No Private Messaging:** Adult leaders must never engage in private, unmonitored direct messaging (DM) with a minor via text, social media, or gaming networks. All digital communication must be routed through public group chats, or copy in the minor's parent or guardian.



- **Official Corporate Channels Only:** Staff and volunteers must use official church-administered accounts, email addresses, or phone lines to contact youth or parents, rather than personal accounts.
- **Data and Network Security:** Church databases containing sensitive minor records, medical forms, and parent contact logs must be securely encrypted, password-protected, and restricted strictly to authorized administrative staff.

(e.) Media, Photography, and Livestream Privacy

- **Mandatory Media Consent:** No photographs, video recordings, or identifying details of minors may be taken, printed, or broadcast on church platforms without explicit, written parental consent.
- **Livestream Camera Positioning:** Church cameras broadcasting services online must remain focused strictly on the main platform or altar. Congregation seating areas must be angled out of view to preserve the privacy of families and children in attendance.
- **Device Storage Restrictions:** Church workers are strictly prohibited from storing photos or videos of ministry minors on their personal smartphones, tablets, or cloud storage accounts. All media must be transferred directly to a secure church drive and wiped from personal devices immediately.

(f.) Off-Site and Transport Environment Controls

- **Vehicle Safety Boundaries:** A church worker must never transport a single child alone in a vehicle. Transporting minors requires either two approved adult workers present, or a multi-passenger configuration (e.g., an entire group of youth) with explicit, pre-arranged parental consent.
- **Night-time Supervision Boundaries:** On church camps or mission trips, adult leaders must never enter a minor's cabin or sleeping quarters alone. Any necessary cabin checks or room discussions must be performed by at least two leaders of the same gender as the participants.

(g.) Seasonal Environmental Risk Audits

- **Documented Audits:** The Safe Ministry Officer must conduct and document an environmental safety audit of all physical facilities and active digital channels at least twice a year.
- **Corrective Infrastructure Actions:** Any identified physical hazards (such as broken locks or faulty windows) or digital vulnerabilities (such as unmoderated chat loops) must be logged on the church's Risk Register and resolved immediately by the governing body.

(f.) Reporting and Compliance

- **Mandatory Reporting:** Any suspicion of abuse, harassment, or misconduct must be reported immediately to leadership and legal authorities.
- **Safe Ministry Screening:** All staff and volunteers working with vulnerable people must pass local working-with-children background checks.
- **Annual Policy Review:** Church leadership will review these guidelines every year to update security protocols and technology rules.



Part 18: Whistleblower / Grievance

(18.1) Purpose:

The purpose of this policy is to establish a secure, transparent, and legally compliant framework that empowers individuals to report serious wrongdoing, misconduct, or child safety breaches within **[Church Name]** without fear of retaliation, victimization, or detriment. This policy ensures that grievances are investigated independently and that institutional integrity is maintained by uncovering hidden risks.

(18.2) Application:

This policy applies to the **Church Governing Body, Senior Ministry Leaders, and the Safe Ministry Officer**, who are required to maintain independent reporting channels and act upon disclosures with absolute confidentiality. It must be utilized immediately whenever an individual raises a complaint regarding systemic failures, financial fraud, or misconduct by clergy or leadership.

(18.3) Scope:

This policy is broad and protects any person who makes a disclosure regarding **[Church Name]'s** operations, including:

- **Internal Stakeholders:** All pastors, elders, church council members, paid staff, interns, and active volunteers.
- **External Stakeholders:** Congregation members, ministry participants, parents, guardians, contractors, suppliers, and former employees.
- **Reportable Matters:** Disclosures concerning illegal activity, child abuse, grooming, financial fraud, elder exploitation, serious breaches of the Code of Conduct, or systemic cover-ups of safety risks.

(18.4) Policy:

(a.) Defining Reportable Wrongdoing (Whistleblowing)

- **Whistleblower Disclosures:** A disclosure qualifies for whistleblower protection if the reporter has reasonable grounds to suspect that a church leader, staff member, or volunteer has engaged in misconduct, an improper state of affairs, or a breach of statutory child safe laws.
- **Personal Grievances Distinguished:** This policy does not apply to minor personal work grievances (such as interpersonal friction between volunteers or scheduling disagreements). Personal grievances should be resolved through standard pastoral mediation channels.

(b.) Independent Reporting Pathways

- **Bypassing Local Leadership:** To prevent institutional cover-ups, whistleblowers maintain an absolute right to bypass the pastoral team or local church board entirely.
- **Designated Eligible Recipients:** Reports can be made directly to the Safe Ministry Officer, the Chair of the Church Governing Body, or an independent external body (such as the denominational association's Professional Standards Unit or a dedicated external integrity hotline).



- **Anonymity Protections:** Whistleblowers have the right to make a disclosure anonymously. The church will utilize secure, encrypted digital portals or physical drop-boxes to protect the identity of the reporter.

(c.) Mandatory Protections for Whistleblowers

- **Protection from Detriment:** The church governing body guarantees that no individual who reports a concern in good faith will suffer victimization, termination of employment, dismissal from volunteer rosters, or social ostracization.
- **Strict Confidentiality of Identity:** It is an offense under this policy to disclose a whistleblower's identity, or information likely to lead to their identification, without their explicit consent, except when required by secular law enforcement.
- **Legal Immunity:** Reporting a matter to external statutory bodies (such as the police or child protection agencies) in accordance with local whistleblower protection laws will not violate any church confidentiality agreements.

(d.) Investigation and Transparency Governance

- **Objective Assessment:** Upon receiving a whistleblower report, the eligible recipient must assess the matter objectively within 48 hours to determine if a formal investigation is required.
- **Separation of Investigation:** If the allegation involves a senior pastor or board member, the church must hand the matter over immediately to an independent external investigator to eliminate conflicts of interest.
- **Keeping the Reporter Informed:** Provided the whistleblower's contact details are known, the church will provide regular, confidential updates on the progress and final outcome of the investigation, subject to privacy considerations for the accused.

(e.) Accountability, Penalties, and Record Keeping

- **Penalties for Retaliation:** Any church worker or leader found to have victimized, harassed, or exposed the identity of a whistleblower will face immediate termination of their role and potential legal prosecution.
- **False Disclosures:** While protection is granted to all good-faith reports (even if they prove incorrect), deliberately making a false, malicious, or vexatious claim will result in strict disciplinary action.
- **Permanent Secure Logging:** All whistleblower reports, investigation findings, and oversight notifications must be stored in a highly secure, restricted-access database managed independently of the general parish network.



Part 19: Pastoral Counselling Boundaries and Private Meetings

(19.1) Purpose:

The purpose of this policy is to establish clear ethical, physical, and professional boundaries for pastoral counselling and private meetings within **[Church Name]**. Private pastoral care is an essential ministry, but it inherently involves a significant power imbalance. This policy protects participants from spiritual, emotional, or physical exploitation, while simultaneously safeguarding pastors, elders, and leaders against false allegations of misconduct.

(19.2) Application:

This policy applies to **all individuals authorized by the church to provide pastoral care, guidance, or spiritual direction**. It must be strictly integrated into the daily schedules, office designs, and meeting habits of the pastoral team. Adherence to these boundaries is a non-negotiable operational standard; any deliberate circumvention of these rules must be treated as a serious breach of the church's Code of Conduct.

(19.3) Scope:

This policy governs all structured and unstructured private meetings, covering:

- **Personnel:** Ordained pastors, elders, ministry directors, chaplains, lay counsellors, and small group leaders.
- **Contexts:** Spiritual direction, crisis intervention, marriage counselling, volunteer performance reviews, and informal prayer sessions.
- **Environments:** On-site church offices, homes (during pastoral visitation), public venues (cafes, parks), and digital video-conferencing platforms (such as Zoom or Teams).

(19.4) Policy:

(a.) Physical Environment and Architectural Transparency

- **Mandatory Line of Sight:** All pastoral offices or church rooms used for private counselling must feature a clear, un-obscured viewing window or glass panel in the door.
- **Blind Spot Mitigation:** Curtains, blinds, or large furniture must never be positioned to block the line of sight into the room. If a room lacks a window, the door must remain fully propped open for the duration of the meeting.
- **Alternative Venue Selection:** If a confidential meeting requires absolute auditory privacy that cannot be achieved in a visible room, the meeting must be held in a highly visible public space (such as a cafe) or conducted via an official church video link.

(b.) Frequency, Duration, and Professional Limits

- **Time-Limited Sessions:** Pastoral counselling sessions recommend not to exceed 60 minutes in length, unless an acute crisis situation requires immediate emergency intervention.
- **Session Limitations:** Pastoral care is inherently spiritual and is not a substitute for professional clinical therapy. If a participant requires more than three sessions to address deep-seated psychological issues, trauma, or clinical mental health conditions, the pastor must formally refer them to a qualified, external secular professional.



- **No Late-Night Meetings:** Face-to-face pastoral meetings must not be scheduled or conducted after 8:00 PM on church property or in private homes, unless dealing with an emergency crisis alongside a second ministry worker.

(d.) Mandatory Meeting Logging and Accountability

- **The Pastoral Log:** Every pastor and elder must maintain a professional digital calendar or log detailing the date, time, location, and name of the participant for every private meeting.
- **Confidentiality Maintained:** To preserve spiritual privacy, the log must *not* record the specific personal or spiritual details confessed during the meeting. It serves strictly as an administrative record of the physical interaction.
- **Supervisor Reviews:** The Child Safe/Ministry Officer or Senior Pastor must review the pastoral meeting logs monthly to identify any irregular patterns, excessive sessions with a single individual, or boundary anomalies.

(e.) Gender, Age, and Vulnerability Boundaries

- **The Two-Adult Rule for Minors:** Under no circumstances may a pastor or leader conduct a private, closed-door counselling session with a minor (under 18). Any pastoral care for a child or teenager must occur in an open environment, with a second screened leader present, or with the explicit written consent and physical presence of a parent/guardian.
- **Cross-Gender Care Protocols:** When a pastor is conducting a meeting with an individual of the opposite gender, or where a deep emotional vulnerability exists, the meeting should ideally be co-facilitated by a male and female leader. If a co-leader is unavailable, the meeting *must* take place in a public venue or an office where another staff member is physically present in the adjacent room.

(f.) Physical Contact and Emotional Attachment Boundaries

- **Strict Limits on Touch:** Physical contact during counselling must be strictly limited to socially appropriate gestures, such as a brief handshake. Comforting touch (such as an arm around a shoulder or a hug) must only be initiated if requested by the participant, must be completely transparent to anyone viewing through the window, and must be immediately discontinued if it causes discomfort.
- **Managing Transference:** Pastors must remain highly alert to signs of emotional co-dependency or inappropriate attachment from a participant. If a leader feels that professional boundaries are blurring, or that their own emotional objectivity is compromised, they are strictly obliged to immediately notify their supervisor and transfer the care of that individual to another leader.



Part 20: Vulnerable Adults and Aged Care

(20.1) Purpose:

The purpose of this policy is to formalize **[Church Name]**'s absolute commitment to creating a safe, respectful, and dignified environment for vulnerable adults and elderly congregation members. It establishes robust safeguarding protocols to protect individuals who may be at risk of harm, neglect, spiritual manipulation, or financial exploitation due to age, illness, cognitive decline, or disability.

(20.2) Application:

This policy must be strictly applied by the **Church Governing Body, Ordained Pastoral Team, and all Community Care Coordinators**. It serves as the mandatory operating standard prior to conducting home visits, administering financial support, or running specialized senior care ministries. Compliance with these boundaries is a non-negotiable requirement for all workers serving within the church's care infrastructure.

(20.3) Scope:

This policy governs all ministries and care networks operating under the authority of **[Church Name]**, specifically covering:

- **Personnel:** All pastors, elders, lay chaplains, home communion servers, transport volunteers, and disability support workers.
- **Target Demographics:** Any adult aged 18 or older who is or may be unable to take care of themselves, or protect themselves against significant harm or exploitation, including the elderly, individuals living with physical or intellectual disabilities, and those experiencing cognitive impairment or severe acute illness.
- **Environments & Activities:** Home visitations, aged care facility services, hospital visits, church-run seniors' clubs, disability inclusion programs, and any administrative oversight of tithing, estates, or bequests.

(20.4) Policy:

(a.) Safe Visitation and Home Care Protocols

- **The Dual-Visitor Preference:** Whenever pastoral staff or volunteers conduct home, hospital, or aged care facility visitations, they should ideally operate in pairs. If a solo visit is unavoidable due to resource constraints, the worker must formally log the visit with the church office prior to arrival and departure.
- **Respecting Physical and Domestic Boundaries:** Workers must never enter a vulnerable adult's bedroom or private living quarters unless explicitly invited by the individual or their primary legal caretaker. Physical touch must be strictly limited to socially appropriate, non-intrusive actions (e.g., a handshake or a brief, comforting hold of the hand during prayer) and must be immediately discontinued if the individual shows any signs of discomfort.
- **Medication and Medical Care Restrictions:** Church personnel are strictly prohibited from administering medication, providing clinical medical care, or executing physical transfers (e.g., lifting an individual out of a chair) unless they possess independent, current professional qualifications and have been formally authorized by the church board to perform those specific tasks.



(b.) Financial Integrity and Prevention of Elder Abuse

- **Strict Separation from Personal Finances:** Church workers and volunteers must never enter into private financial transactions, accept personal loans, or manage the personal banking details, credit cards, or pin numbers of a vulnerable adult or elderly congregation member.
- **Bequest and Estate Management Boundaries:** Under no circumstances may a pastor, elder, or church staff member act as a witness to, or assist in the drafting of, a vulnerable adult's will, power of attorney, or estate documents. If a member of the congregation expresses a desire to leave a financial bequest to the church, they must be formally directed to an independent, external legal professional.
- **Dual-Signatory Financial Aid:** Any financial assistance or welfare vouchers provided by the church to a vulnerable individual must be approved and signed off by two authorized members of the church governing body, with all transactions recorded transparently in the church accounts.

(c.) Screening, Recruitment, and Specialized Training

- **Mandatory Background Verifications:** All staff and volunteers assigned to ministries interacting with vulnerable adults or the elderly must undergo full identity verification and pass a national criminal history check (Police Check) prior to service.
- **Recognizing Vulnerability and Abuse:** Care workers must undergo mandatory foundational training to recognize the specific indicators of adult abuse, which include unexplained physical bruising, sudden and uncharacteristic changes in banking patterns, severe self-neglect, or signs of psychological coercion and spiritual manipulation.
- **Regular Training Refresher Cycles:** Personnel operating in vulnerable adult ministries must complete specific safeguarding and elder abuse awareness training refreshers at least once every three years.

(d.) Incident Management and Escalation Pathways

- **Immediate Abuse Escalation:** If a worker witnesses, suspects, or receives a disclosure of physical abuse, severe neglect, sexual assault, or financial exploitation involving a vulnerable adult, they must report the matter directly to local law enforcement and relevant statutory state bodies (such as the **Ageing and Disability Commission** in NSW) immediately and without internal church delay.
- **Factual Incident Reporting:** The worker must complete a formal Incident Report Form within 24 hours of the disclosure or suspicion, documenting the exact observations or statements made, without personal speculation or opinion.
- **Immediate Duty Stand-Down:** If an allegation of misconduct or exploitation is made against a church employee or volunteer, the church governing body will immediately suspend them from all ministry duties and access to church environments pending a full investigation by legal authorities.



(e.) Governance, Privacy, and Record Keeping

- **Strict Medical Information Privacy:** All physical and digital records relating to the medical histories, disability care plans, and personal vulnerabilities of congregation members must be kept strictly confidential, encrypted, and stored in a secure database restricted solely to authorized care directors.
- **Compliance Registry Maintenance:** The Safe Ministry Officer must maintain an up-to-date registry of all volunteer background clearances, training records, and signed code of conduct agreements specific to adult care ministries.



Part 21 : Definitions and Explanation of Terms

Term	Meaning
Assault	1.1 The intentional or reckless application of physical force without lawful justification or excuse, or 1.2 Any act which intentionally or recklessly causes another to apprehend immediate and unlawful violence. An assault can occur when a person intentionally or recklessly (ie. Knows the assault is possible but ignores the risk); - Applies physical force against a child without lawful justification or excuse- such as hitting, striking, kicking, punching, or dragging a child (actual physical force); or - Causes a child to apprehend the immediate and unlawful use of physical force against them – such as threatening to physically harm a child through words, and/or gestures regardless of whether the person actually intends to apply any force.
Active Listening	A structured communication technique requiring the listener to fully focus, understand, respond, and retain what is being said by a child or vulnerable individual without interrupting or interjecting personal opinions.
Adult Moderator	A screened, approved church worker aged 18 or older who is formally appointed to supervise, manage, and monitor communication safety within digital platforms and church-sponsored group chats.
Application	The specific administrative rule dictating exactly who must execute, enforce, and comply with a policy, and the operational triggers that require the policy to be put into immediate action.
Association	The overarching denominational body, network, union, or diocese to which a local church belongs and holds structural, spiritual, or legal accountability.
Attunement	The proactive cognitive skill of being highly alert and responsive to subtle emotional, behavioral, or psychological shifts in a child, allowing workers to detect hidden distress or trauma.
Behaviour that causes significant emotion or psychological harm	Behaviour that causes significant emotional or psychological harm to a child is conduct that is intentional or reckless (without reasonable excuse), obviously or very clearly unreasonable and which results in significant emotional harm or trauma to a child. - Obviously or very clearly unreasonable or serious act or series of acts that the leaders/volunteers/employees knew or ought to have known was unacceptable, and - Evidence of psychological harm to the child that is more than transient, including displaying patterns of “out of character behaviour”, regression in behaviour, distress, anxiety, physical symptoms or self harm, and - And alleged casual link between the leader/volunteer/employee’s conduct and the



	significant emotional or psychological harm to the child.
Behavioural Breach	Any action or conduct by a church worker that violates the established boundaries, rules, or standards set out in the church's Code of Conduct.
Bequest	A formal gift of property, money, or assets left to the church through an individual's legal will or estate planning.
Blind Spots	Physical locations, room layouts, or architectural configurations that obstruct lines of sight and prevent open visual supervision of ministry activities.
Boundary	A clear, established physical, emotional, spiritual, or digital limit designed to protect the safety and integrity of both the ministry participant and the church worker.
Child / Minor	Child is defined in the Children's and Young Persons (Care and Protection) Act 1998 (NSW) as a person who is under the age of 16 years. For the mandatory reporting regime, therefore, a Child is under 16 years, and a young person is aged 16 or 17. For the Purpose of the Children's Guardian Act reportable conduct scheme, a Child is a person aged under 18 years.
Child Abuse	Formally categorized into five core types: physical abuse, sexual abuse, emotional/psychological abuse, neglect, and grooming behaviours.
Child Protection Officer	Person nominated by the Pastor to act as a point of contact for Leaders/volunteers and children on child protection matters. Child Protection officers need to take action where any child protection incidents are reported to them, including immediately informing the Pastor and providing support to affected members of the EBC community. CPOs may also be required to review and monitor the effectiveness of EBC's processes and procedures to respond to allegations or disclosures.
Child Related work	Under the Act and related Regulation (and of relevance to EBC), child related work is work for, or in connection with, any of the following. - Any religious organisation where children form a part of the congregation. - Transport services especially for children where outings apply.
Child Safe Standards	The statutory, legislated principles (such as the 10 Child Safe Standards in NSW or national variants) designed to embed child safety systematically into organizational cultures.
Child-Facing Worker	Any staff member or volunteer whose designated church role involves direct, regular, or unsupervised contact with children or youth.
Clergy	Ordained ministers, priests, pastors, or spiritual leaders who hold official ecclesiastical offices and spiritual authority within the church.
Code of Conduct	A legally binding, signed agreement outlining the mandatory behavior standards, boundaries, and ethical requirements expected of all church workers.



Co-dependency	An unhealthy emotional or psychological reliance where a ministry participant becomes excessively dependent on a pastoral worker, or vice versa, blurring professional boundaries.
Co-Design	The active process of including stakeholders (such as children and parents) in designing, reviewing, and updating safety environments and policies.
Compliance Database	A secure, restricted-access repository used by church administration to track and log worker screening statuses, background clearances, and training records.
Domestic Violence	Domestic Violence is behaviour towards a family member that may include: - Physical violence or threats of violence - Verbal abuse, including threats - Emotional or psychological abuse - Sexual abuse - Financial and social abuse
Disclosure	When a child or vulnerable person explicitly communicates, either verbally, in writing, or through behavior, that they or another person have experienced harm or abuse.
Duty of Care	The strict legal and moral obligation imposed on the church and its workers to take all reasonable steps to prevent foreseeable harm, injury, or abuse to individuals in their care.
Elder Abuse	A single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to an older person.
Environmental Audit	A systematic, documented inspection of physical and digital church environments to identify and resolve security, safety, and boundary risks.
External Recipient	An independent body or legal hotline located outside the local church structure authorized to receive sensitive whistleblower disclosures.
Failure to Protect Offence	Under section 43B of the Crimes Act 1900 (NSW) – Failure to reduce or remove risk of child becoming a victim of child abuse – an adult working in a volunteer/leadership position at EBC will commit an offence if they know another adult that poses as a serious risk of committing a child abuse offence and they have the power to reduce or remove the risk, and they negligently fail to do so either by acts and/or omissions.
Failure to Report Offence	Under section 316A of the Crimes Act 1900 (NSW) – concealing a child abuse offence – and adults will commit an offence if they know, believe or reasonably ought to know that a child abuse offence has been committed and fail to report that information to Police, without a reasonable excuse. A reasonable excuse would include where the adult has reported the matter to the Pastor or Child Protection Officer and is aware that the Pastor/CPO has reported the matter to the Police.
Grooming	A deliberate, deceptive process where an individual establishes a trusting relationship with a child, their family, or community to lower inhibitions and facilitate sexual abuse.



	Definitions of “grooming” within child protection legislation, are complex. Under the Crimes Act, grooming or procuring a child under the age of 16 years for unlawful sexual activity is classed as a sexual offence. The Crimes ACT (s73) also extends to the age of consent to 18 years where a child is in a “special care” relationship. Under Schedule 1(2) of the Child Protection (Working with Children) Act, grooming is recognised as a form of sexual misconduct. The Children’s Guardian Act 2019 and this Child Protection Policy reflect these definitions within the context of the Reportable Conduct Scheme. In general terms, grooming refers to behaviours that manipulated and control a child or young person, their family and other support networks, or institution, with the intent of gaining access to the child or young person for the purposes of engaging sexually harmful behaviour, obtaining the child or young person’s compliance, maintain the child or young person’s silence, and avoiding discovery of the sexual abuse. Grooming is often defined as the use of a variety of manipulative and controlling techniques with a vulnerable subject in a range of inter-personal and social settings in order to establish trust or normalise sexually harmful behaviour with the overall aim of facilitating exploitation and/or prohibiting disclosure of the harmful behaviour.
Grievance	A formal complaint regarding a specific workplace issue, systemic failure, administrative dispute, or breach of organizational protocol.
Head of Entity	The individual who holds ultimate executive responsibility for the church (typically the Senior Pastor or Church Board Chair) under statutory child protection reporting laws.
Incident Report	A formal, strictly factual document used to log the chronological details of any accident, disclosure, injury, or safety boundary breach within 24 hours.
Ill-treatment	Of a child, means conduct towards a child that is: -unreasonable; and - Seriously inappropriate, improper, inhumane, or cruel. Ill treatment can include a range of conduct such as making excessive or degrading demands of a child; a pattern of hostile or degrading comments of behaviour towards a child; and using inappropriate forms of behaviours management towards a child.
Mandatory Reporter	A statutory legal requirement forcing designated individuals (and all church workers under this framework) to report suspected child abuse or neglect directly to state child protection authorities. Under section 27 of the Children’s and Young Persons (Care and Protection) Act 1998, the following persons are required to make mandatory reports: - A person who is involved in Children’s Ministry at EBC.



Near-Miss	An unplanned event or hazard that did not result in injury, illness, or damage this time, but had the clear potential to do so if left unmanaged.
Office of the Children's Guardian (OCG)	The specific statutory regulatory body in New South Wales (NSW) responsible for overseeing child-safe organizations and reportable conduct schemes. (<i>Adaptable to your local state regulator, e.g., CCYP in Victoria</i>).
Open Visibility	An architectural standard requiring all ministry spaces to maintain clear, un-obscured internal sightlines via windows, glass panels, or propped-open doors.
Pastoral Counselling	Structured private sessions focused on spiritual direction, pastoral care, and scriptural guidance, distinct from clinical psychology or professional therapy.
Personnel / Worker	A collective term encompassing all individuals conducting work or ministry for the church, whether they are paid staff, contractors, or unpaid volunteers.
Purpose	The foundational section of a policy document explaining <i>why</i> the rules exist and the specific safety or legal objectives the policy aims to achieve.
Physical abuse	Physical abuse is a non-accidental injury or pattern of injuries to a child or young persons caused by a parent, carer or any other person. It includes, but not limited to, injuries which are caused by: - Excessive discipline - Severe beatings or shakings - Burns - Bruising - Lacerations, - Fractures and dislocations of joints.
Psychological Harm	Refers to a parents or caregiver's inappropriate verbal or symbolic acts towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability. The behaviour of their parent or caregiver damages the confidence and self-esteem of the child or young person, resulting in serious emotional deprivation or trauma.
Reasonable grounds to suspect	Reasonable grounds refer to the need to have an objective basis for suspecting that a child or young person may be at risk of significant harm, based on; - Firsthand observations of the child, young person or family. - What the child, young person or another person disclosed. - What can reasonably be inferred based on ministry training and or experience Reasonable grounds do not mean a person is required to confirm their suspicions or have clear proof before making a report.
Reportable conduct	A specific statutory legal category encompassing broader misconduct against children by workers, including sexual



	offences, misconduct, physical abuse, ill-treatment, or severe neglect. The following conduct, whether or not a criminal proceeding in relation to the conduct has been commenced or concluded. – - A sexual offence - Sexual misconduct - Ill-treatment of a child - Neglect of a child - An assault against a child - An offence under section 43B (failure to protect offence) or 316A (failure to report offence) of the Crimes Act 1900 - Behaviour that causes significant emotional or psychological harm to child Reportable Conduct does not include - Conduct that is reasonable for the purpose of discipline, management or care of children, having regard to age, maturity, healthy or other characteristics of the children and any relevant codes of conduct or professional standards; or - The use of physical force that, in all the circumstance, is trivial or negligible and the circumstances in which it was used have been investigated and the result of the investigation has been recorded in accordance with appropriate procedures.
Reasonable Suspicion	A state of belief formed on objective, logical, or observable grounds that would lead a prudent person to suspect that abuse or harm has occurred or is occurring.
Risk Assessment	The systematic process of identifying operational hazards, evaluating their likelihood and consequences using a matrix, and implementing mitigation controls.
Safe Ministry Officer	A designated, trained individual appointed by the church governing body to oversee daily safeguarding compliance, policy adherence, and screening registers.
Scope	The specific section of a policy defining <i>who</i> , <i>where</i> , and <i>what</i> environments, activities, and demographics are legally bound by the policy's rules.
Screening	The mandatory, multi-tiered vetting process used to evaluate an applicant's suitability for a role, including identity checks, reference verification, and statutory clearances.
Sexual Abuse	Sexual abuse is when someone involves a child or young person in a sexual activity by using their power over them or taking advantage of their trust. Often children and young people are bribed or threatened physically or psychologically to make them participate in the activity.
Sexual misconduct	Conduct with, towards or in the presence of a child that –



	- Is sexual in nature, but - Is not a sexual offence. The Act provides the following (non-exhaustive) examples: - Descriptions of sexual acts without a legitimate reason to provide the descriptions; - Sexual comments, conversations or communications; - Comments to a child that express a desire to act in a sexual manner towards the child, or another child. Note- crossing professional boundaries comes within the scope of the scheme to the extent that the alleged conduct meets the definition of sexual misconduct. That is, the conduct with, towards or in the presence of a child that is sexual in nature (but is not a sexual offence).
Sexual offence	An offence of a sexual nature under a law of the State, another State, a Territory, or the Commonwealth, committed against, with or in the presence of a child, such as - Sexual touching of a child - A child grooming offence - Production, dissemination or possession of child abuse material An alleged sexual offence does not have to be the subject of criminal investigation or charges for it to be categorized as a reportable allegation of sexual offence.
Transference	A psychological phenomenon where a counseling participant unconsciously redirects emotions, attachments, or desires felt toward significant childhood figures onto the pastoral worker.
Two-Adult Rule	A non-negotiable safety standard requiring a minimum of two approved, screened adult workers to be physically or digitally present during any activity involving minors.
Leader/Volunteer Ministry Director Employee,	Means any person who is engaged in work in any of the following capacities. - Leader - Volunteer - Ministry Director - Employee - Youth leader
Verbatim	The strict requirement to record spoken words or text exactly as they were delivered, using the identical phrasing and vocabulary, without paraphrasing or correcting.
Vulnerable Adult	An individual aged 18 or older who, due to age, physical or intellectual disability, cognitive decline, or acute severe illness, is temporarily or permanently unable to protect themselves from harm or exploitation.



Young Person	Defined in the Children and Young Persons (Care and Protection) Act 1998 (NSW) as a person who is aged 16 years or above, but who is under the age of 18 years.
Whistleblower	A person who exposes secretive, illegal, unethical, or unsafe activities within an organization, protected by strict confidentiality and immunity from retaliation.
Working with Children Check (WWCC)	A mandatory, government-verified background clearance required by law for individuals engaging in child-related work or volunteering.
Zero Tolerance	An absolute organizational policy stance meaning that no form of abuse, neglect, grooming, or exploitation will ever be hidden, minimized, excused, or ignored.



Child Protection Acts NSW:

NSW child protection is primarily governed by a few key pieces of legislation, with the ***Children and Young Persons (Care and Protection) Act 1998*** acting as the main framework for child welfare, reporting, and out-of-home care.

The main child protection acts operating in NSW include:

- **Children and Young Persons (Care and Protection) Act 1998:** This is the primary law in NSW. It establishes legal responsibilities for protecting children under 18 years of age who are at risk of significant harm (ROSH), outlines the mandatory reporting system, and governs foster and residential care.
- **Children's Guardian Act 2019:** This act outlines the functions of the Office of the Children's Guardian. It regulates organizations to ensure they are safe for children and oversees the Reportable Conduct Scheme, which handles allegations of misconduct against employees and volunteers.
- **Child Protection (Working with Children) Act 2012:** This legislation provides the legal basis for the Working with Children Check (WWCC). It mandates that anyone in NSW undertaking child-related work (paid or volunteer) must undergo background and criminal history screenings.
- **Offender Management Legislation:** To monitor convicted offenders and restrict them from engaging with children, NSW enforces the Child Protection (Offenders Registration) Act 2000 and the Child Protection (Offenders Prohibition Orders) Act 2004.

Reference and Compliance Statement

This policy has been developed in alignment with current legislative requirements, national frameworks, and industry best practices for safeguarding vulnerable people. In drafting these guidelines, the following primary resources and regulatory bodies were consulted:

Regulatory Frameworks & Legislation:

- [NSW Office of the Children's Guardian](#), including the *Guide to the Child Safe Standards* and sector-specific handbooks for faith-based organisations.
- The [Child Protection \(Working with Children\) Act 2012 No 51 \(NSW\)](#).
- National child safe standards and mandatory reporting guidelines, including the [NSW ChildStory Mandatory Reporter Guide](#).

Denominational & Sector Standards:

- The [Safe Ministry](#) blueprint, code of conduct (*Faithfulness in Service*), and operational guidelines of the Anglican Diocese of Sydney.
- [Creating Safe Spaces](#) training resources and safety health check frameworks.
- [ChildSafe Australia](#) industry standards for churches and religious organisations.



References:

Primary reference materials when creating our child safety policies:

NSW Office of the Children's Guardian

- [Implementing the Child Safe Scheme: An introduction for faith-based organisations](#)
- [Understanding and Developing a Child Safe Policy](#)
- [Guide to the Child Safe Standards](#)
- [What are the Child Safe Standards | Office of the Children's Guardian](#)
- [Faith-based organisations | Office of the Children's Guardian](#)

Safe Ministry Resources

- [SM Guidelines \(PDF\)](#) - 2017 Office of the Director of Safe Ministry -Anglican Church Diocese of Sydney Safe Ministry-Guidelines for Safe Ministry with vulnerable people
- [Child Safe Standards Implementation Resource for Churches](#) - 2024 Office of the Director of Safe Ministry – Anglican Church Diocese of Sydney 1 Child Safe Standards – Implementation resource for churches v1.0
- [Safe Ministry Policy and Practice Overview](#) - 2024 Office of the Director of Safe Ministry – Anglican Church Diocese of Sydney 1 Child Safe Standards – Implementation resource for churches v1.0
- [Faithfulness In Service – Code of Conduct](#) & [Full PDF](#) - <https://safeministry.org.au/faithfulness-in-service-code-of-conduct/>
- [SMC Pastoral Guidelines](#) - 2022 Office of the Director of Safe Ministry – Anglican Church Diocese of Sydney Safe Ministry Representative – Safe Ministry Check – Pastoral Guidelines

Legislation & Additional Frameworks

- [Child Protection \(Working with Children\) Act 2012 No 51 - NSW Legislation](#) - <https://legislation.nsw.gov.au/view/html/inforce/current/act-2012-051>
- [The 4R's of Safeguarding Children \(Refresher\)](#) - https://www.communitylanguages.org.au/Child_Safe_Standards/2024/4Rs-of-Safeguarding-Children-Refresher-Update.pdf
- [A Mandatory Reporter's Guide To Selecting A Decision Tree](#)
- [Churches & Religious Organisations | ChildSafe Australia](#) - <https://www.childsafe.org.au/industry-sectors/churches-and-religious-organisations/>
- [Creating Safe Spaces Training & Resources](#) - <https://creatingsafespaces.org.au/>



Policy Review

This Policy shall be reviewed every 3 years or in the event that any information arising that would demonstrate the need for a review or resulting from any legislative or church change that would warrant a review.

Version	1.0
Children Safety/Protection Officers	
Senior Pastor	
Responsible Officer	
Approval Date	1 st June 2026
Approved by	Senior Pastor in conjunction with the Eldership
Effective Date	1 st July 2026
Next Review Date	1 st June 2029



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