

Safeguarding Children Policy Template

Version 3.0 – 28 November 2023

Proposed policy revision proposed for endorsement at the NCC meeting on 28th November 2023

The New South Wales Christadelphian Committee (NCC) is defined in Appendix A: Definitions.

The NCC conducts a range of activities that include children. This means that, from time to time, individuals, other than the parents of the children engaged in an activity, will have the responsibility for their supervision and welfare. During these activities, the NCC has a duty to protect children against possible abuse and improper or inappropriate behaviour.

This document provides guidance for those engaged in any activity conducted by the NCC where children are involved. It also provides guidance for victims of abuse, those related to victims of abuse, and guidance for perpetrators of abuse.

The policy is based on the ACEE Safeguarding Children Policy Template 2023. It can be found at:

- [Safeguarding Children Policy Template \(acee.info\)](https://www.acee.info/safeguarding-children-policy-template)

The register of Ecclesial Members who have WWC approval is kept by the NCC Secretary.

This policy will be reviewed in 2024 annual, as per requirement in 9.1.a below.

NCC

November 2023

AACE Template CSP Version 6.1 NSW EDITION

Provided by the

Association of Australian Christadelphian Ecclesias Inc

Email: secretary@acee.info

This document reflects the Safeguarding Children template as provided by the Association of Australian Christadelphian Ecclesias (ACEE) as a suggested basis for the formulation of such a Policy by each Australian Ecclesia, except those in the ACT and Tasmania.

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1. Introduction

- 1.1. Our New South Wales NCC community Statement of Commitment to Child Safety is as follows:
The NCC is committed to the safety and wellbeing of all children and young people. We are committed to providing a child-safe and child-friendly environment, where children and young people are safe and feel safe and can actively participate in decisions that affect their lives. We have zero tolerance for child abuse and other harm, and we are committed to acting in children's best interests and keeping them safe from harm.
- 1.2. Children are a heritage from the Lord (Psalm 127:3) and should be cherished and nurtured by families and the Ecclesia. Table 1 lists Bible passages that provide a clear foundation for this Policy.
- 1.3. The NCC acknowledges the responsibility for NCC Committees, Ecclesias and families to work together to provide a harmonious environment for children which respects their rights, safety, and wellbeing.
- 1.4. Everyone in the NCC is responsible for the care and protection of children. It is everyone's responsibility to report information about abuse or harm to children within the Ecclesia.
- 1.5. The safety and wellbeing of children is of paramount importance to the NCC community.
- 1.6. [Appendix A](#) defines terms used in this Policy.

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

Bible Teaching	References
The Bible teaches that children are God's heritage.	Matthew 19:14; Psalm 127:3
The Bible teaches that we should "do all to the glory of God". This provides the over-arching principle and guide for planning, managing, and deciding all matters within the Ecclesia.	1 Corinthians 10:31
The Bible teaches that we should practise the commandments of Christ and strive to develop the fruit of the spirit.	John 14:15; 15:14; Galatians 5:22-24; Ephesians 4:17-20; Philippians 4:8
The Bible teaches that we are to be holy and to abstain from all appearance of evil.	1 Peter 1:15-16; 1 Thessalonians 5:22
The Bible teaches that all forms of abuse, including child abuse, violate the commandments of Christ and are contrary to the fruit of the spirit.	Galatians 5:19-21; Ephesians 5:3-12; 1 Corinthians 6:9-10
The Bible teaches that we are to love God with all our heart, soul, mind, and strength and to love our neighbour as our selves.	Deuteronomy 6:4-5; Leviticus 19:18; Matthew 19:19; 22:37-39; Mark 12:29-31; Luke 10:27; Romans 13:9; Galatians 5:14; James 2:8
The Bible teaches that those who oversee the NCC are responsible to care for it and protect the 'flock' from 'wolves'.	Acts 20:28-32

2. Emergency Contacts

Table 2: Emergency Contacts

Police	If any person believes a child is at immediate risk of abuse or harm, contact the Police, on 000 .
	131 444 (the National Police Assistance Line for all non-emergency related matters)
Child Protection Service	Call the Child Protection Helpline on 13 21 11
The Ecclesia's Safeguarding Representative	<i>The NCC Safeguarding Representative or else the NCC Secretary</i>

3. Scope

- 3.1. This Policy applies to all NCC Members and Ecclesias as well as non-Members. This includes the NCC Management Committee members, their Ecclesias, children, parent/caregivers, families, employees, contractors, and volunteers that are involved or engaged in an activity of the NCC.
- 3.2. This Policy extends to all activities of the NCC's work including within the NCC's physical and online (virtual) environments.

4. Aim

- 4.1. This Policy aims to:
- (a) Prevent the abuse of children from occurring at activities under the auspices of the NCC (hereinafter called "NCC activities");
 - (b) Work towards an organisational culture of safeguarding children;
 - (c) Ensure that all attendees at NCC activities are aware of their responsibilities for identifying possible risks of harm and abuse to children.
 - (d) Establish controls and procedures for preventing abuse and/or detecting abuse when it occurs;
 - (e) Provide guidance on actions that should be taken where there is suspected abuse against any child at NCC activities;
 - (f) Provide a clear statement to everyone forbidding abuse against a child; and
 - (g) Provide assurance that any, and all, suspected abuse will be reported and fully investigated.
 - (h) Provide clear requirements for:
 - The safety and wellbeing of children at NCC activities, and
 - The management of complaints.
 - (i) Provide a framework for:
 - Supporting victims of abuse and their families, and
 - Appropriately managing alleged or convicted offenders and perpetrators; and
 - (j) Demonstrate compliance with key child safety laws as relevant to the State or Territory of operation.

5. Principles

5.1. The NCC affirms these principles which are the basis of this Policy:

- (a) The NCC has zero tolerance for all forms of abuse against children.
- (b) The safety and wellbeing of children at NCC activities is of paramount importance.
- (c) Child abuse violates Bible teaching (refer to [Section 1](#)) and is defined by law as criminal behaviour. The NCC does not tolerate or condone criminal behaviour.
- (d) Protection of children is a shared responsibility amongst NCC Members and non-Members.
- (e) All children have a right to feel safe and be safe, and every person has an equal right to protection from abuse.
- (f) The NCC will be sensitive, compassionate, objective, confidential, fair, truthful, and compliant in any matter related to the abuse of a child, alleged, or proven.
- (g) The NCC will provide support and assistance to people affected by abuse, alleged or proven.
- (h) The NCC supports the National Principles for Child Safe Organisations (NP) which are based on the Child Safe Standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse¹. The requirements in [Appendix B](#) are grouped under sub-headings which relate to each of the National Principles.

6. Responsibilities

6.1. The NCC Committee

6.1.1. The NCC has the primary responsibility for the care and safety of children at NCC activities.

6.1.2. The NCC must:

- a) Implement safeguarding policies and procedures to promote the safety of children (in accordance with State and Territory legal obligations, and insurance requirements);
- b) Provide leadership in child safety;
- c) Communicate the requirements of this Policy to NCC Members and non-Members;
- d) Ensure NCC Members and non-Members involved with the care and supervision of children are suitable and supported;
- e) List Safeguarding Children as a standing agenda item at NCC Committee meetings;
- f) Ensure child safety is discussed at all pertinent meetings with Activity Coordinators, Youth Workers and other NCC Members and non-Members delivering services to children;
- g) Ensure safeguarding complaints are managed appropriately and in accordance with the law;
- h) Provide support to the NCC's Safeguarding Representative in responding to and handling complaints involving children;
- i) Implement risk management strategies to minimise risks of abuse to children (refer to [Appendix I](#));
- j) Conduct regular review of this Policy; and
- k) Ensure the NCC is compliant with its record keeping responsibilities in accordance with Section 7 of this Policy.

6.1.3. The NCC may appoint a person or persons to be the Ecclesia's Safeguarding Representative/s

¹ Royal Commission into Institutional Responses to Child Sexual Abuse: *Making Institutions Child Safe: Vol 6, 2017, p 413.*

to coordinate administrative requirements of this Policy under their direction. The NCC is responsible for the functions outlined in Section 6.2 if it does not appoint a Safeguarding Representative.

6.2. NCC's Safeguarding Representative

6.2.1. The NCC's Safeguarding Representative is a person or persons appointed by the NCC.

Note: The NCC's Safeguarding Representative does not carry sole responsibility for safeguarding children. NCC Members and non-Members have a shared responsibility for safeguarding children as defined in Sections 4 and 5 of this Policy.

6.2.2. The NCC's Safeguarding Representative is responsible for:

- a) Coordinating the administrative requirements of this Policy
- b) Responding to, handling, and managing complaints relating to the safety of children;
- c) Escalating child safety complaints to the appropriate authorities, with support from the NCC's Committee, and in accordance with the Child Safety Complaints Handling Procedure (refer to [Appendix F](#));
- d) Overseeing the investigation process for child safety complaints;
- e) Providing support to anyone (child, parent or individual) who reports a safeguarding matter; and;
- f) Communicating with affected parties involved in the complaint such as the child, the parents/caregivers of the affected child, or the affected individual and their family.

6.2.3. The NCC's Safeguarding Representative must:

- a) Understand the child safety laws and procedures outlined at [Appendix K](#) as relevant to the NCC's State or Territory of operation;
- b) Understand the requirements and processes for Working with Children Checks (or the equivalent check in the NCC's State or Territory of operation);
- c) Facilitate Working with Children Checks (or the equivalent) on behalf of the NCC;
- d) Maintain records of Working with Children Checks on behalf of the NCC in accordance with the legislative requirements, as relevant to the NCC's State or Territory of operation (refer to [Appendix K](#));
- e) Coordinate Child Safe Training for persons engaged by the NCC to work with children (at least on an annual basis as per the State or Territory requirements); and
- f) Advise the NCC if / when they become aware of changes in law or associated processes which may require a revision to this Policy.

6.3. Activity Coordinators

6.3.1. An Activity Coordinator is a person appointed by the NCC to coordinate an activity of the NCC.

6.3.2. For the activity they have been requested to coordinate, an Activity Coordinator must:

- a) Ensure persons working with children have Working with Children Checks (or equivalent in the State or Territory in which the NCC is located);
- b) Develop and implement activity guidelines which identify risks to children and include appropriate risk management strategies; and
- c) Report to the appropriate authorities (refer [Appendix K](#)) if they have a reasonable belief that a child has been, is being, or is at risk of being abused.

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

6.4. Youth Workers

6.4.1. A Youth Worker is an adult person appointed by the NCC to coordinate an activity of the NCC.

Note: A Youth Worker may be a Member of an Ecclesia, an employee, contractor, or volunteer.

6.4.2. Youth Workers must:

- a) Comply with the standards of behaviour for interactions with children defined in the NCC's Child Safeguarding Code of Conduct (refer to [Appendix D](#));
- b) Be vigilant to signs of harm in children;
- c) Routinely check in on a child if they notice a possible sign of harm or if they have a concern for the child's safety or wellbeing;
- d) Maintain a current Working with Children Check;
- e) Attend regular Child Safety Training organised by the NCC (at least on an annual basis or as per State or Territory requirements);
- f) Follow child safeguarding policies, procedures, and activity guidelines that have been established for the activity; and
- g) Report to the appropriate authorities (refer to [Appendix K](#)) if they have a reasonable belief that a child has been, is being, or is at risk of being abused.

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

6.5. NCC Members

6.5.1. All Members of the NCC, including those listed in Sections 6.1 to 6.4. above, must:

- a) Comply with the standards of behaviour for interactions with children defined in the NCC's Child Safeguarding Code of Conduct (refer to [Appendix D](#));
- b) Comply with the requirements of this Policy;
- c) Provide a safe environment for all children;
- d) Not spend time alone with a child if not the child's parent/caregiver; and

Notes: When working with children, an NCC Member should always be in the presence of at least one other adult Ecclesial Member who is approved to work with children;

The NCC should make appropriate arrangements for parents/caregivers to be able to provide care to young children.

In developing activity guidelines Activity Coordinators should consider and document what is, and is not, appropriate time with a child. For example:

- *Appropriate – a youth group host may have a private conversation with a child in a room where at least 1 other Ecclesial Member or non-Member, who has been approved by the NCC to work with children, is present.*
 - *Inappropriate – a person is alone with a child in their room at night at a campsite with the door closed.*
- e) Report to the appropriate authorities (refer to [Appendix K](#)) if they have a reasonable belief that a child has been, is being, or is at risk of being abused; and

6.5.2. During NCC activities, all adult Members of an Ecclesia, including those listed in 6.1 to 4 above,

must:

- a) Always promote the safety of children;
- b) Assess the risk of abuse to children within their area of responsibility and eradicate / minimise any risk to the extent possible; and
- c) Facilitate the reporting of any concerns regarding the safety of children to the coordinator of the activity or the NCC's Safeguarding Representative.

6.6. Employees, Contractors, and Volunteers (non-Members)

6.6.1. Employees, contractors, and volunteers who are not Members of the NCC, but are engaged by the NCC, must:

- a) Comply with the standards of behaviour for interactions with children defined in the NCC's Child Safeguarding Code of Conduct (refer to [Appendix D](#));
- b) Maintain a current Working with Children Check if engaging in work with children;
- c) Comply with the requirements of this Policy;
- d) Report to the appropriate authorities (refer to [Appendix K](#)) if they have a reasonable belief that a child has been, is being, or is at risk of being abused.

7. Record Keeping

7.1. The NCC must complete and keep accurate records of:

- a) All child safety incidents for a minimum of 10 years; and
- b) Serious allegations of abuse for a period of 45 years.

7.2. The NCC must ensure that records are:

- a) Dealt with in accordance with the relevant law such as the Privacy Act 1988 (Cth)²;
- b) Maintained appropriately in a clear, logical, and secure manner;
- c) Preserved in a suitable physical and/or digital environment that ensures records are not subject to degradation, loss, alteration, corruption, or deletion;
- d) Available for individuals who have a right to access records which contain their personal information;
- e) Stored securely in a locked filing cabinet (physical records) or stored in a password-protected file (digital records); and
- f) Destroyed, de-identified and disposed of in accordance with legal requirements.

7.3. The NCC ensures that all NCC Members and non-Members are aware of and understand their rights regarding the collection of data, information sharing, and record keeping.

² See page 320 Commonwealth [Privacy Act 1988](#)

8. Breaches of this Policy

- 8.1. The NCC responds promptly to all breaches and manages the process in a fair, unbiased, and supportive manner.
- 8.2. Depending on the nature of the breach, the NCC may take the following actions:
 - a) Conduct mediation between the parties involved in the incident (where appropriate);
 - b) Provide specific education and training to NCC Members and non-Members with emphasis on the relevant component of this Policy that was the subject of the breach;
 - c) Restriction of a person's duties, if the person involved in the breach was carrying out work or volunteering with the NCC;
 - d) Providing closer supervision; and/or
 - e) Review of current policies and procedures, with updates and developments if necessary.
- 8.3. Any breach of this Policy may result in disciplinary action, including but not limited to the suspension or termination of engagement or employment with the NCC.
- 8.4. The details of the breach will be documented, recorded, and kept confidential (unless the NCC is required to disclose by law).

9. Related Policies and Procedures

- 9.1. This Policy should be read in conjunction with the following related documents:
 - a) NCC Privacy Policy - <https://www.christadelphiansaustralia.org.au/ncc/privacypolicy.html>
 - b) Risk Management Policy - https://drive.google.com/file/d/1-sTwfcmWN16vIL_ouO4b2aC8uS_RIHN/view?usp=drive_link
 - c) Critical Incident Management Policy - https://drive.google.com/file/d/1zFjk3ohLgZy9P5PGPoaiobx_CdyNeVrh/view?usp=drive_link

10. Revision History

- 10.1. Note: this is the revision history of the NCC policy document incorporating also the revision history of the AACE provided templates.

Table 3: Document Revision History

Version	Change Details	Date of Issue
1.0	AACE Initial publication	1998
2.0	AACE Revision	Circa 2002
3.0	AACE Revision	March 2010
	AACE (reformatted without content revision)	October 2014
4.0	<ul style="list-style-type: none"> AACE Policy renamed. AACE General revision for alignment with the Child Safe Standards and recommendations for religious institutions in the final report of the Royal Commission into Institutional Responses to Child Sexual Abuse. 	August 2019
1.0	Original adoption of policy at the NCC Meeting	25 February 2020
5.0	<ul style="list-style-type: none"> AACE Updated for changes in legislation in accordance with legal advice 	March 2021
1.1	Review by NCC Policy updated to meet NSW legislation changes	July 2021- February 2022
2.0	NCC Endorsement Policy revision adopted at the NCC Meeting	22 February 2022
6.0	<ul style="list-style-type: none"> AACE Policy renamed. AACE Updated for changes in legislation in accordance with legal advice 	March 2023
6.1	<ul style="list-style-type: none"> AACE Final policy template confirmed for distribution to ecclesias 	Sept 2023
3.0	Review by NCC based on a revised AACE policy template	28 November 2023
Next	Next review is due	November 2024

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Appendix A: Definitions

- A.1. Terms used in the Policy have the meaning given in Table 5.
- A.2. Definitions which include '(Source: RCIRCSA)' are as given in the glossary in the final report of the Royal Commission into Institutional Responses to Child Sexual Abuse.³
- A.3. Definitions which include '(Source: AIFS)' are as given by the Australian Institute of Family Studies.⁴
- A.4. Sources for other definitions are as given.

Table 5: Definitions

Term	Definition (Source)
Activity Coordinator	A person appointed by the NCC to coordinate an NCC activity.
activity of the NCC (NCC activity)	An event that is organised, sponsored and/or advertised by the NCC. The event may be at an Ecclesial hall or a hired venue. An NCC activity also includes those occurring on the online environment.
adult	A person who is 18 years of age or older.
appropriate authorities	Government agencies authorised by law to receive, investigate, and respond to complaints of child abuse and/or have a responsibility for child safety.
breach	An action – or inaction – by a person which does not comply with this Policy.
caregiver	See 'parent / caregiver'
child	A human being below the age of 18 years unless, under the law applicable to the child, majority is attained earlier. (Source: UN Convention on the Rights of the Child) ⁵
child abuse	Refers to acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. The forms of child abuse are sexual abuse (including grooming), emotional abuse, neglect, physical abuse, and exposure to family violence. ⁶ Refer to Appendix C for definitions, examples, and possible signs of each form of abuse. (Source: AIFS)

³ Royal Commission into Institutional Responses to Child Sexual Abuse, *Our Inquiry: Vol 1*, 2017, p 319.

⁴ Australian Institute of Family Studies, *What is Child Abuse and Neglect?*, 2018, <https://aifs.gov.au/resources/Policy-and-practice-papers/what-child-abuse-and-neglect>.

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

⁶ Australian Institute of Family Studies, *What is Child Abuse and Neglect* (2018), <https://aifs.gov.au/cfca/publications/what-child-abuse-and-neglect>.

Term	Definition (Source)
Complaint	<p>Includes any allegation, suspicion, concern, or report of a breach of this Policy or the NCC's code of conduct. It also includes disclosures made to the NCC that may be about or relate to child abuse in an NCC environment.</p> <p>The NCC may receive a complaint:</p> <ul style="list-style-type: none"> • Directly or through a redress scheme (should one exist); • From anyone – a child, adult survivor, parent, trusted adult, independent support person, employee, volunteer or community Member; • About an adult allegedly perpetrating child abuse or about a child exhibiting harmful behaviours; or • In writing, verbally or as a result of other observations, including behavioural signs. <p>A complaint may become a 'report' to an external authority or agency. (Source: RCIRCSA, with 'institution' replaced by 'Ecclesia')</p>
Disclosure	<p>A process by which a child conveys or attempts to convey that they are being or have been abused, or by which an adult conveys or attempts to convey that they were abused as a child.</p> <p>This may take many forms and might be verbal or non-verbal. Non-verbal disclosures using painting or drawing, gesticulating, or through behavioural changes, are more common among young children and children with cognitive or communication impairments. Children, in particular, may also seek to disclose abuse through emotional or behavioural cues, such as heightened anxiety, withdrawal, aggression or inappropriate behaviour.</p> <p>Disclosures can be intentional or accidental, and they might be prompted by questions from another person or triggered by a memory of the abuse. A disclosure may also become a 'complaint' when made to the NCC or a 'report' when made to an external authority or agency. (Source: RCIRCSA, with 'institution' replaced by 'Ecclesia')</p>
employee (employed)	<p>A person appointed or contracted by the NCC to perform a function, whether in a paid or voluntary capacity. They may or may not be a Member of the NCC or an NCC affiliated Ecclesia.</p>
Harm	<p>A detrimental effect to a child safety or wellbeing caused by abuse.</p>
Law	<p>The law of the Commonwealth of Australia or of a State or Territory. (Source: RCIRCSA)</p>
Legislation	<p>Acts and regulations. (Source: RCIRCSA)</p>
NCC environment	<p>The environment in which activities of the NCC take place. It includes both the physical and online environments.</p>
NCC	<p>This is to be understood as the Management Committee made up by the member Ecclesial Secretary / Recorders as well as an NCC Sub Committee Secretary or Co-ordinators.</p> <p>A group of NCC affiliated Ecclesial Members appointed by the NCC to oversee and manage its affairs or to organise NCC activities and events.</p>

Term	Definition (Source)
mandatory reporting	Refers to the legislative requirement of an individual of a certain profession, to make a report to Child Protection Authorities, if they form a reasonable belief that a child has experienced or is at risk of experiencing child abuse. There are differences in mandatory reporting requirements across the States and Territories, Ecclesias should refer to Appendix K for guidance. (Source: AIFS)
Member	A person listed as an active / affiliated member of the NCC or Members of an NCC affiliated Ecclesia. A Member can also be engaged by the NCC as an employee.
non-Member	Employees, contractors, and volunteers who are not Members of the NCC or Members of an affiliated NCC Ecclesia, but are engaged by the NCC.
offender	A person who is found by a court to have done something that is prohibited by law. (Source: RCIRCSA)
parent / caregiver	The child's mother, father, or someone else having or exercising parental responsibility for the child (e.g. a child's grandparents, aunty, or uncle). A parent of an Aboriginal or Torres Strait Islander child includes a person who under Aboriginal or Islander custom is regarded as a parent of the child.
perpetrator	A person who has abused a child. (Source: RCIRCSA)
reasonable belief	Facts or evidence which would lead a reasonable person to think that there is a risk of harm to a child based upon indicators such as those outlined in Appendix C . It does not require certainty, but it should be more than suspicion (i.e. the individual has some objective basis for the belief).
record	Information created, received, and maintained as evidence and/or as an asset by an organisation or person, in pursuance of legal obligations or in the transaction of business or for its purposes, regardless of medium, form or format. (Source: RCIRCSA)
report	Where concerns relating to child abuse are notified to an authority or agency external to the NCC – for example, where a person or institution notifies the police, a child protection agency, an oversight agency or a professional or registration authority. (Source: RCIRCSA, with 'institution' replaced by 'Ecclesia')
reportable conduct	Conduct that must be reported under legislation that obliges designated institutions to report allegations of reportable conduct to an independent statutory body. (Source: RCIRCSA)
Reportable Conduct Scheme	A scheme established under legislation by a State or Territory to monitor, investigate and report on reportable conduct.
risk of harm	Circumstance where there is a likelihood of harm to a child.

Term	Definition (Source)
secondary victim	People who are affected by the abuse perpetrated against the primary victim (the child who is abused). Secondary victims can include partners, children (including children born as a result of the abuse), parents, siblings, and extended family. Trauma impacts can extend across generations and there may also be collective trauma impacts for whole communities or populations. The impacts of abuse can also be felt by a wider range of people, including whistleblowers and other people (including other children) within the institution where the abuse occurred. (Source: RCIRCSA)
Secretary	The Member of the NCC appointed by the NCC Management Committee to coordinate NCC administration. Alternatively it a Member of an Ecclesia that is coordinating an NCC Committee / Sub Committee.
sexual offending	Sexual behaviours that fall within the definition of a sexual offence under Australian law, where the person could be held criminally responsible for their conduct. (Source: RCIRCSA)
training	Provision for those engaged with children in activities organised or conducted under the auspices of the NCC to understand their responsibilities under this Policy.
Unity Basis	<i>Unity in Australia: The Accepted Basis</i> , ⁷ the basis upon which Christadelphian Ecclesias in the Central Fellowship in Australia agree to relate to each other and conduct some of their affairs.
Working with Children Check	A Working with Children Check (WWCC) is a background check for people seeking to engage in child-related work. It aims to prevent people from working or volunteering with children if records indicate that they may pose an unacceptable level of risk to children. ⁸ Each State and Territory has its own WWCC scheme, see Appendix K: Child Safety Procedures for specific State requirements.
work or working with children	Is any role or function which involves contact with children, including care, supervision, and teaching.
youth (young person)	A teenager who is a child. <i>Note: This term is used in recognition that a teenager may not identify as being a 'child' (notwithstanding the definition).</i>
Youth Worker	An adult who has volunteered or has been appointed to teach, lead, supervise or work with children or youth.

⁷ *Unity in Australia: The Accepted Basis*, with special reference to the work of the late Brother John Carter towards reunion in 1958. First Edited and Published by the Australian Christadelphian Central Standing Committee 1963. Reprinted by the Australian Christadelphian Committee 1999. Reprinted by the Association of Australian Christadelphian Ecclesias 2010.

⁸ Royal Commission into Institutional Responses to Child Sexual Abuse, *Working with Children Checks Report*, 2015, p 3.

Appendix B: Implementing the National Principles for Child Safe Organisations

Note: Subheadings NP 1 to NP 10 each relate to one of the 10 National Principles (NP) for Child Safe Organisations.⁹

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

- 1.1. The NCC has a Statement of Commitment to Child Safety and makes it publicly available online e.g. on the Ecclesia's website and on-site at the Ecclesia's Hall (where possible).
- 1.2. The NCC has a Child Safeguarding Code of Conduct which includes expected standards of behaviour when interacting with children (refer to [Appendix D](#) for guidance).
- 1.3. The NCC Management Committee reviews and approves nominations for any person whose role or function may involve working with children including:
 - a) Secretary;
 - b) Youth Workers, supervisors and youth leaders; and
 - c) Visiting speakers / study leaders (such as for camps, study weeks, special events, or fraternal gatherings) and supervisors of outings.
 - d) Coordinating and managing an NCC Committee / Sub Committee.
- 1.4. The NCC Management Committee provides sufficient oversight of NCC activities to ensure that child safety risk management approaches are effective in minimising risks of abuse to children.
- 1.5. The NCC Management Committee regularly promotes information about child safety and ensures it is accessible to NCC Members and non-Members. Promotional strategies include through the NCC website, newsletters, emails, flyers, posters, and/or brochures.
- 1.6. The NCC Management Committee offers appropriate support to anyone implementing any aspect of this Policy while acting on behalf of the NCC.

Note: This may include counselling services following a disclosure by a child.

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

- 2.1. The NCC recognises the importance of empowering children and engages them through age-appropriate processes designed to promote their safety.
- 2.2. The NCC Management Committee endeavours to implement age-appropriate strategies to proactively:
 - a) Engage with children;
 - b) Seek children's views;
 - c) Consult with children about decisions that affect them;
 - d) Educate and inform children on the following key areas:
 - Safe and respectful relationships;
 - Their rights to be safe from abuse; and
 - What is and isn't appropriate behaviour towards them from both peers and adults.
 - e) Consult with children about what makes them feel safe and how this can be recognised and implemented at NCC activities.

⁹ Australian Human Rights Commission, *National Principles for Child Safe Organisations*, (2018), <https://childsafe.humanrights.gov.au/national-principles>

- 2.3. Examples of age-appropriate strategies for engaging with children at NCC activities include:
- a) Group discussions;
 - b) Activities that promote teamwork;
 - c) Feedback surveys;
 - d) Child-friendly feedback forms;
 - e) Child-friendly complaint forms; and
 - f) Child-friendly suggestion box made available at NCC activities.
- 2.4. The NCC Management Committee and/or Safeguarding Representative informs children of where they can go if they have any concerns or would like further information and support.

Notes: The NCC Management Committee / Safeguarding Representative / NCC Sub Committee Secretaries and Coordinators should discuss with Youth Workers and other people with experience in working with children how best to convey this information.

Information should be provided in a way that is appropriate to the child's age, ability and understanding.

Children should be encouraged to discuss and ask questions to confirm their understanding and be made to feel confident that their concerns about safety or wellbeing will be taken seriously and responded to immediately.

The NCC should openly display contact details for helpline services and explain their use to children. Referral and support services may include Kids Helpline, Reachout, Youth Beyond Blue, Headspace and Lifeline.

- 2.5. The Safeguarding Representative (and the NCC Management Committee) are responsible for providing support to children who are victims of abuse and their families, including through pastoral care and the provision of access to professional services.

NP 3: FAMILIES AND COMMUNITIES ARE INFORMED AND INVOLVED

- 3.1. The NCC Management Committee must inform anyone with a responsibility under this Policy:
- a) About the Policy;
 - b) About Policy requirements which specifically apply to that person's role or function; and
 - c) Make the Policy available to them.

Note: The NCC may make the Policy available to other parties at its discretion.

- 3.2. The Management Committee must:
- a) Inform all Members of the NCC and their families about this Policy and make it available to them;
 - b) Inform a new Member of the NCC and affiliated Ecclesias of this Policy and its requirements; and
 - c) Provide an opportunity for Members to share information about specific needs of family members joining the Ecclesia.
- 3.3. The NCC Management Committee supports families to take an active role in monitoring the safety of children across the NCC by clearly communicating the following key information:
- a) The NCC's child safeguarding policies, procedures, and practices
 - b) The child safety roles and responsibilities of NCC Committee / Sub Committee Secretaries and Coordinators

- c) The roles and responsibilities of persons delivering services directly to children; and
 - d) How, when and to whom complaints should be made.
- 3.4. The NCC Management Committee communicates child safety information to families on a regular basis. Strategies may include:
- a) information sessions
 - b) fact sheets
 - c) email communication
 - d) newsletters
 - e) social media
 - f) the NCC's website.
- 3.5. The NCC seeks feedback from parents / caregivers on the effectiveness of child safeguarding policies and procedures. Any person may provide feedback about the Policy to the NCC Management Committee to consider changes for further improving child safety.

NP 4: EQUITY IS UPHELD AND DIVERSE NEEDS ARE CONSIDERED

- 4.1. The NCC recognises and respects the diverse backgrounds, needs and preferences of children and their families.
- 4.2. The NCC acknowledges that each child and their family have their own unique identity shaped by personal characteristics, circumstances, life experiences, and backgrounds. Accordingly, the NCC recognises that the level of support required by each child and their family will vary.
- 4.3. The NCC understands barriers that may prevent children from disclosing abuse with particular attention to the following:
- a) Age
 - b) Cultural backgrounds
 - c) Cognitive capabilities
 - d) Communication needs
 - e) Impaired intellectual or physical functioning
 - f) Low levels of literacy or education.
- 4.4. The NCC Management Committee implements strategies to foster a culturally safe environment and to ensure the safe participation of children and their families who have diverse needs. Strategies may include:
- a) Providing children and their families with access to translation services (if needed) to raise concerns or report a complaint;
 - b) Providing accessible child safety information in key community languages;
 - c) Accessing cultural advice or disability support (where required); and
 - d) Delivering child safeguarding training to NCC Members and non-Members on how to respond to the diverse needs of children, and their families.
- 4.5. The NCC Management Committee offers appropriate support to an adult who alleges they were abused when a child. This may include assisting them to find appropriate professional counselling and encouraging them to make a report to appropriate authorities if appropriate.

NP 5: PEOPLE WORKING WITH CHILDREN ARE SUITABLE AND SUPPORTED

- 5.1. The NCC adopts stringent recruitment and screening measures when engaging or appointing individuals to work with children.
- 5.2. The NCC has implemented a Working with Children Recruitment Procedure, which must be followed:
- When approving nominations for NCC Members to work with children (such as Youth Workers, Youth Leaders)
 - When employing persons who are not Members of an Ecclesia.
- Note: The NCC should refer to [Appendix E: Working with Children Recruitment Procedure](#) for guidance.*
- 5.3. To work with children, an adult must have met the legal requirements to do so prior to commencing this work.
- A Working with Children Check (or equivalent) must be obtained.
 - If the person has a Working with Children Check (or equivalent) associated with another organisation, it must also be associated with the NCC or an NCC Sub Committee.
 - A person who is exempt by law from a Working with Children Check (or equivalent) because of their profession or occupation may still require a Working with Children Check if their involvement with children at NCC activities is unrelated to their profession or occupation.
- Note The NCC should refer to [Appendix K](#) for Working with Children Check (or equivalent) requirements in their State or Territory of operation.*
- Working with Children Checks are not transferrable between States and Territories. A person with a Working with Children Check from another State or Territory must apply for a Working with Children Check in the Ecclesia's State or Territory of operation.*
- 5.4. The NCC may request the applicant to sign an authority allowing the NCC to conduct a search to determine whether the applicant has a criminal record and have conducted this search or any other search as required by legislation.
- 5.5. An adult who works with children must advise the NCC Management Committee:
- Whenever they apply to associate their Working with Children Check with another organisation;
- Note: Paragraph a) may be deleted if it is not a requirement in the State or Territory in which your NCC is located.*
- If they have a complaint made against them (whether related to activities of the NCC or not); and/or
 - If their Working with Children Check (whether associated with the NCC or not) is withdrawn, suspended, cancelled, or lapsed.
- 5.6. An adult must not work with children:
- If they have been a Member of the NCC for less than three months unless otherwise approved by the NCC Management Committee or NCC Sub Committee;
 - If they are the subject of an unresolved complaint;
 - If the NCC Management Committee have directed their contact with children must be restricted at the NCC's activities; or
 - If they have prior convictions of violent crimes or sexually related offences.
- Notes: Paragraph b) does not apply to complaints which have been dismissed or disproved. Paragraph d) applies even when the sentence for a conviction has been served.*

- 5.7. The NCC must maintain a register of the status of Working with Children Checks for individuals associated with the NCC (refer to [Appendix K](#) for requirements relevant to the State or Territory in which the NCC is located).

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

- 6.1. The NCC responds to concerns relating to the safety of children promptly and treats all complaints seriously, respectfully, and sensitively. All child safety complaints are dealt with in accordance with the process outlined in [Appendix F](#).
- 6.2. The NCC has implemented the Child Safety Complaint Handling Flowchart (refer to Appendix G) to provide guidance on the handling of child safety complaints.

Notes: The NCC should adapt [Appendix G](#) to:

- *Suit the legislative requirements of the NCC's State or Territory of operation (refer to [Appendix K](#)).*

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

- 7.1. The NCC Management Committee ensures any person whose role or function may involve working with children receives training on this Policy:
- a) Upon appointment; and
 - b) At least annually thereafter during the period of their tenure.
- 7.2. Training provides persons with a clear understanding of Policy requirements, including:
- a) Expected standards of behaviour for interactions with children;
 - b) Child rights, including how to empower children and support their participation;
 - c) Child-friendly ways for children to communicate and raise their concerns;
 - d) Recognising possible physical and behavioural signs of child abuse (refer to [Appendix C](#));
 - e) Identifying inappropriate behaviour which may be a precursor to child abuse, including grooming;
 - f) Catering to children and families who have diverse needs;
 - g) Identifying and managing risks to children at risk; and
 - h) How to make a child safety complaint and to whom.
- 7.3. The NCC Management Committee provides NCC Members and non-Members involved in the care and supervision of children, with appropriate opportunities to develop practical skills in protecting children and responding to disclosures.
- 7.4. The NCC Management Committee ensures that training materials are regularly reviewed in response to emerging evidence of Best Practice.

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

- 8.1. The NCC has implemented a comprehensive risk management strategy that identifies and minimises potential risks to children involved in NCC activities.
- 8.2. The NCC adopts a Child Safe Situational Prevention Approach as part of its risk management strategy. Situational prevention aims to reduce the likelihood of inappropriate behaviour being carried out, by making systematic and permanent changes that:
- a) Increase the risks of perpetrators being caught; and
 - b) Make it harder for perpetrators to excuse or dismiss inappropriate behaviour.

Note: Guidance on Child Safe Situational Prevention Strategies is provided at [Appendix I](#).

8.3. Developing Activity Guidelines

- a) Activity Coordinators develop and implement activity guidelines for the NCC activity for which they are responsible, consistent with the NCC's overarching Risk Management Strategy.
- b) The NCC Management Committee or NCC Sub Committee Coordinators review and approve activity guidelines before an NCC activity starts.
- c) Activity Coordinators identify and assess risks to children and include in the activity guidelines processes and procedures for child safety, by:
 - Completing risk assessments relating to the safety of children prior to the commencement of an activity (refer to [Appendix J](#)); and
 - Addressing hazards in both physical and online environments (as relevant to the activity).
- d) When developing activity guidelines, Activity Coordinators consider:
 - Engaging with children, and their families about child safety practices to improve the effectiveness of the activity guidelines;
 - The diverse needs of children and including Aboriginal and Torres Strait Islander persons, persons with disability, and persons from Culturally and Linguistically Diverse backgrounds;
 - Encouraging friendships and support from peers to help children feel safe and be less isolated; and
 - If relevant to the activity, including controls or requirements relating to access / use of the online environment (internet, social media) by children.

8.4. The NCC implements the following safeguards to support the safety of children in connection with NCC activities:

- a) Persons who work with children must meet the child safety requirements outlined at [National Principle 5](#);
- b) At least two adults permitted to work with children must be present at all activities involving children (see the notes below); and
- c) Any discussion with a child in a private environment – including pre-baptismal instruction or an interview with a youth – must be conducted:
 - In the presence of at least two adult Members of the NCC approved to work with children;
 - Where the child is female, at least one of the adults must be an adult female Member of the NCC approved to work with children.

Notes: Where it is impractical to have at least two adults present, the NCC should consider what other minimum safeguards it will adopt, such as:

- *Individuals interacting with a child alone should keep a file note of the interaction and let the NCC Management Committee or NCC Sub Committee, and the child's parents / caregivers know this is going to occur where possible (or immediately after the interaction);*
 - *Obtain prior written permission from the parents / caregivers of the child;*
 - *Individuals must meet with the child in an open space where other Ecclesial Members or NCC Members who are approved to work with children are present.*
- The NCC Management Committee must reach out to the child after the meeting or activity to check in with the child.

- 8.5. Children must not have uncontrolled access to the online environment through a system provided by the NCC (as relevant to the activity or the circumstances surrounding the activity of the Ecclesia).
- 8.6. A Member must inform the NCC Management Committee or NCC Sub Committee if they become aware that a person attending an activity of the NCC is the subject of a complaint or has been convicted of sexual offending, or any form of abuse involving a child.

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

- 9.1. The NCC Management Committee reviews this Policy to ensure it remains compliant with the law and relevant to the developing needs of the NCC and the children participating in NCC activities. This Policy is reviewed:
 - a) Annually (or earlier if required due to changes in legislation); and
Note: State or Territory legislation may require more frequent reviews.
 - b) After every complaint of child abuse
- 9.2. After every complaint of child abuse or breach of this Policy, the Management Committee takes actions to prevent recurrence. Actions may include:
 - a) Seeking advice from the appropriate authorities or individuals with relevant professional expertise on child abuse and child safety
 - b) Reviewing this Policy;
 - c) Reviewing risk assessments and activity guidelines;
 - d) Providing closer supervision of persons or activities;
 - e) Further education and training;
 - f) Placing restrictions on a person's contact with children at activities of the Ecclesia;
 - g) Advising the appropriate authorities regarding a person's suitability to work with children and/or
 - h) Disciplinary procedures.
- 9.3. The NCC Management Committee implement regular internal and external audits to ensure the NCC's policies, procedures and practices are compliant with relevant safeguarding legislation and regulatory requirements in the NCC's State or Territory of operation as outlined in [Appendix K](#).

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

- 10.1. The NCC may implement any additional procedures to further support the safety and wellbeing of children, provided that they are consistent with this Policy and the law.
- 10.2. The NCC must make child safeguarding policies and procedures publicly available.
- 10.3. The NCC Management Committee maintains records of activity guidelines and associated risk assessments for a minimum of 10 years or as otherwise required by the NCC's Risk Management Strategy.

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

- C.1. Child abuse includes:
- (a) Any act committed against a child involving:
 - A sexual offence; or
 - Grooming.
 - (b) The infliction, on a child, of
 - Physical violence; or
 - Serious emotional or psychological harm.
 - (c) Serious neglect of a child
 - (d) Exposure to family violence.
- C.2. People in contact with children, and their families should be aware of the possible signs of child abuse.
- C.3. Sexual offenders exploit the dependency, vulnerability, and immaturity of children. They may use a range of tactics including force, threats, and tricks to engage children in sexual contact and to try to silence them. They may also try to gain the trust and friendship of parents or caregivers to obtain access to children. They may be family members or close family friends.
- C.4. There are two different signs of abuse:
- (a) **Physical Signs** are the injuries / visible harms that may occur as a result of abuse.
 - (b) **Behavioural Signs** are the actions, attitudes, and emotions of an individual that indicate abuse may have occurred.
- C.5. A person should not assess individual signs in isolation, rather signs should be looked at in the context of other potential signs and the personal circumstances or history of the child.
- C.6. The signs of abuse noted below are not exhaustive. The presence of these signs does not necessarily mean that abuse has been, or is, occurring.
- C.7. **Physical Abuse**

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

Unacceptable behaviour includes:

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

Table 6: Possible Signs of Physical Abuse

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

C.8. Sexual Abuse

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

Unacceptable behaviours include:

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

Table 7: Possible Signs of Sexual Abuse

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

C.9. Child Grooming

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

Table 8: Possible Grooming Strategies

Possible Grooming Strategies
<ul style="list-style-type: none"> • Offering a child gifts, money, attention, or affection with the intention of making it easier to access the child for sexual activity. • Spending inappropriate one-on-one time with a child. • Actively isolating children from other adults or children. • Violating personal boundaries in the context of intimate care. This includes bathing, toileting and changing clothes. • Insisting on physical affection with a child such as hugging, kissing, tickling even when a child does not appear to want it.¹⁰ • Sharing details with a child of personal sexual experiences. • Communicating privately with a child via social media. • Making close physical contact, like inappropriate tickling and ‘play’ wrestling. • Forming relationships with parents, guardians, and family members of children in order to build trust and ease their ability to access the child.

C.10. Emotional/Psychological Abuse

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

Unacceptable behaviour includes:

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

Table 9: Possible Signs of Emotional/Psychological Abuse

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

¹⁰ Tickling a child is strongly discouraged. If a child is being tickled and says to stop but tickling continues, it is preparing the child to accept they don’t have bodily autonomy and may not feel they can object to more serious behaviours.

C.11. Neglect

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

Unacceptable behaviour includes:

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

Table 10: Possible Signs of Neglect

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

C.12. Exposure to Family Violence

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

Examples include:

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

Table 11: Possible Signs of Exposure to Family Violence

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

Appendix D: Child Safeguarding Code of Conduct

- D.1.** This Code of Conduct outlines the behavioural expectations of NCC Members and non-Members when interacting with children. It is in place to protect children from harm and abuse when engaging in NCC activities.
- D.2.** This Code of Conduct applies to all NCC Members and non-Members who are involved or engaged in an activity of the NCC where they interact with children. NCC Members and non-Members are required to read and sign this Code of Conduct prior to working with children.
- D.3. Please note:** A child or young person is a person who is under the age of 18 years. In this Policy, reference to:
- a. Child also includes a young person.
 - b. Children also includes children and young people.

D.4. Safeguarding Responsibilities

1. Members and non-Members must:
 - a. Comply with the NCC's *Safeguarding Children Policy* and this Code of Conduct.
 - b. Report any concerns, allegations, or disclosures of abuse in accordance with the NCC's *Safeguarding Complaints Handling Procedure*.
 - c. Comply with NSW child safe legal obligations.
 - d. Report any breaches of the NCC's *Safeguarding Children Policy* or this Code of Conduct.
 - e. Ensure the parent/caregiver of a child is involved in all relevant decisions involving the child, including signing of documents or consent forms.
 - f. Always promote and monitor the safety of children.
 - g. Respect the individual needs and circumstances of children, and their families who have diverse needs. This includes, but is not limited to:
 - i. Children and families from Aboriginal and Torres Strait Islander backgrounds.
 - ii. Children and families from Culturally and Linguistically Diverse backgrounds.
 - iii. Those with a disability.
 - iv. Those who have experienced abuse or trauma.
 - v. Children with impaired intellectual or physical functioning.
 - vi. Children with low levels of literacy or education.

D.5. Professional Boundaries

1. Members and non-Members must:
 - a. Act in accordance with the scope of their role and the NCC activity that is being provided.
 - b. Respect boundaries and the privacy of children and their families.
 - c. Maintain a professional relationship with all Members (including children) if appointed to a role working or volunteering with the NCC. For example, a Member appointed to volunteer as a Youth Worker must adhere to the Child Safe Code of Conduct when interacting with children as part of their role.
 - d. Report to the NCC Management Committee if they become aware of a circumstance where a child requires support that is outside the scope of their role.
2. Members and non-Members must not:
 - a. Spend time alone with a child.
 - b. Develop close, personal, intimate, sexual, or 'special' relationships with a child associated with an NCC activity.

- c. Initiate, seek or request to contact a child outside of NCC activities without the explicit approval of the child's parents/guardians. For example, social functions, babysitting, sports coaching, or housesitting (unless a pre-existing relationship has been disclosed to the NCC Management Committee).
- d. Provide children with alcohol, drugs, tobacco (including vapour or any other nicotine-containing product), or pornography.
- e. Be under the influence of any alcohol, illicit drugs, medication, or fatigue that may affect capacity to perform their role.
- f. Allow bullying or inappropriate behaviour of children.
- g. Buy gifts or other items for children without authorisation from the NCC Management Committee and without the knowledge of parents / caregivers.
- h. Engage in any form of unlawful or sexual behaviour with a child, parent / caregiver associated with an NCC activity.
- i. Misuse power or authority to exploit, manipulate, abuse, or coerce a child to engage in sexual activity.
- j. Unlawfully discriminate against any child, or their family on the basis of gender, age, identity, culture, race, disability, sexual orientation, marital status, pregnancy, ethnic or national origin, physical or intellectual impairment, or gender identity.

Notes: The NCC is responsible to decide on a case-by-case basis whether a person has engaged in unlawful discrimination. The Sex Discrimination Act 1984 (Cth) includes an exemption (s 37) for religious bodies to discriminate on the basis of a person's sex, sexual orientation, gender identity, intersex status, marital or relationship status, in relation to:

- i. *the ordination or appointment of priests, ministers of religion or members of any religious order (including persons in training/education seeking the listed roles) the selection or appointment of persons to perform duties or functions for the purposes of or in connection with, or otherwise to participate in, any religious observance or practice; or*
- ii. *any other act or practice of a body established for religious purposes, that conforms to the doctrines, tenets or beliefs of that religion or is necessary to avoid injury to the religious susceptibilities of adherents of that religion.*

D.6. Communication

1. Members and non-Members must:

- a. Speak to children in a professional and supportive manner.
- b. Use positive language that creates an inclusive environment.
- c. Listen to and respect what children have to say.
- d. Encourage children to have positive friendships with other children and encourage them to support each other during NCC activities.
- e. Use the online environment in accordance with the *Safeguarding Children Policy* and this Code of Conduct.

2. Members and non-Members must not:

- a. Use abusive, derogatory, offensive, violent, culturally insensitive, or threatening language.
- b. Have open discussions about inappropriate adult themes in the presence of children.
- c. Single out a child in a humiliating manner.
- d. Use personal or private avenues to communicate with children without parental or caregiver knowledge. This includes (but is not limited to) befriending, following, tagging on social media, mobile phone, texting, or email communications.
- e. Use sexual language, comments, conversations, or communications with a child.
- f. Use a computer, mobile phone, camera, or other device to exploit or harass a child.

D.7. Supervision

1. Members and non-Members must:
 - a. Interact with children in areas with clear visibility. Ensure doors are open and windows are transparent as a minimum.
 - b. Ensure appropriate adult to children ratio requirements are adhered to when delivering NCC activities (appropriate ratios should be determined when developing activity guidelines).
 - c. Ensure third party contractors who may provide facilities or services are supervised by a Committee Member, or other authorised adult.

2. Members and non-Members must not:
 - k. Be in one-on-one situations with a child ie. work alone with children without having another adult present or being able to see them (see also D.9. Use of Bathrooms / Change Rooms).
 - a. Take a child or children into areas where they are not visible by another NCC Member or a non-Member who is authorised to work with children.
 - b. Take a child or children into rooms that can be locked.
 - c. Provide unauthorised transportation to a child.
 - d. Travel alone with a child except in the event of an emergency. In this circumstance, consent should be obtained from child's parent/caregiver or alternatively, a member of the Management Committee.

D.8. Physical Contact

1. Members and non-Members must:
 - a. Only use physical contact that is appropriate to the activity and if necessary (e.g. if it is required for the child's safety).
 - b. Seek consent from a child prior to using physical contact (if the contact is necessary). Ensure you explain to the child why the physical contact is required.
 - c. Respect and respond to signs that a child is uncomfortable with physical touch.
 - d. Use verbal directions rather than physical touch.
 - e. Ensure that any necessary physical contact is also culturally and religiously appropriate.
 - f. Use non-intrusive touch to comfort a child who is upset or to encourage a child to participate e.g. handshake or pat on the back / upper arm.

2. Members and non-Members must not:
 - a. Perform acts that are of a personal nature with a child, if they are capable of doing so themselves such as changing clothes and going to the bathroom.
 - b. Touch a child in areas of a sexual nature such as the breasts, buttocks, or genitals.
 - c. Initiate, permit, or request unacceptable physical contact with a child such as hugs, massages or kisses.
 - d. Use intrusive forms of discipline such as smacking, hitting, slapping, kicking.
 - e. Allow a child to smack or hit another child.
 - f. Facilitate situations which unnecessarily result in close physical contact with a child, such as tickling.
 - g. Threaten to hurt a child through words or gestures.
 - h. Use hostile force towards a child.

D.9. Use of Bathrooms / Change Rooms

1. Members and non-Members must:
 - a. Ensure adequate levels of supervision of children when using bathrooms. Where practicable, the child's parent / caregiver should accompany the child to the bathroom. If this is not practicable, then the child should be encouraged to self-manage (according to their age and ability).
 - b. Respect the child's right to privacy
 - c. Use the correct gender marked bathrooms at all times.
 - d. Knock and announce themselves prior to entering the bathroom for the purposes of supervision (if it is required, for example if using public bathrooms at an NCC activity or at overnight camps).
 - e. If possible, avoid using the bathrooms or changing areas when children are present.
 - f. Not enter the bathrooms of the opposite gender.
 - g. Not use photographic or video devices in toilets or changing areas. Cameras and mobile phones cannot be used in these areas.
 - h. Not allow a child to enter a public toilet alone when participating in an NCC activity/program.

D.10. Overnight Stays as part of an NCC activity

1. Members and non-Members must:
 - a. Receive written approval from the NCC Management Committee or NCC Sub Committee prior to commencement of an overnight stay.
 - b. Obtain written consent from the child's parents/caregivers prior to a child's participation in an overnight stay.
 - c. Inform parents/caregivers of sleeping arrangements prior to the commencement of any overnight stay.
 - d. Ensure children can contact their parents/caregivers if they feel unsafe, uncomfortable or have any concerns.
 - e. Ensure sleeping arrangements do not compromise the safety of children e.g. children sharing a bed with other children, or with another adult.
 - f. Ensure children are provided with privacy when changing or using the toilets.
2. Members and non-Members must not:
 - a. Be accommodated in the same room as a child during an NCC activity, unless it is the child of the adult (i.e. the child's parent) or if it is an authorised caregiver of the child.
 - b. Leave children unsupervised with unauthorised persons such as accommodation staff if an NCC activity is held at a camp.

D.11. Use of Photographic, Audio/Video Devices including mobile phones

1. Members and non-Members must:
 - a. Obtain informed consent from the child's parent/caregiver before taking photographs and videos of children.
 - b. Ensure the parent/caregiver is aware of how the NCC will use authorised photographs or videos.
 - c. Seek consent from the child and their parent/caregiver prior to posting a photograph or video on the online environment.

- d. Ensure photographs or videos taken do not include other children (who have not provided consent), especially where the individual can be identified.
 - e. Report inappropriate photography/videoing to the NCC Management Committee or NCC Sub Committee.
2. Members and non-Members must not:
- a. Use a computer, mobile phone, camera, or other device in a way that is inconsistent with the *Safeguarding Children Policy* or supporting procedures.
 - b. Share personal information, including photographs of children without the informed consent of the parent/caregiver.
 - c. Tag a child in a photograph on social media platforms such as Facebook.
 - d. Share explicit photographs of a child.
 - e. Expose children to inappropriate material that is not suitable to the age and developmental stage of the children present. Under no circumstances should children be exposed to pornographic material, e.g. through movies, the internet, television or games.
 - f. Possess or create child abuse material.

D.12. Breach of the Code of Conduct

Any Members and non-Members who engage in behaviour that is in breach of this Code of Conduct will be subject to disciplinary action. The NCC Management Committee or NCC Sub Committee promptly responds to all breaches, and will manage the process in a fair, unbiased, and supportive manner.

Depending on the nature of the breach, suitable actions may include:

- a. Referral to authorities and police if there are allegations of criminal behaviour.
- b. Emphasis on the relevant component of the *Code of Conduct* that was breached.
- c. Providing closer supervision to Members and non-Members.
- d. Providing specific education and training.
- e. Mediation between the parties involved in the incident (where appropriate).
- f. Disciplinary measures (if necessary).
- g. Review of current policies and procedures, with updates and developments if necessary.

D.13. Reporting a Breach of the Code of Conduct

All Members and non-Members who are involved or engaged in an NCC activity are encouraged to raise their concerns about a child's safety. If you have a concern or are aware of a breach of this Code of Conduct, you **must** report it to the Safeguarding Representative or a member of the NCC Management Committee or NCC Sub Committee.

Signed Acknowledgement

I have read and understand my responsibilities in accordance with this Code of Conduct. I understand that I will be subject to disciplinary action if I breach this Code of Conduct.

Signed

Date

Appendix E: Working with Children Recruitment Procedure

The NCC conducts rigorous recruitment, screening, and induction procedures for all individuals applying for positions which involve working with children as detailed in Table 12.

Table 12: Working with Children Recruitment Procedure

Stage	Description
1	<p>Employment advertisement packages / Application Forms include the following:</p> <ul style="list-style-type: none"> • The Ecclesia's Statement of Commitment to being a Child Safe Organisation • A link to the Ecclesia's <i>Safeguarding Children Policy</i> and <i>Child Safeguarding Code of Conduct</i>. • Selection Criteria – including key skills, attributes, experience, and attitudes to working with children. • Position Description – clearly identifying how the candidate will work with children and what their safeguarding responsibilities are (including reporting obligations). • A requirement to have a current Working with Children Check (WWCC) clearance (or the equivalent as relevant in the Ecclesia's State or Territory of operation).
2	<p>Screening procedures involve the following:</p> <ul style="list-style-type: none"> • Verification of the candidate's identity and qualifications. • Ensuring that candidates have suitable experience in working with children. • Thorough reference checks with at least two identified referees, including one referee from the candidate's most recent employer. • Verification by the NCC of WWCC clearances prior to commencement of work. • Recording the candidate's cleared WWCC number, the date of verification, its expiry date and renewal date in the WWCC register.
3	<p>The interview process involves the following:</p> <ul style="list-style-type: none"> • Providing clear information to candidates about the NCC's commitment to safeguarding children. • Questions to assess the values, motives and attitudes of candidates who will be working directly with children to determine whether they align with the NCC's Child Safety commitment. • Assessment of the candidate's professional / volunteer experience, qualifications, and competence to work with children. <p>The following questions may help in assessing the suitability of a candidate to work with children:</p> <ul style="list-style-type: none"> • Why have you applied for this position? • Why do you feel you are suitable for the role? • Please describe positive experiences you have had with children. • Have you ever been in a situation where you have disciplined a child, if so, how did you handle the situation? • Have you ever been investigated for a complaint involving a child and, if so, what were the circumstances?

	<ul style="list-style-type: none"> • Have you ever been convicted or investigated for sexual abuse, assault, or a sexual offence of any kind? • Is there any other information relating to your suitability for this position, that we should be aware of? • Have you read the <i>Safeguarding Children Policy</i> of the NCC and understood your responsibilities? <p>Do you have any further questions regarding the <i>Safeguarding Children Policy</i> or the associated procedures of the NCC?</p>
4	<p>Induction requirements are outlined below.</p> <p>All new Members and non-Members in roles working with children must:</p> <ul style="list-style-type: none"> • Undertake child safe induction prior to working with children. • Read and understand their obligations under the <i>Safeguarding Children Policy</i> and the <i>Child Safeguarding Code of Conduct</i>. • Completion of Child Safe Training.
5	<p>The Probation Period process includes the following:</p> <ul style="list-style-type: none"> • New employees are subject to an initial 3-month probationary period (if it is appropriate for their role). • A representative of the NCC Management Committee (or another nominated supervisor) will provide regular, ongoing feedback and support to the individual throughout the probation period. • Throughout and at the end of the probation period, the NCC Management Committee will ensure: <ul style="list-style-type: none"> ○ The individual is provided an opportunity to raise concerns formally or informally about harm or risk of harm to children. ○ The individual's adherence to the <i>Safeguarding Children Policy</i> and <i>Child Safeguarding Code of Conduct</i> is considered when assessing appropriateness for the role.

Appendix F: Child Safe Complaints Handling Procedure

Step 1: Identifying a Child Safety Complaint

(a) A complaint may include the following:

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

(b) Complaints relating to children may involve (refer to [Appendix C](#) for help in identifying the forms and possible signs of child abuse):

- Sexual abuse.
- Physical abuse.
- Emotional / Psychological abuse.
- Neglect.
- Exposure to family violence.

Step 2: Receiving a Complaint

When receiving a safeguarding complaint, the following process should be followed:

(a) Listen

When a child is making a disclosure, you should:

- Allow the child to use their own words.
- Consider whether the child's parent, guardian or carer should be present.
- Remain calm, patient and be supportive.
- Do not ask suggestive or leading questions.
- Do not interrogate the child. You should avoid asking too many questions that may overwhelm them.

(b) Reassure

Reassure the child that:

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

(c) Respect

- Respect that it may take the child time to disclose information.
- Explain what the next steps will be (using language appropriate to the child's age and capability).
- Avoid making promises that you cannot keep, for example that you will not tell anyone about what has happened.

- Ask the child what kind of support they would like from you or the NCC.

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

Step 3: Reporting a Child Safety Complaint

- If any person believes a child is at immediate risk of abuse or harm, or the complaint involves a serious criminal offence, contact the Police, on **000** (request an Ambulance if required).
- For all non-emergency related matters, contact the Police, on 131 444.

Note: Further guidance on reporting child abuse or harm is outlined at [Appendix K](#). Refer to the procedure that is relevant to the NCC's State or Territory of operation.

- Report the matter to the appropriate authority as required by the State or Territory within which they reside (see [Appendix K](#)) and request direction from them concerning the child's immediate welfare.
- Report all child safety complaints to the Safeguarding Representative or other relevant member of the NCC Management Committee or NCC Sub Committee who has no conflict of interest.
- Take immediate action to ensure the safety and wellbeing of the child.

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

A member of the NCC Management Committee must not be involved in any matter related to a complaint or disclosure where there may be a real or perceived conflict of interest.

The aim of advising the NCC Management Committee is to enable them to act effectively in implementing risk mitigation measures to ensure the safety and wellbeing of the child. This may involve appropriately restricting a person against whom an allegation has been made, by for example, removing a person from rostered duties or attendance at youth activities.

Actions taken by the NCC Management Committee and subsequent communication must not compromise legal confidentiality requirements. Police or other authorities may wish to speak to a child before other interviews occur. The child should not be questioned further about the disclosure until relevant external authorities such as the police have been provided with the opportunity to speak with the child and have confirmed that further inquiries can be made.

- A decision by the NCC Management Committee not to report a complaint or disclosure to the appropriate authorities does not prevent any other person from reporting it to the appropriate authorities. Individuals may still have a legal obligation to make a report in accordance with the legislation in the State/Territory within which they reside (see [Appendix K](#)).

Support and Protection for Reporters

- The NCC Management Committee informs parents / caregivers of progress and actions relating to any complaint process and discusses matters with parents / caregivers in accordance with the law.
- The NCC Management Committee must provide support to a child, or other person who makes a complaint or disclosure.

Note: Support may include – without compromising the confidentiality and conflict of interest requirements of this section – assistance with the reporting process and pastoral and/or professional counselling.

- The NCC will not penalise anyone who makes a complaint in the best interest of the child. Individuals are entitled to the protections outlined in the State or Territory legislation relevant to their Ecclesia (see [Appendix K](#)).

Reportable Conduct

- (a) If the NCC Management Committee is informed of a complaint or disclosure that may be reportable conduct under the applicable Reportable Conduct Scheme and which has not yet been reported to the appropriate authorities, they must determine if the circumstances constitute reportable conduct within the meaning of applicable legislation within the relevant State or Territory.
- (b) If the NCC Management Committee determines that an individual has engaged in reportable conduct, the complaint or disclosure must be reported to the appropriate authorities.
- (c) If the NCC Management Committee determine the conduct is not reportable conduct within the meaning of the applicable legislation, and that they are not required to report to relevant authorities, the decision and the reasons for that decision must be clearly documented in writing.

Step 4: Investigation

- (a) Members of the NCC must fully cooperate with an appropriate authority exercising a lawful power such as the Police and Child Protection Authorities.
- (b) If a report has been made to an external authority e.g. the Police and/or Child Protection Authorities, the NCC Management Committee should communicate with the relevant authority prior to initiating an internal investigation.
- (c) Where an investigation is required, the NCC Management Committee must engage an external investigator to ensure the independence and integrity of the investigation.

Notes: Reportable Conduct legislation in some States and Territories requires an investigation into reportable allegations. (refer to the Child Safety procedures in [Appendix K](#)). The NCC Management Committee must ensure that such an investigation occurs and is undertaken by an independent person (external to the Ecclesia) with appropriate expertise. The NCC Management Committee must not conduct the investigation themselves.

The appropriate authorities have professional personnel who are specialised in investigating child abuse and minimising the possible detrimental effect detailed questioning may have on alleged victims. For the same reason, qualified external investigators are recommended where internal investigations are required.

Step 5: Recording Complaints

All child safety complaints must be recorded using the *Child Safety Incident Report Form* (refer to [Appendix H](#)) regardless of whether the complaint meets the statutory reporting threshold. The completed form must be provided to:

- (a) The Safeguarding Representative.
- (b) The Management Committee.
- (c) The appropriate authorities (such as the Police, Child Protection Authorities if requested) and;
- (d) The relevant insurer.

Step 6: Risk Assessments

When the NCC Management Committee become aware of a complaint or disclosure, they must conduct a risk assessment to identify, assess and minimise any risks to the child, and secondary victims.

Note: This risk assessment should be conducted in a manner that does not interfere with any investigation by external authorities. It is an assessment of risk not an investigation of the veracity of a complaint or disclosure. After the level of risk and type of allegation is determined, the NCC Management Committee will consider what actions are necessary to safeguard children.

Some examples include, but are not limited to:

- *Removal of the individual from work with children.*
- *Additional supervision of the individual.*
- *Removal and/or ban of the alleged perpetrator from the Ecclesia's premises.*
- *Provision of ongoing monitoring of and support for the affected child.*
- *Delivery of training to NCC Members and non-Members.*

Step 7: Disciplinary Action

Where the subject of a complaint involves a person associated with the NCC, the following actions may be taken to maintain a child safe environment:

- (a) Increased supervision.
- (b) Removal or suspension from attendance at youth activities.
- (c) Removal or suspension from rostered duties.
- (d) Removal of NCC membership.

Step 8: Debrief

At the conclusion of the complaints process, the NCC Management Committee and/or Safeguarding Representative will debrief the affected parties on the final outcome and reasons for the decision. All information shared in debrief sessions must comply with the confidentiality requirements of this Policy.

- (a) The affected child and their parent/guardian:
 - Follow up with the child and/or their family and inform them of the outcomes and resolution.
 - If appropriate, connect the child and/or their family with support services.
 - Document all communications.
- (b) The subject of the complaint:
 - Debrief with the subject of the complaint and inform them of the outcomes and resolution.
 - Provide referrals to external agencies for additional and ongoing support such as counselling services (if required).
 - Document all communications.
- (c) Members and non-Members
 - Debrief with affected Members and non-Members and offer counselling services if required (and if appropriate).
 - Debrief all relevant Members and non-Members and provide relevant information (if appropriate)
 - Document all communications.
- (d) External Authorities:
 - The NCC Management Committee and/or Safeguarding Representative may also be required to communicate with the external bodies including the Police and Child Protection Services.

Additional Considerations

A. Confidentiality

A complaint or disclosure must remain strictly confidential to the extent permitted by law. The circumstances, the identities of the child, the person making the complaint and the subject of the complaint must remain confidential other than is necessary to ensure the safety and wellbeing of the child and for:

- (a) Communicating with the appropriate authorities;
- (b) Communicating with persons approved by the appropriate authorities (such as the child's parents or caregivers); and
- (c) Advising the NCC Management Committee

B. Disclosures

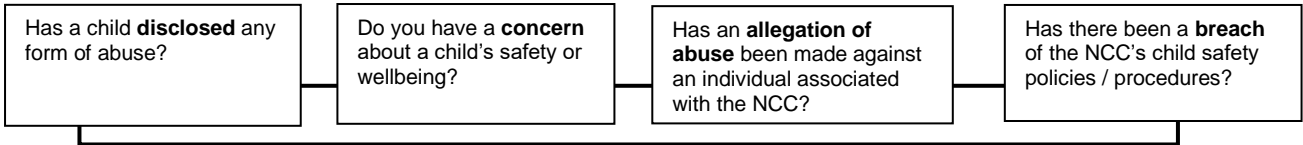
- (a) The NCC Management Committee must advise the Ecclesia's insurer of any complaint or disclosure reported to the appropriate authorities.
- (b) A person who attends an activity of the NCC and who is the subject of a complaint, whether related to activities of the NCC or not, must:
 - Immediately inform the NCC Management Committee or NCC Sub Committee;
 - Cooperate with the appropriate authorities in their investigation of the complaint;
 - Comply with the NCC Management Committee directions regarding that person's participation in the NCC's activities and interactions with children; and
 - Keep the NCC Management Committee informed of the status of the investigation into the complaint and its resolution.

C. Referral and Support Services

Insert here the contact details for referral and support services relevant to your State or Territory of operation.

Appendix G: Child Safe Complaint Handling Flow Chart

1. IDENTIFY AND RECEIVE



2. REPORT

YES

- (a) If a child is at immediate risk of abuse or harm, or the complaint involves a serious criminal offence, contact the Police, on **000** (request an Ambulance if required).
- (b) For all non-emergency related matters, contact the Police, on **131 444**.

THEN

- Immediately:**
1. Complete the Child Safe Incident Report Form
 2. Report to the appropriate external authorities in accordance with your child safe legal obligations:
 - **Has a child abuse offence been committed against the child?** If **YES**, report to the Police **DIAL 000**.
(refer to your State or Territory's Failure to Report legislation at [Appendix K](#))
 - **Does it meet Mandatory Reporting requirements?**
 1. If **YES**, REPORT to Child Protection Authorities.
 2. If **NO**, call the Child Protection Authorities to seek further guidance and clarification.
(refer to your State or Territory's Mandatory Reporting legislation at [Appendix K](#))
 - **Does the allegation constitute reportable conduct?**
If **YES**, notify the NCC Management Committee who will comply with legislative requirements in the NCC's relevant State or Territory.
 3. Report to the Safeguarding Representative/s or designated member of the NCC Management Committee.

3. INVESTIGATE AND RECORD

THEN

1. The NCC Management Committee to appoint external investigator for internal investigations (in accordance with Police direction) and take appropriate action.
 2. Record and store:
 - The Child Safe Incident Report Form.
 - All information relating to the investigation findings, reasons and outcomes.
 - Advice received from Child Protection Authorities and case reference number (if reported).
 - All other relevant information including about referral and support services.
- In relation to Reportable Conduct:** Document all information relevant to the allegation, investigation progress, findings and action taken. Comply with legislative requirements in relevant State or Territory.

4. DEBRIEF

THEN

- The NCC Management Committee and/or the Safeguarding Representative/s:**
- Debrief affected child (and/or their family).
 - Provide information about support and referral services to affected parties (if appropriate).
 - Continue to monitor the situation.
 - Continue to communicate with the Police and Child Protection Authorities (as required).

Appendix H: Child Safety Incident Report Form

This form should be completed for all child safety complaints. Before completing this form, please ensure that all requirements outlined in the *Safeguarding Children Policy* have been followed and advice has been sought from external authorities where appropriate.

This record and any notes must be kept in a confidential place and stored in accordance with record keeping guidelines outlined in the *Safeguarding Children Policy*. The NCC should provide any records to the relevant external authorities should they require them.

Child Safety Incident Report Form	
Complainant's Details	Name: Phone: Email Address:
Classification of Complainant <i>e.g. Member, non-Member, Activity Coordinator, Youth Worker, Member of the Public etc.</i>	
Date Complaint received:	
Child's Details	Name: Age: Address:
Does the child identify as a child from Aboriginal and Torres Strait Islander or First Nations background?	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Unknown
Does the child have a disability?	<input type="checkbox"/> No <input type="checkbox"/> Yes, please provide relevant details:.....
Does the child come from a Culturally and Linguistically Diverse backgrounds?	<input type="checkbox"/> No <input type="checkbox"/> Yes, please specify.....
Does the child require communication support?	<input type="checkbox"/> No <input type="checkbox"/> Yes

<p><i>Communication support may include an interpreter, a support person, family member etc.</i></p>	<p>If yes, please provide any information relating to the child's preferred communication methods, support needs and involvement in the complaints process:</p>
<p>Category of the Incident</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Emotional or psychological abuse <input type="checkbox"/> Neglect <input type="checkbox"/> Sexual Abuse <input type="checkbox"/> Grooming <input type="checkbox"/> Physical abuse <input type="checkbox"/> Exposure to Family violence <input type="checkbox"/> Breach of the Safeguarding Children Policy/Code of Conduct <input type="checkbox"/> Other inappropriate behaviour <p>Please detail: _____ _____ _____</p>
<p>Name of person complained about (Respondent)</p>	
<p>Classification of Respondent</p> <p><i>e.g. Member, non-Member, Activity Coordinator, Youth Worker, Member of the Public etc.</i></p>	
<p>Date of incident</p>	
<p>Time of incident</p>	
<p>Location of incident</p>	
<p>Witnesses</p> <p>(if more than 3 witnesses, attach additional details to this form)</p>	<p>Name (1):</p> <p>Contact details:</p> <p>Name (2):</p> <p>Contact details:</p> <p>Name (3):</p> <p>Contact details:</p>
<p>Details of complaint / reason for suspecting abuse</p> <p><i>Use as much detail here as necessary including:</i></p>	

<ul style="list-style-type: none"> • <i>what was said, (where possible, noting the exact words used by the person making the allegation);</i> • <i>what you observed (e.g. injury, harm, disclosure) and any other details relevant to the incident.</i> 	
<p>Interim immediate action (if any) taken to ensure child's safety and/or to support needs of person complained about</p> <ul style="list-style-type: none"> • <i>Interim action may include transfer of alleged perpetrator to non-child-related duties, suspension, removal</i> 	
<p>Provide details of any harm or injuries to the child, and if the child or others received medical attention.</p>	
<p>Police contacted <i>Complete if relevant</i></p>	<p>Who: <i>name of Police Officer reported to</i></p> <p>When: <i>date and time you contacted the police</i></p> <p>Advice provided:</p> <p>Case reference number (if known):</p>
<p>Child Protection Authorities <i>Complete if relevant</i></p>	<p>Who: <i>name of contact person</i></p> <p>When: <i>date and time you made contact</i></p> <p>Advice provided:</p> <p>Case reference number (if known):</p>

<p>Relevant State Department contacted <i>Complete if relevant</i></p>	<p>Who: <i>name of contact person</i></p> <p>When: <i>date and time you made contact</i></p> <p>Advice provided:</p> <p>Case reference number (if known):</p>
<p>Safeguarding Representative or member of the NCC Management Committee or NCC Sub Committee</p>	<p>Who: <i>name of person reported to</i></p> <p>When: <i>when did you contact them</i></p>
<p>Completed by</p>	<p>Name:</p> <p>Position:</p> <p>Signature: Date:</p>
<p>Signed by</p>	<p>Complainant name (if it is not a child):</p>

Appendix I: Child Safe Situational Prevention Strategies

Table 13: Child Safe Situational Prevention Strategies

Child Safe Situational Prevention Strategies		
Increase the Effort	Decrease the Risks	Remove Excuses
<p>Deflect Offenders</p> <ul style="list-style-type: none"> Publish on the website: <ul style="list-style-type: none"> The NCC's commitment to child safety Child safe policies Ensure job advertisements: <ul style="list-style-type: none"> Promote the NCC's commitment to child safety Include a requirement for WWCC 	<p>Extend Guardianship</p> <ul style="list-style-type: none"> Encourage and support the inclusion of parents, families, and children in NCC activities and in decision making Encourage and support children to have a voice and speak up if they do not feel safe Create a child-centred culture. 	<p>Set Rules</p> <ul style="list-style-type: none"> Implement child safe policies, procedures, and codes of conduct Role descriptions and expectations outlining the duties of NCC Members and non-Members Implement child safe policies and guidelines Provide regular feedback opportunities
<p>Screen Applicants</p> <ul style="list-style-type: none"> Verify Working with Children Checks Thorough reference checks to confirm prior employment history and any instances of inappropriate behaviour with children Robust interview process to understand the applicant's child safety values. 	<p>Assist Natural Surveillance</p> <ul style="list-style-type: none"> Design open plan spaces where children interact with adults to allow for natural surveillance and line-of-sight supervision Ask children to identify areas where they do not feel safe Ensure windows are not obscured with posters or frosted glass Ensure children are not in isolated areas unless accompanied by more than 1 adult. 	<p>Display Instructions</p> <ul style="list-style-type: none"> Make child safe policies, procedures, and codes of conduct accessible Develop age-appropriate posters to inform children how to stay safe Develop and display posters: <ul style="list-style-type: none"> Indicating the Ecclesia's commitment to child safety Informing NCC Members and non-Members how to make a complaint.
<p>Modify Physical Environment</p> <ul style="list-style-type: none"> Prevent access to concealed and secluded areas Implement rules to make the concealed areas 'out of bounds' Use clear glass in doors and windows to assist natural surveillance Install surveillance equipment in high-risk environments. 	<p>Reduce Anonymity</p> <ul style="list-style-type: none"> Ensure all NCC Members and non-Members who work with children are easily identifiable to parents and caregivers Provide feedback mechanisms on all areas of the NCC including Members and non-Members, the environment, and the culture. 	<p>Child Safeguarding Code of Conduct</p> <ul style="list-style-type: none"> see Appendix D
<p>Governance & Leadership</p> <ul style="list-style-type: none"> Disciplinary policies outline consequences of breaching the <i>Child Safeguarding Code of Conduct</i> Provide ongoing support and guidance about Child Safe Best Practices Provide support for people who make complaints or allegations 		

Appendix J: Safeguarding Risk Assessment Template

Date reviewed	[insert date]
Next review due	[insert review date, no longer than one year from date reviewed]
Activity	[What activity are you applying this to? Where and when is it taking place? Who is involved?] <i>Example: NCC Activity, Sunday 9am – 11am, children aged 6 – 10 years</i>
Completed by:	
Completion date:	

Refer to the Risk Assessment Tools overleaf to determine the Likelihood, Consequence and Risk Rating for each identified risk.

Potential Risks	Likelihood	Consequence	Risk Rating	Existing Risk Controls	New controls required
	Almost Certain Certain Possible Unlikely Rare	Insignificant Minor Moderate Major Catastrophic	Low Medium High		
<i>Identify the risk</i>	<i>Refer to the Likelihood table</i>	<i>Refer to the Consequences table</i>	<i>Refer to the Risk Matrix Tool</i>	<i>What does the NCC currently have in place to minimise the identified risk?</i>	<i>Are there any gaps in the NCC's existing controls?</i>

Risk Assessment Tools

Table 14: Consequence of Risk Table

Consequence Table		
Category	Consequence	Description
1	Insignificant	<ul style="list-style-type: none"> Minor injury, altercation, or mishap No first aid or support for stress/ trauma required.
2	Minor	<ul style="list-style-type: none"> Environmental surroundings may contribute to child being at risk Minor behavioural issues Minor first aid and support for stress/trauma event required.
3	Moderate	<ul style="list-style-type: none"> Serious injuries and/or illness requiring medical attention Complex welfare and/or health issue Serious stress/trauma event requiring professional support.
4	Major	<ul style="list-style-type: none"> Injuries requiring hospitalisation Child missing from main group A child is at risk of abuse Stress/trauma requiring ongoing clinical support.
5	Catastrophic	<ul style="list-style-type: none"> Critical incident Death or disability of child Stress/trauma event requiring extensive clinical support for multiple individuals High level of distress to other parties.

Table 15: Likelihood of Risk Table

Likelihood Table		
Category	Level	Probability
A	Almost Certain	Almost certain to occur in most circumstances
B	Likely	Likely to occur frequently
C	Possible	Possible and likely to occur at some time
D	Unlikely	Unlikely to occur but could happen
E	Rare	May occur but only in rare and exceptional circumstances

Risk Matrix Tool

Once the appropriate category of consequences and the likelihood of risk is determined, you can use a risk matrix tool to determine a risk score.

Results		LIKELIHOOD					Risk
		Rare	Unlikely	Possible	Likely	Almost Certain	
CONSEQUENCE	Catastrophic	Medium	High	Extreme	Extreme	Extreme	
	Major	Medium	Medium	High	Extreme	Extreme	
	Moderate	Low	Medium	High	High	Extreme	
	Minor	Low	Low	Medium	High	High	
	Insignificant	Low	Low	Low	Medium	High	

Tolerance Levels

The risk score determined using the Risk Matrix Tool can provide an indication of the priority level of the risk, indicating the urgency to take remedial action.

Table 16: Risk Tolerance Table

Risk Rating	Risk Treatment
Extreme	<ul style="list-style-type: none"> • Activities must be suspended immediately until risks can be eliminated, controlled, or reduced to a lower level. • Report risk to the NCC Management Committee or NCC Sub Committee and seek further advice.
High	<ul style="list-style-type: none"> • Risks are considered significant. • Ensure all controls identified are in place and review processes regularly. • Activities must not proceed without authorization from the Management Committee.
Medium	<ul style="list-style-type: none"> • Risks are considered acceptable. • Ensure all controls identified are in place and schedule regular review.
Low	<ul style="list-style-type: none"> • No significant risks exist. • Ensure controls are in place and monitor progress.

Appendix K: Child Safety Procedures for NSW ecclesias

(a) This appendix contains Child Safety Procedures relevant to NSW. These procedures provide supporting information about:

- Screening requirements for adults who will work with children;
- Who is defined as a child;
- Who must report child abuse;
- Who can report child abuse;
- Child protection and related legislation;
- Appropriate authorities; and

Note: The NCC should liaise with relevant authorities in implementation of this Policy.

- Where to access information and support services for children and their families.¹¹

(b) These Child Safety Procedures do not remove any obligations of the NCC to operate in accordance with its *Safeguarding Children Policy*.

¹¹ Information on resources is as published by the Australian Institute of Family Studies - <https://aifs.gov.au/resources/practice-guides>

Child Safety Procedures – NSW

1. Regulation of the Child Safe Standards

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

2. Recruitment obligations

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

This aligns with the NCC’s *Safeguarding Children Policy* which requires the implementation of a register to record the WWCC clearance and verification information of personnel associated with the NCC.
- 2.4. ‘Child related work’ is work that involves direct contact by an individual with a child or children and that contact is a usual part of and more than incidental to the work. Direct contact includes physical contact or face to face contact.

- 2.5. The NCC must register with the Office of the Children's Guardian (OCG) to verify the WWCC details of persons engaged in child-related work. Refer to [Help to register and verify | Office of the Children's Guardian \(nsw.gov.au\)](#) for guidance on how to register the NCC.
- 2.6. Verification must be completed through the OCG's online WWCC system.

3. Mandatory reporting

- 3.1. Table 19 defines mandatory reporting requirements in New South Wales.

Table 19: Mandatory Reporting Requirements in New South Wales

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

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

4. Voluntary reporting

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

5. Concealing child abuse offence – *Crimes Act 1900 (NSW) s 316A*

5.1. Under the *Crimes Act 1900 (NSW)*, any adult who:

- (a) Knows, believes or reasonable ought to know that a child abuse offence has been committed;
 - (b) Knows, believes or reasonably ought to know that he or she has information that might be of material assistance in securing the apprehension of the offender or the prosecution or conviction of the offender for that offence; and
 - (c) Who fails without reasonable excuse to bring that information to the attention of a member of the NSW Police Force as soon as it is practicable to do so,
- is guilty of an offence punishable by up to 5 years of imprisonment.

6. Failure to Reduce or Remove risk of child becoming victim of child abuse – *Crimes Act 1900 (NSW) s 43B*

6.1. An adult who carries out work for a child-related organisation (employee, contractor, volunteer or other) commits an offence if —

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

Maximum penalty—Imprisonment for 2 years.

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

7.1. The duty to prevent applies to organisations that exercise care, supervision, or authority over a child (under 18 years). Relevantly, the duty applies to all Ecclesia in NSW.

7.2. An organisation that exercises care, supervision, or authority over a child must:

- (a) Take reasonable precautions.
- (b) To prevent an individual associated with the organisation.
- (c) From committing child abuse (sexual or physical abuse).
- (d) Against a child (who is under the care of the organisation).

7.3. An individual is associated with an organisation if the individual is an office holder, officer, employee, owner, volunteer, or contractor of the organisation. If the organisation is a religious organisation, it also includes a religious leader (such as a priest or a minister) or member of the personnel of the organisation.

8. Reportable Conduct

8.1. Under the NSW Reportable Conduct Scheme (**the Scheme**), heads of entities must report to the Office of the Children's Guardian (**OCG**) if they become aware of a reportable allegation or conviction in relation to an employee of a relevant entity.

8.2. Religious bodies are captured by the Scheme if they are:

- (a) a body established for a religious purpose, and
- (b) an entity that establishes, or directs, controls, or administers, an educational or other charitable entity that is intended to be, and is conducted in accordance with religious doctrines, beliefs, or principles.

- 8.3. An **‘employee’** in a religious body is an individual who holds, or is required by the religious body to hold, a working with children check clearance for the purpose of engagement with the religious body.
- 8.4. **Reportable allegation**, in relation to an employee of a religious body, means an allegation that the employee has engaged in conduct that may be reportable conduct, whether or not the conduct is alleged to have occurred in the course of the employee’s engagement with the religious body.
- 8.5. This is an ‘allegations based’ Scheme which means the allegation triggers the obligation to notify the OCG. There does not need to be any evidence or proof that the conduct occurred if the allegation falls within one of the following categories of reportable conduct:
- (a) a sexual offence;
 - (b) sexual misconduct;
 - (c) assault against a child;
 - (d) ill-treatment of a child;
 - (e) neglect of a child;
 - (f) any behaviour that causes significant emotional or psychological harm to a child; or
- 8.5.1.(g) criminal offences such as the failure to reduce or remove risk of a child becoming the victim of abuse and concealing child abuse (*Crimes Act 1900 ss 43B and 316A*).
- 8.5.2.If a person becomes aware of a reportable allegation or a reportable conviction in relation to an employee of a relevant entity, the person must, as soon as practicable, report to the Management Committee.
- 8.6. The Management Committee of a religious body must notify the OCG if:
- (a) they receive a report in relation to an employee of the relevant entity.
 - (b) they otherwise become aware of a reportable allegation or reportable conviction in relation to an employee.
- 8.7. The Management Committee has 7 business days from being informed of a reportable allegation to notify the OCG. The notice must include certain information relating to the reportable allegation, requirements are outlined in the *Children’s Guardian Act 2019* at s 29.
- 8.8. The Scheme also places obligations on the Management Committee to undertake an assessment and investigation into the reportable conduct as soon as practicable after receiving a report. The *Children’s Guardian Act 2019* outlines the requirements at Division 5.
- 8.9. For Reportable Conduct advice and support call (02) 8219 3800 or email reportableconduct@ocg.nsw.gov.au

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

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

10. Information and support services

10.1. Table 20 contains information on support services available to children and families in New South Wales.

Table 20: Information and support services available in New South Wales

For children:	<p>Kids Helpline: call 1800 55 1800 for free counselling and advice for young people between the ages of 5 and 25.</p>
For adults:	<ul style="list-style-type: none"> • Lifeline: call 13 11 14 for this free Australia-wide crisis support and suicide prevention service. • Parent Line: call 1300 1300 52 for a free telephone counselling and support service for parents and carers with children aged 0 to 18. • Christadelphian Support Networks • Programs, services and support Family & Community Services (nsw.gov.au) - contact list of information and support services for parents, families and young people in NSW.
Resources:	<p>The resources listed on this page have a practice focus, and are designed to assist practitioners, managers, and service providers in their work.</p>

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