



Seventh-day
Adventist Church



South Pacific

Seventh-day Adventist Church Child and Vulnerable Person Protection Policy

An outline of the legal obligations and imperatives for local Seventh-day Adventist churches and church companies for the protection of Children and Vulnerable Persons.

For employees, volunteers, members and attendees at SDA sites controlled by and events conducted by Local churches, Conferences, Unions and the Division.

In the Australian Union Conference, the New Zealand Conferences in the New Zealand and Pacific Union Conference and South Pacific Division head office.

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1 Executive Summary

1.1 History

This policy is an update of the Safe Place Service “Creating a Safe Place Policy” and incorporates some elements from the “Local Conference, Safe Place Policy”.

These policies were mature, robust policies and at the time Adsafe was established addressed current best practice approaches to Child Protection. While these documents clearly articulated a detailed list of policy imperatives, they lacked detail around assigning persons to be responsible for preventative and responsive actions needed in policy implementation.

As a result of the Australian Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission) child protection is a quickly changing landscape with various governments making significant adjustments to their child protection framework with amongst other things changes to legal requirements and the implementation of various child safe standards approaches to child protection. This introduces a shift in strategy from compliance to a smaller number of minimum standard legal requirements to an attempt at a larger number of better practice initiatives designed to meet a list of published standards. The various applicable standards can be found in the appendices of this document.

[<Discussion on a Standards approach>](#)

[<Appendix A: National Principles for Child Safe Organisations>](#)

[<Appendix B: 7 Victorian Child Safe Standards>](#)

[<Appendix C: South Australian Principles of Good Practice>](#)

[<Appendix D: Queensland’s Child and Youth Risk management strategy>](#)

1.2 A New Policy Framework

Adsafe will refer to its new policy framework as the Adsafe Child and Vulnerable Person Safeguarding Framework or the **Adsafe Safeguarding Framework** for short.

Given the history discussed above, Adsafe will develop its Safeguarding resources using layered documents. These being:

Table 1: Adsafe Safeguarding Framework

Document	Description
Policy	An outlines of all imperatives This document <i>Audience: Governance bodies, Persons assigned roles</i>
Guidelines: Roles, Responsibilities and Processes	An outline of specific roles created, the responsibilities for persons with these roles and the processes that will follow to deliver these imperatives <i>Audience: Persons assigned roles</i>



Document	Description
Guidelines: Frequently Asked Questions	A document for the wider community who may wish to know how the organisation responds to child and vulnerable person protection matters <i>Audience: Community members</i>
Resources: Checklists, Templates and Tools	Support materials that will assist the organisation in the implementation of the above documents
Practice updates	Time sensitive information outlining recent changes to practice

Further information on the Adsafe framework including a schedule for policy releases can be found at [<Adsafe Safeguarding Framework>](#)

1.3 Audience

This document applies to organisations associated with the Seventh-day Adventist church including

1. Local churches including church companies, groups and church plants.
2. Incorporated entities set-up to administer the regional work of the Seventh-day Adventist church in various levels including the local conference, union conference in the South Pacific Division.

This document is specifically designed to inform two groups.

3. Members of governance bodies of the organisations listed in (1) and (2) above in whatever form they take. These might include members of Church Boards or equivalent and Board directors of incorporated entities at each administrative level.
4. Persons appointed by these organisations with responsibilities outline in this policy and the wider Adsafe Child and Vulnerable Person Protection framework.

Other interested parties are free to peruse the document at leisure.

1.4 Governance Implications

It was identified that governance bodies for any organisation offering services to children has an important role in creating and supporting Child Safe organisations. This is articulated in the National Principles for Child Safe Organisations endorsed by Australian and State governments. The most applicable principle that applies to governance and leadership is:

- 1 *Child safety and wellbeing is embedded in organisational leadership, governance and culture.*

As a member of a governance body with power to make decisions you are given the responsibility to ensure that the organisation you lead is a safe environment for children and vulnerable person.

Adsafe has been assigned the responsibility by the wider church to develop, implement and improve appropriate responses to the risk of Child and Vulnerable Person abuse in the church communities. Adsafe then is your partner in assisting each organisation to minimise and hopefully eliminate abuse in the church. To this end Adsafe will develop material that will assist churches and church entities.

While it is not necessary for you to know all the detail of a child protection strategy, governance is about ensuring that policy is implemented appropriately and that persons



are assigned to take responsibility for various key tasks in the church's prevention strategies.

Adsafe will work on regular review of this policy and any associated guidelines. While new guidelines are being developed and implemented you as a person with governance responsibilities are free to contact Adsafesafe to seek advice around any concern you may have.

1.5 Implementation Schedule

Policy implementation can be daunting. Adsafesafe has taken the approach to break the process down to smaller more manageable tasks. Instead of expecting the whole Adventist membership to be familiar with all elements of the framework, Adsafesafe would like to delegate various tasks to key individuals who will manage these tasks on behalf of the governance body.

This document provides the Policy imperatives that will be address in greater detail in specific guidelines that will be released at a later date.

Guideline documents will include a Responsibilities section which is essentially a job description for key persons. The Implementation section is a statement of the process from beginning to end while the responsibility section is a listing of all the tasks assigned to a person from the Implementation section grouped under specific roles.

Tasks in the implementation schedule

1. The Church Board or equivalent or the Church Company Board (the board) should complete the following tasks no later than **1 October 2020**:
 - a) approve the Child and Vulnerable Person Protection Policy
 - b) appoint an Adsafesafe Responsible Officer. (Job description for this role can be found in the Role Requirements Guidelines – being release in conjunction with this policy)

The diagram below provides a quick summary for members of governance bodies and for persons appointed to roles on how to approach implementation of this and other Adsafesafe documents. It should always be remembered that Adsafesafe was set-up as a resource for the church to guide its members on how to create safer environments where people can discover the love of God. No one person needs to bear the responsibility of this alone. While there is quite some complexity in Child Protection legislation and other requirements across Australia and New Zealand it is not an expectation that anyone individual needs to know this information. Adsafesafe has the responsibility to manage this on behalf of the church. This means that if you have a concern about any child or vulnerable person matter you are welcome to call Adsafesafe. One of our core responsibilities is to provide advice. If you are struggling with any anxiety over child or vulnerable person protection matters, we would encourage you to contact us using anyone of the means outlined below.

Phone: Australia	1800 220 468
New Zealand	0800 442 458
Internet	Adsafesafe.org.au
email	info@adsafesafe.org.au

We would be happy to assist in discussing and suggesting a solution or a plan to arrive at a solution in the future. Further information on policy compliance can be found at [<discussion on compliance>](#)

Figure 1: Implementation Framework

Entity or Person

Board or equivalent

1. Follows Implementation Schedule
- (a) acknowledges *policy or guideline* now being in place.
- (b) looks at *Job Description* and then appoints.

Appointed Person

1. Reads *Responsibilities* and *Implementation*.
2. Seeks advice from Adsafe as needed.
3. Completes any applicable training.
4. Reads *FAQ* documents, uses *checklists* and *tools* provided to complete tasks.

Policy or Guideline

**Executive Summary
Implementation Schedule**

1. Adopt ~~~~~
2. Appoint ~~~~~
3. Appoint ~~~~~

Responsibilities

1. ~~~~~
2. ~~~~~
3. ~~~~~

Implementation

1. ~~~~~
2. ~~~~~
3. ~~~~~

One on One Advice and Support (Adsafe)



Training (Adsafe)



Supporting Material

Frequently Asked Questions (FAQ)

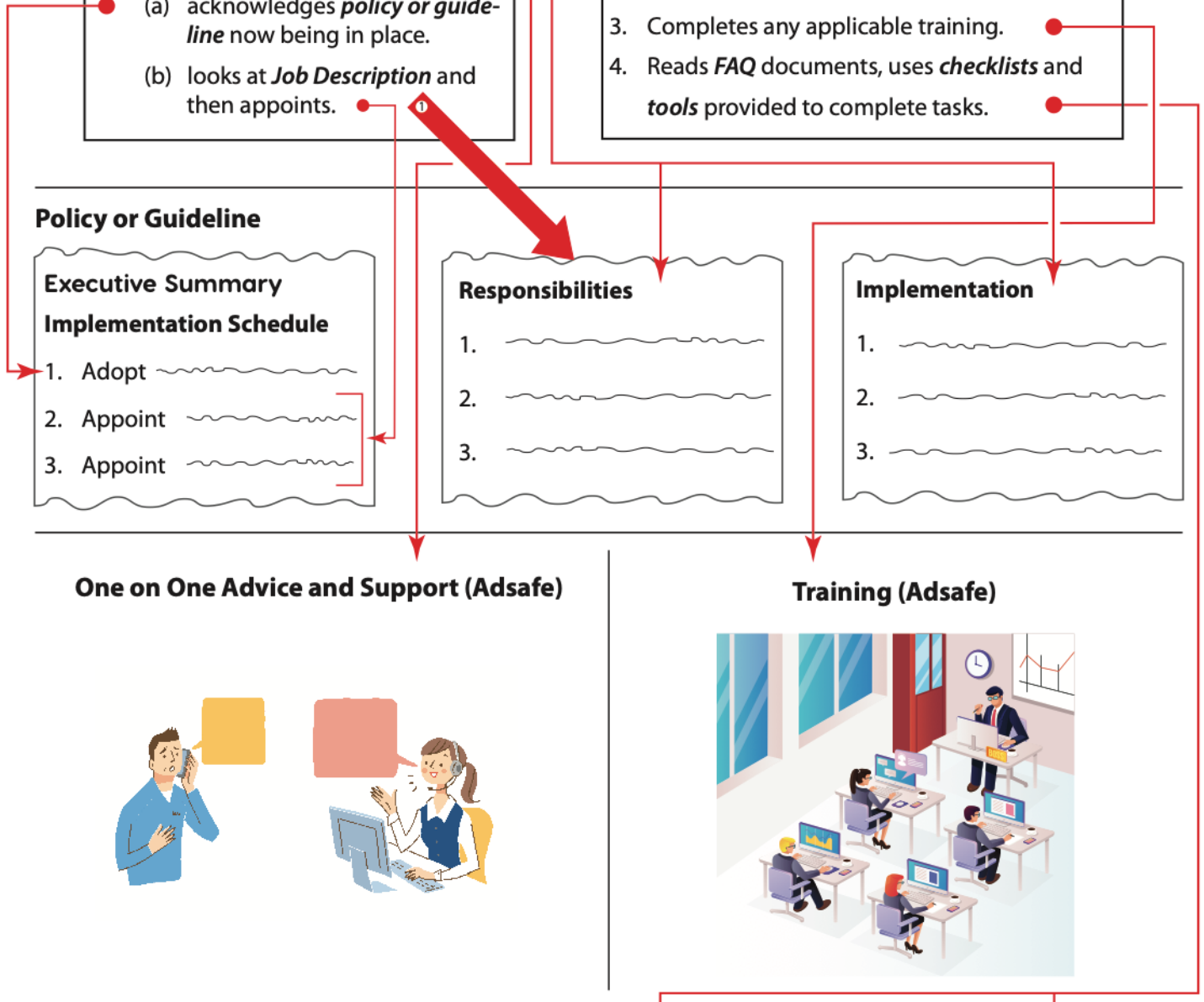
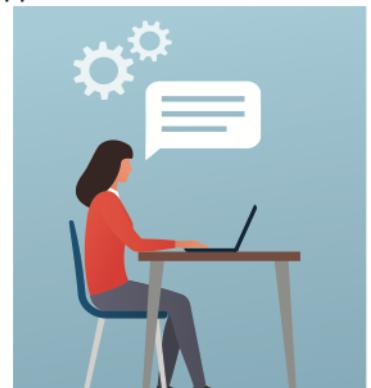
1. ~~~~~
2. ~~~~~
3. ~~~~~

Checklist

1. ~~~~~
2. ~~~~~
3. ~~~~~

Tools

Applications to maintain records





1.6 Other helpful information in this document

For further information on...	Go to...
Why the policy?	<u><Policy Rationale></u>
What does the policy try to do?	<u><Policy Aims></u>
What is the context for this policy?	<u><Policy Context></u>
How do you define...?	<u><Definitions></u>
What legal principles guide the policy?	<u><Legal Principles></u>
What is the applicable key legislation?	<u><Key Legislation></u>
How does the Church Manual and Church Policy guide cvp protection?	<u><Church Manual and Policy></u>
What is Adsafes's role in policy development?	<u><Adsafes's role></u>
Better practice: the role of standards?	<u><Child Safe Standards></u>
What must be done?	<u><Implementation Plan></u>

This is the end of the executive summary. The detailed document starts from here



2 Rationale

The Seventh-day Adventist Church is committed to creating and sustaining the Church as a safe place for everyone. This includes maintaining safe environments within the Church, its Affiliated Entities and all its programs as safe places for children, vulnerable people, attendees, volunteers and employees.

“The Adventist Christian community is not immune from child sexual abuse. We believe that the tenets of the Seventh-day Adventist faith require us to be actively involved in its prevention. We are also committed to spiritually assisting abused and abusive individuals and their families in their healing and recovery process, and to holding church professionals and church lay leaders accountable for maintaining their personal behaviour as is appropriate for persons in positions of spiritual leadership and trust.” (Church Manual, South Pacific Division Supplement, Page 243)

“There is no priority higher than protecting children, and other vulnerable people, within our care. This is something close to the heart of God (see Matthew 18:6), and cannot be done through wishful thinking or vague aspirations. In order to intentionally protect children and the vulnerable from abuse, and be admitted to membership, or maintain membership of the sisterhood of churches, local church congregations must comply with Adsafe child safe policies. These policies are up-dated periodically as best practices in this area continue to evolve. It is essential to ensure the version of the policies followed are current. (SPD Executive Committee Nov 15, 2016)

The church has an obligation to the wider community to comply with child protection legislation to ensure that children in its care are able to attain the full potential that God originally intended for them and to become active, vibrant and fully functioning members of our community.

The church, like all organisations in the wider community has a common-law duty of care to protect all participants in its services and activities and to anyone who attends its sites from foreseeable harm. This includes harm from other persons who may also attend. Failing to take steps to protect persons from foreseeable harm in the church context is seen as negligence and exposes the church to reputational and financial risk. The church also has obligations to ensure a safe environment under work health and safety legislation.

3 Aims

This policy aims to create a church environment that is safe for children and vulnerable persons (cvp). This is done through the following mechanisms.

1. The adoption and implementation of child and vulnerable person protection policy, guidelines and practices (the Safeguarding Framework) as developed by Adsafe on the church's behalf
2. Through continual education and training ensure that volunteers, including persons in a governance roles, are suitably trained and equipped with knowledge, skills and awareness to keep children and vulnerable persons safe.
3. Ensure that the Safeguarding Framework is continuously reviewed and improved.
4. Regularly assess the risk of abuse in environments used for church activities and implement plans to suitably manage these risks.
5. Ensure that stakeholders and particularly cvp are aware of how to report cvp protection complaints or concerns and that the church's reporting obligations are routinely met.



6. Ensure that persons working with cvp are suitable by using a variety of screening techniques before appointment and are supported by providing appropriate post appointment supervision.
7. Ensure that cvp protection is a core priority in the church and is actively supported by church leadership, in church governance decisions and by intention strategically working to improve the cvp culture.
8. Ensure that the opinions of cvp are valued and that they are able to participate in the decision-making process.
9. Ensure that families and communities are appropriately informed and involved in cvp matters.
10. The diverse nature of our church communities is acknowledged. When responding to cvp protection related matters due weight is given to these diverse needs and this is done through a framework of equity.

4 Context

The Child and Vulnerable Person Protection Framework, when completed, will eventually supersede Safe Place Services Child Protection Policy Framework.

This policy and its related guidelines, both those presently ready for release and those planned for development in the future, will supersede the Local Church Policy: Safer Environments for Children and Young People (2014.11) and the Local Conference: Safe Place Policy (2013.06). These are intended to guide local churches and church companies in matters related to child and vulnerable person protection. It is intended that there will be a separate policy and related guidelines for church affiliated entities such as Schools, ADRA, Tertiary Institutions, Health institutions and Aged Care institutions.

Adsafe acknowledges the importance of the care and protection of the Vulnerable persons who are part of our community as stated in its objects and powers. As such it plans to develop policy and guidelines to inform the church in its engagement with this important group. Adsafes strategy is to commence this important work with guidance on how to handle complaints and investigations into alleged harmful conduct by persons in our community towards these persons in our community. This will be first evident in the release of the **Reporting and Notifications Guidelines** scheduled for release in late 2020.

5 Compliance

Adsafe acknowledges that in this present very complex world there are a large number of competing interests that are exacerbated by our fast-paced post-modern world. This is also very true within God's church. God's church has always relied on His disciples being called to serve Him in voluntary service to members of the community both church and the wider community. With the complexity and the demands of life it is understood that it is increasingly difficult in our church to get persons who have available time to volunteer their precious time to serve.

This reality collides with the importance of the protection of our vulnerable community members including our children. High profile government reviews into how institutional leaders have responded indicates how important it is to ensure that abuse doesn't occur in the first place but if it does, that the response is appropriate and not hampered by a lack of compassion or resources.

It should be understood that the Seventh-day Adventist Church should be commended for identifying the importance of the protection of children as evident in the creation of a



special service in 2000 known by various names including Safe Place Services. Adsafe acknowledges the huge debt it owes to this service including a mature set of policies that it inherited from this service. The principles articulated in these policies would be understood as best practice in child protection in 2016. The failure in child protection in the Seventh-day Adventist church was not in a lack of understanding of the important principles needed, but rather the provision of resources needed in educating people to understand and know how to respond when concerns arise.

Given these understandings Adsafe is in a difficult position as it faces the task of policy (the principles) and guideline (what to do) implementation. This is the same hurdle that Safe Place Services faced. In Adsafe's assessment of the inherited framework it is evident that while the principles are clearly articulated what is missing is the detailed account of what needs to be done by a church when faced by a certain trigger and who is responsible to do that task. This is what Adsafe intends to be the purpose of the guideline document. The result of all this is that the cvp framework is not going to be less but more documentation. Adsafe understands that this will be discouraging to the small percentage of volunteers who are already bearing the brunt of the burden of delivering the services of the church.

As leaders and decision makers in our church you are about to commence a journey with Adsafe of looking at how we can better protect our vulnerable community members. This will, for some of you, create some anxiety as you will wish to know the full detail of what is being asked before making your commitment of support. Adsafe acknowledges that we haven't yet put our minds to the detail around how to manage some challenges. This is compounded by the fact that our governments have decided that rather than getting us to respond more appropriately by legal means it prefers to develop standards and get us to prove that we are meeting these standards. This is a change in the philosophical approach. Rather than having a small number of minimum standards we are asked to adopt a whole lot of stretch targets while maintaining these minimum standards.

In this context Adsafe proposes a different approach to policy and guideline implementation.

- The first principle is that we don't expect everyone who is part of the community, the attendees, the members, the volunteers and those employed to know every piece of legislation, every principle written in Adsafe policy and the full detail of every guideline. We need to work smarter and share the burden of this important task. Instead of everyone being expected to know everything we propose that a small number of delegated persons manage the detail of required tasks.
- Adsafe will attempt in its implementation of a new document to break the process into small simple steps giving suggested deadlines and providing training and support at each step.
- Adsafe understands our present state. We are aware that some churches are barely keeping their head above water. While SPS policy has been available for some time now and should have been implemented, we recognise that it may not have been for all sorts of reasons. We are not interested in blame but rather how we can get you to be where you need to be.
- Adsafe acknowledges the importance of church leadership. Our structure has always been centred on the wisdom of a group rather than single figures. This means that the church board has an important role. This principle has also been identified externally by policy writers and important public reviews of child protection failures. This they refer to as governance. Proper child protection initiatives need the support of the leaders of a community who are performing the governance role. If you are a board member you may feel that this is a



daunting responsibility. Please understand that governance doesn't require you to know everything but rather that you have comfort that the board has got a plan or a person to manage the responsibility. Adsafes will ask you to approve policies or guidelines from time to time. These will suggest how you as a church or church company should handle a matter. This will usually be the appointment of someone responsible. Adsafes will provide that person with the detail of how to do the job. Adsafes doesn't expect each member of the board to know everything in the document but rather that you respond when things appear not to be getting done. Adsafes will develop targeted training for those who are in a governance role. Finally, remember that if you have a concern about how child protection is going in your church you are free to contact Adsafes for advice.

In approving this policy Adsafes asks you to only approve the principles articulated in the document. These principles are mostly only a restatement of principles developed by Safe Place Services and already agreed to by the wider church. Adsafes will from time to time release guidelines that will describe in detail how these principles will be achieved. At that time you will be asked to approve these newly released guidelines.

6 Definitions

Table 2: Definitions

Term	Definition
Adsafes	<p>Organisation set up by the SPD that is concerned with physical and sexual abuse of children and vulnerable persons on its property or by its employees, persons in leadership or volunteers holding positions. This is done by:</p> <ol style="list-style-type: none"> 1. safeguarding the organisation by the development and implementation of policy and providing training for persons with responsibility who interact with children and vulnerable persons. 2. supporting survivors and their families 3. coordinating independent investigations into allegations 4. managing known offenders and persons of concern 5. providing advice about safeguarding measures, support and risk mitigation
The Adsafes Safeguarding Framework	A suite of Policies, Guidelines and Practices developed by Adsafes to guide the Church, its affiliated entities, Adsafes and the independent investigators that it engages.
Child	A person under the age of 18 years
Church Company	<p>One of:</p> <ul style="list-style-type: none"> • Seventh-day Adventist Church (Australian Union Conference) Ltd • Seventh-day Adventist Church (Division Services) Ltd • Seventh-day Adventist Church (Greater Sydney) Ltd • Seventh-day Adventist Church (Northern Australia) Ltd • Seventh-day Adventist Church (NNSW) Ltd



Term	Definition
	<ul style="list-style-type: none"> • Seventh-day Adventist Church (South Australia) Ltd • Seventh-day Adventist Church (SNSW) Ltd • Seventh-day Adventist Church (Pacific) Ltd • Seventh-day Adventist Church (South Queensland) Ltd • Seventh-day Adventist Church (SPD) Ltd • Seventh-day Adventist Church (Tasmania) Ltd • Seventh-day Adventist Church (Victoria) Ltd • Seventh-day Adventist Church (Western Australia) Ltd
cvp	Children and Vulnerable Persons
Conference	One of: <ul style="list-style-type: none"> • Greater Sydney Conference • Northern Australian Conference • North New South Wales Conference • North New Zealand Conference • South Australian Conference • South New Zealand Conference • South New South Wales Conference • South Queensland Conference • Tasmanian Conference • Victorian Conference • Western Australian Conference
Safe Place Services Child Protection Policy Framework	A group of policies consisting of: <ul style="list-style-type: none"> • Local Church Policy: Safer Environments for Children and Young People (2014.11) • Local Conference: Safe Place Policy (2013.06) • AUC and NZPUC: Creating a Safe Place Policy (2012.01) • Safe Place Services: Framework for Investigations (2011.01) • Safe Place Adjudication Committee - Terms of Reference (28/11/2012)
South Pacific Division of the Seventh-day Adventist Church (SPD)	A division of the Seventh-day Adventist Church that incorporates Australia, New Zealand, Papua New Guinea and the Islands in the South Pacific
Union	One of: <ul style="list-style-type: none"> • Australian Union Conference of the Seventh-day Adventist church (AUC) • New Zealand Pacific Union Conference of the Seventh-day Adventist church (NZPUC)



Term	Definition
Vulnerable Person	An adult in need of special care, support, or protection because of factors such as age, disability, health status, cultural background, grief, social isolation, financial hardship or previous exposure to abuse or neglect.

7 Legal Principles

The Church has a responsibility to adhere to guiding principles enshrined in legislation (Acts of Parliament) and established tort and civil law (cases based on precedent rulings). These principles include:

- Duty of Care.
- Vicarious Liability.
- Reasonable Standard of Care.
- Reasonable Foresight.
- Negligence.
- Confidentiality and Privacy.
- Procedural Fairness.



8 Key Legislation

The following table outlines key child protection legislation relevant in the given jurisdiction. The local church will comply with all its obligations to these appropriate pieces of legislation.

Table 3: Key Legislation

Jurisdiction	Legislation
Australian Capital Territory	<p>CRIMINAL CODE 2002 (ACT)</p> <ul style="list-style-type: none"> Section 716 - Compounding of offence (All criminal offences from which a person may receive a benefit from silence or non-reporting. – includes Child Sexual Offences) <p>Children and Young People Act 2008 (ACT)</p> <ul style="list-style-type: none"> Mandatory reporting – reporting of sexual, physical or emotional abuse of a child – required by doctor, nurse, teacher. Optional by others. <p>Ombudsman Act 1989</p> <ul style="list-style-type: none"> Reportable Conduct – allegation made against persons engaged in the organisation <p>Working with Vulnerable People (Background Checking) Act 2011</p> <ul style="list-style-type: none"> Persons working with Children and VP need to be registered (WWCC)
New Zealand	<p>Children’s Act 2014</p> <p>Children’s (Requirements for Safety Checks of Children’s Workers) Regulations 2015</p> <ul style="list-style-type: none"> Safety checks on Children’s workers (optional for churches) <p>Oranga Tamariuki Act 2017</p> <ul style="list-style-type: none"> Optional reporting of concerns about the well-being of a child or young person
New South Wales	<p>Crimes Act 1900 (NSW)</p> <ul style="list-style-type: none"> Section 43B – Failure to reduce or remove risk of child becoming victim of child abuse Section 316A - Concealing child abuse offence <p>Children and Young Persons (Care and Protection) Act 1998 (NSW)</p> <ul style="list-style-type: none"> Mandatory Reporting – Reporting sexual, physical, psychological abuse, neglect exposure to DV required by teachers, doctors, nurses only – optional otherwise <p>Children’s Guardian Act 2019</p> <ul style="list-style-type: none"> Reportable Conduct – The investigation of alleged conduct about persons engaged by the organisation (church and schools) <p>Child Protection (Working with Children) Act 2012 (NSW)</p> <ul style="list-style-type: none"> WWCC – must verify persons WWCC number Report findings of sexual misconduct and serious physical abuse to the Office of the Children’s Guardian.



Jurisdiction	Legislation
Northern Territory	<p>CRIMINAL CODE 1983 (NT)</p> <ul style="list-style-type: none"> Section 104 - Compounding indictable offences (All criminal offences from which a person may receive a benefit from silence or non-reporting. – includes Child Sexual Offences) <p>Care and Protection of Children Act 2007 (NT)</p> <p>Care and Protection of Children (Screening) Regulations</p> <ul style="list-style-type: none"> Mandatory Reporting – Reporting sexual abuse or other exploitation, physical, psychological or emotional abuse or neglect of the child required by only health practitioners. Ochre Card – person in child related engagement must hold clearance
Queensland	<p>Criminal Code 1899 (QLD)</p> <ul style="list-style-type: none"> Section 133 -Compounding an indictable offence – (concealing criminal conduct) <p>Child Protection Act 1999 (QLD)</p> <ul style="list-style-type: none"> Mandatory Reporting – Reporting physical and sexual abuse required by only teachers, doctors and nurses - optional otherwise <p>Working with Children (Risk Management and Screening) Act 2000 (Qld)</p> <ul style="list-style-type: none"> Blue Card - Religious representatives involving children – must have current positive notice Churches and schools who are regulated by the blue card system must have a child and youth risk management strategy.
South Australia	<p>Criminal Law Consolidation Act 1935 (SA):</p> <ul style="list-style-type: none"> Section 243 - Fabricating, altering or concealing evidence <p>Children and Young People (Safety) Act 2017</p> <p>Children and Young People (Safety) Regulations 2017</p> <ul style="list-style-type: none"> Mandatory Reporting – Reporting sexual, physical, mental or emotional abuse or neglect by Ministers, employees and volunteers <p>Child Safety (Prohibited Persons) Act 2016</p> <ul style="list-style-type: none"> Not engage persons in child related work without current WWCC Report persons currently engaged to screening unit if circumstances change
Tasmania	<p>Criminal Code Act 1924 (TAS):</p> <ul style="list-style-type: none"> Section 99 - Suppressing evidence Section 102 - Compounding crimes – or concealing a crime Section 162A - Failing to report the killing of a person <p>Children, Young Person’s and their Families Act 1997 (Tas.)</p>



Jurisdiction	Legislation
	<ul style="list-style-type: none"> • Mandatory Reporting – Report abuse or neglect of a child by Principal, Teacher and Minister Registration to Work with Vulnerable People Act 2013 (Tas) <ul style="list-style-type: none"> • Section 53A - Duty of reporting body to notify of reportable behaviour by persons it engages • Persons working with children required to be registered The Family Violence Act 2004 (Tas.) <ul style="list-style-type: none"> • Section 91 - Offence to fail to protect child from harm by a person who has a duty of care in respect of a child
Victoria	Crimes Act 1958 (VIC) <ul style="list-style-type: none"> • Section 327 - Failure to disclose sexual offence against a child • Section 490 – Failure by a person in authority to protect a child from a sexual offence Children, Youth and Families Act 2005 (VIC) <ul style="list-style-type: none"> • Mandatory Reporting – Report physical, sexual abuse, emotional or psychological abuse by Principal, Teacher, Nurse, Doctor • Section 493 - Offence to fail to protect child from harm by a person who has a duty of care in respect of a child Child Wellbeing and Safety Act 2005 (VIC) <ul style="list-style-type: none"> • Reportable Conduct – The notification and investigation of alleged conduct about persons engaged by the organisation (church and schools) Working with Children Act 2005 (VIC) <ul style="list-style-type: none"> • Persons engaged in child related work required to have an assessment notice
Western Australia	Criminal Code Act Compilation Act 1913 (WA): <ul style="list-style-type: none"> • Section 136 - Compounding or concealing offence – concealing criminal conduct including child sexual offences Children and Community Services Act 2004 (WA) <ul style="list-style-type: none"> • Mandatory Reporting – Report sexual abuse of a child by doctor, nurse, teacher Working with Children (Criminal Record Checking) Act 2004 <ul style="list-style-type: none"> • WWCC – not to engage or continue to engage persons without an assessment or with a negative notice

9 Compliance with the Church Manual and Church Policy

“In order to intentionally protect children and the vulnerable from abuse, and be admitted to membership, or maintain membership of the sisterhood of churches, local church congregations must comply with Adsafe child safe policies. These policies are updated periodically as best practices in this area continue to evolve. It is essential to



ensure the version of the policies followed are current.” (SPD Executive Committee Nov 15, 2016)

The Church Manual contains a number of references to the protection of children and vulnerable persons. These are:

Table 4: Church Manual cvp references

Description	Section	Page
A member has been involved as a perpetrator of child abuse	Membership: Letters Granted Only to Those in Regular Standing	53
Perpetrators of sexual abuse	Discipline: Reinstating Those Previously Removed from Membership	67
Meeting Church and legal standards and requirements	Children’s Ministries: Persons working with children	88
Meeting Church and legal standards and requirements	Sabbath School: Teachers: Suitability of teachers	99
Meeting Church and legal standards and requirements	Pathfinders: Suitability of Staff	107
Meeting Church and legal standards and requirements	Adventurer: Suitability of Staff	108
Meeting Church and legal standards and requirements	Adventist Young Ministries: Suitability of Staff	109
Providing a measure of safety and protection for children	Chapter 8 Notes: 8. Safeguarding Children	174 - 5
Protecting Children and vulnerable persons the highest priority	SPD Supplement: D. Children: Nurture, Protection and Empowerment	239 - 240
Sustained finding in an investigation	SPD Supplement: E. Children: Sexual Abuse -1	242
Handling Sexual abuse: important guidelines	SPD Supplement: F. Children: Sexual Abuse - 2	243 - 244

As part of the Constitution of each Church Company there is an imperative to comply with policy developed by the SPD, the AUC or the NZPUC. At present the relevant SPD policies are **ADM.20.45 Child Protection** and **SER.10.55 Adsafe Ltd**



10 Compliance with Adsafes policies, processes and directions.

10.1 Obligatory Policy, Guidelines and Practices

In accordance with SPD Working Policy the local Church and the Church Company cvp policy, guidelines, practices and actions are to comply with Adsafes policies, processes and directions. This generally will be done by the adoption of a suite of Adsafes developed policies, guidelines and practices on behalf of the Church or Church Company. These documents will be designed by Adsafes to be compliant with all legal requirements in the jurisdiction and the stated best practice imperatives in child and vulnerable person protection as found in previously approved Safe Place Service policy, Adsafes policy and Child Safe Standards legislated or recommended by Government bodies.

10.2 Optional Policy, Guidelines and Practice Templates

Adsafes may also develop policy or guideline **templates** that provide a framework for local churches and church companies that (1) provide some obligatory elements and (2) optional elements where the Church or Church Company may devise a local approach.

11 Child Safe Standards

A number of jurisdictions have legislated that organisations providing services to children be compliant to a set of Child Safe Standards. Many of these standards articulate imperatives that are existing in church child protection policy while others are new standards that are not presently addressed in policy.

A recommendation from the Australian Government Royal Commission into Institutional Responses to Child Sexual Abuse is for all Institutions to adopt the National Principles for Child Safe Organisations. These can be found in [Appendix A](#).

Victoria has legislated 3 Guiding principles and 7 Child Safe Standards. These are listed in [Appendix B](#)

South Australia has adopted the South Australian Principles of Good Practice. These are listed in [Appendix C](#).

In Queensland regulated organisations (organisations that run services for children) are required to develop and implement **a child and youth risk management strategy** which aims to keep children and young people safe. These requirements are outlined in [Appendix D](#).



12 Implementation

12.1 Legal Obligations

1. This church or church company will abide by the applicable key legislation listed above through adopting and following Adsafes developed policy and guidelines that articulate legal compliance.

12.2 Compliance with Church Policy

1. This church or church company will abide by the Church Manual, SPD working policies, **ADM.20.45 Child Protection** and **SER.10.55 Adsafes Ltd**, and Adsafes policies, processes and directions as they related to cvp protection.

12.3 Adoption of church policy and guidelines as developed by Adsafes

1. This church or church company will adopt and implement all **obligatory** cvp policy, guidelines and practices developed by Adsafes including updates as and when they are released.
2. This church or church company will adopt and implement all **template** cvp policy, guidelines and practices developed by Adsafes ensuring that **obligatory** elements are adopted unaltered with the understanding that any **optional** elements may be adjusted at the discretion of the church or church company board.
3. The church or church company employees and volunteers will comply with Adsafes directives and follow Adsafes advice as they related to cvp protection.

12.4 Policy Imperatives

This church or church company will, with the assistance of Adsafes, adopt and implement Policy, Guidelines and practices that address the following imperatives:

1. Have systems in place that ensures the **timely adoption and implementation** of child and vulnerable person protection **policy, guidelines and practices** (the cvp protection framework).
2. Have systems in place that ensure **through continual education and training** that volunteers, including persons in governance roles, are **suitably trained and equipped with knowledge, skills and awareness** to keep children and vulnerable persons safe.
3. Have systems in place to ensure that the child and vulnerable person protection framework is **continuously reviewed and improved**.
4. Have systems in place to **regularly assess the risk of abuse** in environments used for church activities and implement plans to **suitably manage** these risks.
5. Have systems in place to ensure that **stakeholders** and particularly cvp **are aware of how to report** cvp protection **complaints or concerns** and that the church's reporting obligations are routinely met.
6. Have systems in place to ensure that **persons working with cvp are suitable** by using a variety of screening techniques before appointment and are supported by **providing appropriate** post appointment **supervision**.
7. Have systems in place to **ensure that cvp protection is a core priority** in the church and is actively **supported by church leadership**, in church governance decisions and by intentionally and strategically working to improve the cvp culture.



8. Have systems in place to ensure that the opinions of cvp are valued and that they are able to participate in any relevant decision-making process.
9. Have systems in place to ensure that families and communities are **appropriately informed and involved in cvp** matters.
10. The diverse nature of our church communities is acknowledged. When responding to cvp protection related matters have systems in place to **ensure due weight is given to these diverse needs** and that this is done **through a framework of equity**.

12.5 Policy Statement

Safeguarding children and vulnerable persons

In order to safeguard our children and vulnerable persons, churches are encouraged to adopt policies that would provide a measure of safety and protection for children. Such policies should include the following:

Risk of abuse mitigation

*For further detail on this section see the document **Risk Mitigation Guidelines – Late 2020***

Two Adult policy

1. It is a requirement that churches have two adults present in children's classrooms or activities. (Church Manual, 2016 edition, page 175)

Human and Environment factors

2. It is required that the board of a church or affiliated entity routinely assess the child and vulnerable person risk of abuse associated with all its activities both human and environmental and specifically with relationship to supervisor-child ratios for all age groups over and above those specified in (1) above.
3. It is required that the board of a church or affiliated entity implement a sign-in sign-out system in programs designed for children under 10 year of age but extended to other age group if the risk is assessed as heightened.

Open Door Policy

4. The church is to have policies and practices that discourage private or one-on-one contact and encourage an open-door policy in all situations. Where an open door is not possible, station a second adult at the door. (Church Manual, 2016 edition, page 175)

Managing Risk when poor conduct is alleged

When poor conduct is alleged by a member of the community the process to bring resolution is difficult and complex. This is because proper resolution involves balancing the following often competing imperatives:

- The needs of the complainant to be heard and for confidentiality, justice, restitution and closure.



- The needs of the wider community for the prosecution of the investigation to deliver a finding and for the timely implementation of the recommendations from the investigation.
- The needs of the person subject of the complaint for procedural fairness, confidentiality and closure.

Given the often-serious nature of the alleged conduct, the complexity of the needs listed above and the fact that the process of resolution will often take time, the risk of harm to a functioning Christian community must be carefully managed. This can be done by implementing the following principles:

5. Disclosures of concerning alleged conduct beside being made to police or the child protection agency in the jurisdiction, should only be made to the **Adsafe Responsible Officer** in the organisation and the matter should not be discussed with other community members. Advice on confidentiality from Police, the child protection agency from Adsafe must be followed.
6. For an initial period, Police, the child protection agency or Adsafe may require Child Protection risk to be managed using increased vigilance (closer monitoring) without the person subject of allegation (PSOA) being notified of the allegation. This is to protect the integrity of the investigation.
7. At an appropriate time the PSOA will be notified of the allegation after which risk will be managed in the organisational context by a confidential interim fellowship agreement and a possible standing-down from roles during the investigation.
8. Once an investigation either internal or external concludes and in the situation where a sustained finding is given, child protection risk needs to be assessed and managed. This responsibility is given to Adsafe and coordinated with the senior leadership team of the organisation. Risk is generally managed either through exclusion, if the risk is too high, or through a confidential fellowship agreement implemented in the local community.

Volunteer and Employee Screening

*For further detail on this section see the document **Role Requirement Guidelines –July 2020***

9. It is required that all staff and volunteers who are new to the congregation or serving for the first time complete a volunteer information form including referees. Those responsible for appointing staff must check these referees, screen the name against the Adsafe database and, if required by law or policy, complete a successful police background check or its equivalent. (Church Manual, 2016 edition, page 175)
10. It is a requirement that those responsible for appointing staff must:
 - a) Develop a detailed job description for the position
 - b) Screen the potential candidates with Adsafe to assess risk
 - c) Check at least three referees including the most recent employer and a referee associated with church attendance.
 - d) Include questions relating to child protection and vulnerable person protection in the interview process.



11. It is a requirement that all church and affiliated entities wishing to appoint persons to an employed or voluntary designated child related position must ensure that the candidate is cleared in a Working With Children Check or its equivalent.

Waiting Period Policy

12. Require a waiting period of **six months** for newly baptized or transferring members who have indicated a willingness to work with children. (Church Manual, 2016 edition, page 175)
13. Require a waiting period of **twelve months** for prospective staff and volunteers who are non-members or who are new to the congregation.

Training

14. The board of a church, church or affiliated entity must ensure that employees and volunteers making governance decisions about its child services or who are working in designated child related roles are to complete training as designated by Adsafe to help them understand and protect children. This must be completed prior to the commencement of the role and updated when the training certification expires. (Church Manual, 2016 edition, page 175)

Code of Conduct

*For further detail on this section see the document **Code of Conduct Guidelines – Nov 2019***

15. All employees and volunteers making governance decisions about the church's child services or who are working in designated child related roles are to sign a Code of Conduct before the commencement of their role and re-sign when the Code of Conduct is updated.

Complaints handling

*For further detail on this section see the document **Complaints Handling Guidelines – late 2020***

16. It is required that the board of a church or affiliated entity implement a procedurally fair process to handle complaints about alleged conduct or Code of Conduct breaches in the organisation that includes but is not limited by:
 - a) Mechanisms that advertise the importance to the organisation that concerns be raised and dealt with and further, how, when and to whom a person can raise a complaint.
 - b) A commitment to confidentiality in the process.
 - c) A commitment to an unbiased decision maker.
 - d) A commitment to a decision based on the evidence gathered.
 - e) A commitment to a resolution.
17. Allegations of Criminal conduct, Investigable conduct and serious breaches of a staff code of conduct must be reported to the appropriate authorities as outlined in 22 - 25 below. No church or affiliated entity complaints investigation should commence until the all-clear is given by these authorities and Adsafe. While the police may choose not to investigate allegations of criminal conduct, Adsafe may



be required by policy to oversee an independent investigation into these allegations under the definition of Investigable conduct.

18. Best practice in the handling of evidence dictates that complainants and witnesses should not be asked to discuss their evidence prior to being interviewed by an investigator. For this reason members of the church community must be asked not to discuss untested matters until an investigation is completed.

Reporting and Notifications

*For further detail on this section see the document **Reporting and Notifications Guidelines – Oct 2020***

19. It is required that the board of a church or affiliated entity designate a **senior officer** to receive all concerns, complaints, allegations or notifications within the organisation and that the mechanism for doing so be displayed prominently in the organisation.
20. Concerned members of the community may and all employees and volunteers must report all allegations of criminal conduct, alleged criminal convictions or other findings, investigable conduct, and breaches of the Code of Conduct to this senior officer. These matters will be dealt with using the complaint handling mechanism listed above.
21. Alternatively concerned members of the community may and all volunteers must report all allegations of criminal conduct, alleged criminal convictions or other findings, investigable conduct, and breaches of the Code of Conduct to Adsafe and seek advice on how to manage the matter.
22. This senior officer will report all alleged criminal conduct to police.
23. This senior officer will report all alleged harm or risk of harm to children to the designated government child protection agency in the jurisdiction
24. All mandatory reporters, either employee or volunteers, in the organisation are to report all alleged harm or risk of harm to children to the designated child protection agency in the jurisdiction.
25. The senior officer is to report all allegations of criminal conduct, alleged criminal convictions or other findings, alleged reportable and investigable conduct, breaches of the Code of Conduct to Adsafe and seek advice on how to proceed with the matter. These matters will be dealt with using the complaint handling mechanism listed above.

Investigations

*For further detail on this section see the document **Investigation Guidelines – Late 2020***

26. The church, any affiliated entity and Adsafe will defer and cooperate with the police on any allegations that are made a police matter.
27. The church and any affiliated entity will cooperate with Adsafe and the appropriate government agency with any Reportable or Investigable Conduct allegations.



28. Reportable conduct allegations must be notified to the appropriate agency, investigated and the final findings from the investigation be notified appropriately. All recommendations from the investigation must be implemented.
29. Investigable conduct allegations must be notified to Adsafe, the investigation oversighted by Adsafe and the recommendations from the investigation must be implemented.
30. Any alleged breaches of the staff Code of Conduct by employees and volunteers must be investigated by Adsafe.
31. Any alleged breaches of a Code of Conduct by members or attendees must be investigated by the church.
32. Any sustained findings from investigations will inform an Adsafe risk assessment and mitigation process

Compliance Reporting

33. The church board or equivalent will have a standing item on its agenda called ***“Child and Vulnerable Person Protection”***. The Church Company Board may delegate the oversight of these matters to a subcommittee of the Board on the condition that the minutes of this subcommittee will be regularly reviewed by the Board.
34. The Adsafe responsible officer will prior to each of these meetings table the following reports for review.
 - a) The role requirements compliance report from the Adsafe Learning Management System (ALMS) (See Role Requirements Guidelines) for the church or church company including the report for all events held.

12.6 Other related policies and guidelines

Please note that there are several other policies that relate to child protection which you need to be aware of and understand including (but not limited to):

1. the Code of Conduct which sets out information about the standards of behaviour expected of all employees and volunteers of a church or church company; and
2. the Work Health and Safety Statement or equivalent which summarises the obligations imposed by work health and safety legislation on the church, employees, volunteers, members and attendees; and
3. the Discrimination, Harassment and Bullying Statement which summarises your obligations in relation to unlawful discrimination, harassment and bullying; and
4. the applicable privacy act for a given jurisdiction. These being Privacy Act 1993 NZ and Privacy Act 1988 Australia

12.7 Implementation Schedule

1. The Church Board or equivalent or the Church Company Board (the board) should complete the following tasks no later than 1 October 2020:
 - a) approve the Child Protection Policy
 - b) appoint an Adsafe Responsible Officer.



12.8 Safeguarding Framework Guidelines

There are three types of guideline documents attached to this policy that form part of the child and vulnerable person protection framework. These are:

Roles, Responsibilities and Processes

This type of guideline outlines the staff who will have responsibility for the implementation of the guideline and what processes are required for this implementation.

Frequently Asked Questions

This type of guideline provides information for staff on the purpose of the guideline and answers any questions around how the guideline will be implemented.

Checklists, Templates and Tools

This type of guideline provides information for the church and wider community members on why the guideline is important to the church and answers any basic questions on how the guideline will be implemented.

The following table outlines the attached Guidelines that are part of the child protection framework for the Church Company. The symbol in the table indicates the status of the guideline. The following legend provides a guide for the symbols used.

= Draft Guideline developed in this project

= Scheduled for development in this project

✓ = Existing Guidelines developed prior to this project



Table 5: *Adsafe Safeguarding Framework: Planned documents*

Item	Roles, Responsibilities and processes	FAQ	Templates, Checklists and Tools
<p><i>Core Child and Vulnerable Person Protection Policies</i> Policies that inform churches and church companies</p>			
<p>Child Protection Policy - <i>Sept 2019</i> Local Churches and Church Companies</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<p><i>Core Child Protection Guidelines</i> Guidelines that inform churches and church companies</p>			
<p>Role Requirement Guidelines - <i>Sept 2019</i> Local Churches and Church Companies</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<p>Reporting and Notifications Guidelines – <i>Nov 2020</i> Local churches, church companies and affiliated entities</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Risk Mitigation Guidelines - <i>Late 2020</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Code of Conduct Guidelines - <i>Nov 2019</i> Local Churches and Church Companies</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<p>Governance Guidelines - <i>Late 2020</i> Local Churches and Church Companies</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>WWCC guideline - <i>Late 2020</i> Local churches, church companies and affiliated entities</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Mandatory Reporting - <i>Late 2020</i> Local churches, church companies and affiliated entities</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>Adsafe Polices and Guidelines</i> Policies and Guidelines that inform Adsafe’s work</p>			
<p>Guidelines for Conducting Investigations</p>	<input type="checkbox"/>		
<p>Survivor Support Guidelines</p>	<input type="checkbox"/>	<input type="checkbox"/>	



Item	Roles, Responsibilities and processes	FAQ	Templates, Checklists and Tools
Risk Mitigation Guidelines	<input type="checkbox"/>	<input type="checkbox"/>	
Training Guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Complaints handling guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Privacy Guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Guidelines handled outside the cvp Protection framework</i>			
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Appendix A: National Principles for Child Safe Organisations

Table 6: National Principles implementation

Principle	Safeguarding framework
<p>1 Child safety and wellbeing is embedded in organisational leadership, governance and culture.</p> <p>1.1 The organisation makes a public commitment to child safety.</p> <p>1.2 A child safe culture is championed and modelled at all levels of the organisation from the top down and the bottom up.</p> <p>1.3 Governance arrangements facilitate implementation of the child safety and wellbeing policy at all levels.</p> <p>1.4 A Code of Conduct provides guidelines for staff and volunteers on expected behavioural standards and responsibilities.</p> <p>1.5 Risk management strategies focus on preventing, identifying and mitigating risks to children and young people.</p> <p>1.6 Staff and volunteers understand their obligations on information sharing and recordkeeping.</p>	<p>Child and Vulnerable Person Protection Policy Governance Guidelines Code of Conduct Guidelines Risk Mitigation Guidelines</p>
<p>2 Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.</p> <p>2.1 Children and young people are informed about all of their rights, including to safety, information, and participation.</p> <p>2.2 The importance of friendships is recognised and support from peers is encouraged, to help children and young people feel safe and be less isolated.</p> <p>2.3 Where relevant to the setting or context, children may be offered access to sexual abuse prevention programs and to relevant related information in an age appropriate way.</p> <p>2.4 Staff and volunteers are attuned to signs of harm and facilitate child-friendly ways for children to express their views, participate in decision-making and raise their concerns.</p>	<p>Child and Vulnerable Person Protection Policy Governance Guidelines</p>
<p>3 Families and communities are informed, and involved in promoting child safety and wellbeing.</p> <p>3.1 Families participate in decisions affecting their child.</p>	<p>Child and Vulnerable Person Protection Policy Governance Guidelines</p>



Principle	Safeguarding framework
<p>3.2 The organisation engages and openly communicates with families and the community about its child safe approach and relevant information is accessible.</p> <p>3.3 Families and communities have a say in the development and review of the organisation's policies and practices.</p> <p>3.4 Parents, caregivers and the community are informed about the organisation's operations and governance.</p>	
<p>4 Equity is upheld and diverse needs respected in policy and practice.</p> <p>4.1 The organisation, including staff and volunteers, understands children and young people's diverse circumstances, and provides support and responds to those who are vulnerable.</p> <p>4.2 Children and young people have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.</p> <p>4.3 The organisation pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and lesbian, gay, bisexual, transgender and intersex children and young people.</p>	<p>Child and Vulnerable Person Protection Policy Governance Guidelines</p>
<p>5 People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.</p> <p>5.1 Recruitment, including advertising, referee checks and staff and volunteer pre-employment screening, emphasise child safety and wellbeing.</p> <p>5.2 Relevant staff and volunteers have current working with children checks or equivalent background checks.</p> <p>5.3 All staff and volunteers receive an appropriate induction and are aware of their responsibilities to children and young people, including record keeping, information sharing and reporting obligations.</p> <p>5.4 Ongoing supervision and people management is focused on child safety and wellbeing.</p>	<p>Role Requirement Guidelines Reporting and Notifications Guidelines Privacy Guidelines</p>



Principle	Safeguarding framework
<p>6 Processes to respond to complaints and concerns are child focused.</p> <p>6.1 The organisation has an accessible, child focused complaint handling policy which clearly outlines the roles and responsibilities of leadership, staff and volunteers, approaches to dealing with different types of complaints, breaches of relevant policies or the Code of Conduct and obligations to act and report.</p> <p>6.2 Effective complaint handling processes are understood by children and young people, families, staff and volunteers, and are culturally safe.</p> <p>6.3 Complaints are taken seriously, and responded to promptly and thoroughly.</p> <p>6.4 The organisation has policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and co-operates with law enforcement.</p> <p>6.5 Reporting, privacy and employment law obligations are met.</p>	<p>Complaints Handling Guidelines</p> <p>Reporting and Notifications Guidelines</p> <p>Privacy Guidelines</p>
<p>7 Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.</p> <p>7.1 Staff and volunteers are trained and supported to effectively implement the organisation’s child safety and wellbeing policy.</p> <p>7.2 Staff and volunteers receive training and information to recognise indicators of child harm including harm caused by other children and young people.</p> <p>7.3 Staff and volunteers receive training and information to respond effectively to issues of child safety and wellbeing and support colleagues who disclose harm.</p> <p>7.4 Staff and volunteers receive training and information on how to build culturally safe environments for children and young people.</p>	<p>Role Requirement Guidelines</p>
<p>8 Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.</p> <p>8.1 Staff and volunteers identify and mitigate risks in the online and physical environments without</p>	<p>Risk Mitigation Guidelines</p>



Principle	Safeguarding framework
<p>compromising a child’s right to privacy, access to information, social connections and learning opportunities.</p> <p>8.2 The online environment is used in accordance with the organisation’s Code of Conduct and child safety and wellbeing policy and practices.</p> <p>8.3 Risk management plans consider risks posed by organisational settings, activities, and the physical environment.</p> <p>8.4 Organisations that contract facilities and services from third parties have procurement policies that ensure the safety of children and young people.</p>	
<p>9 Implementation of the national child safe principles is regularly reviewed and improved.</p> <p>9.1 The organisation regularly reviews, evaluates and improves child safe practices.</p> <p>9.2 Complaints, concerns and safety incidents are analysed to identify causes and systemic failures so as to inform continuous improvement.</p> <p>9.3 The organisation reports on the findings of relevant reviews to staff and volunteers, community and families and children and young people.</p>	<p>Child and Vulnerable Person Protection Policy Governance Guidelines</p>
<p>10 Policies and procedures document how the organisation is safe for children and young people.</p> <p>10.1 Policies and procedures address all national child safe principles.</p> <p>10.2 Policies and procedures are documented and easy to understand.</p> <p>10.3 Best practice models and stakeholder consultation informs the development of policies and procedures.</p> <p>10.4 Leaders champion and model compliance with policies and procedures.</p> <p>10.5 Staff and volunteers understand and implement policies and procedures.</p>	<p>Child and Vulnerable Person Protection Policy Governance Guidelines</p>



Appendix B: 7 Victorian Child Safe Standards

Overarching Principles

To comply with the compulsory Victorian Child Safe Standards, an organisation must include the following principles as part of each standard:

P1 promoting the cultural safety of Aboriginal children.

You can promote the cultural safety of Aboriginal by:

- P1.1 ensuring your organisation clearly demonstrates a zero tolerance to discrimination
- P1.2 being respectful, inclusive and welcoming of families from an Aboriginal background
- P1.3 recognising times of importance within the Aboriginal cultures
- P1.4 ensuring the physical environment has a positive image of a range of cultures, in terms of decoration and artwork
- P1.5 employing staff that are representative of your local community
- P1.6 actively seeking out and talking to families about how they would like to be involved
- P1.7 asking about the best way to provide information to children and families.

P2 promoting the cultural safety of children from culturally and/or linguistically diverse backgrounds.

You can promote the cultural safety of children from culturally and/or linguistically diverse backgrounds by:

- P2.1 ensuring your organisation clearly demonstrates a zero tolerance to discrimination
- P2.2 being respectful, inclusive and welcoming of families from a range of backgrounds
- P2.3 recognising times of importance to different cultures
- P2.4 ensuring the physical environment has a positive image of a range of cultures, in terms of decoration and artwork
- P2.5 employing staff that are representative of your local community
- P2.6 actively seeking out and talking to families about how they would like to be involved
- P2.7 asking about the best way to provide information to children and families.

P3 promoting the safety of children with a disability.

You can promote the safety of children with a disability by:

- P3.1 acknowledging that children with a disability are particularly vulnerable and ensure your risk assessment process considers their needs
- P3.2 ensuring your organisation clearly demonstrates a zero tolerance to discrimination and actively welcomes all children
- P3.3 making sure the environment does not pose access difficulties



Child Safe Standards

Table 7: Victorian Child Safe Standards Implementation

Child Safe Standard	Safeguarding Framework
<p>CSS 1: Strategies to embed an organisational culture of child safety, including through effective leadership arrangements</p> <p>Strong and clear governance arrangements allow leaders to ensure child safety is a focus within their organisation.</p> <p>This includes:</p> <ul style="list-style-type: none"> 1.1 leading from the top and embedding a culture that makes child safety paramount 1.2 applying strong governance, documenting how duty of care responsibilities to children will be met 1.3 making child safety a top priority in the organisation's operations 1.4 taking a zero-tolerance approach to child abuse 1.5 respecting, embracing and supporting the diversity of children. 	<p>Child and Vulnerable Person Protection Policy</p> <p>Governance Guidelines</p>
<p>CSS 2: A Child Safe Policy or Statement of Commitment to Child Safety</p> <p>It is important for an organisation to demonstrate its commitment to child safety by documenting how it will meet its duty of care and responsibilities to children.</p> <p>This includes:</p> <ul style="list-style-type: none"> 2.1 having a Child Safe Policy or Statement of Commitment to Child Safety 2.2 making its commitment clear and well communicated to staff, volunteers, children, families and the community 2.3 requiring all staff and volunteers to uphold this approach. 	<p>Child and Vulnerable Person Protection Policy</p>
<p>CSS 3: A code of conduct that establishes clear expectations for appropriate behaviour with children</p> <p>A child safe code of conduct should spell out what types of behaviour are appropriate and inappropriate. It does not need to be an exhaustive list, but should provide overarching guidelines about behaviour expectations. It can:</p> <ul style="list-style-type: none"> 3.1 provide clear written guidance on appropriate conduct and behaviour towards children 3.2 detail acceptable and unacceptable behaviours relating to the specific context of an organisation – for example physical contact, personal care, online 	<p>Code of Conduct Guidelines</p>



Child Safe Standard	Safeguarding Framework
<p>communication, professional boundaries or complying with organisational policy and procedures</p> <p>3.3 educate staff, volunteers, parents and children about the expected standards of behaviour and what will happen if a person does not comply</p> <p>3.4 assist organisations to act on concerns or allegations of non-adherence to the code of conduct.</p>	
<p>CCS 4: Screening, supervision, training and other human resources practices that reduce the risk of child abuse by new and existing personnel</p> <p>This includes:</p> <p>4.1 promoting the organisation’s commitment to child safety</p> <p>4.2 having clear duty statements</p> <p>4.3 having robust recruitment and assessment to engage only the most suitable people to work with children and deterring unsuitable people</p> <p>4.4 providing high quality supervision and professional development for staff and volunteers.</p>	<p>Role Requirement Guidelines</p>
<p>CSS 5: Processes for responding to and reporting suspected child abuse</p> <p>Organisations have a responsibility to promote and provide an environment in which children, staff and volunteers are encouraged to speak up when they are uncomfortable or concerned.</p> <p>This includes:</p> <p>5.1 recognising that the safety of children is everyone’s responsibility</p> <p>5.2 having a clear procedure for reporting concerns and allegations</p> <p>5.3 encouraging children to report if they feel unsafe or concerned</p> <p>5.4 making people within the organisation aware of their duty of care and legal responsibilities</p> <p>5.5 appropriately acting on concerns and complaints</p> <p>5.6 keeping and securely storing accurate records.</p>	<p>Reporting and Notifications Guidelines</p>



Child Safe Standard	Safeguarding Framework
<p>CSS 6: Strategies to identify and reduce or remove risks of child abuse</p> <p>Risk assessment</p> <p>Creating a child safe organisation begins with a clear understanding of the potential risks to children in an organisation's setting – what could go wrong and what you can do to reduce or remove these risks.</p> <p>To reduce the likelihood of harm, think about and define your organisations risks.</p> <p>This includes:</p> <ul style="list-style-type: none"> 6.1 thinking about your organisation, its activities and the services it provides to children 6.2 planning how to make activities as safe as possible 6.3 being proactive to reduce the likelihood of risks. 	<p>Risk Mitigation Guidelines</p>
<p>CCS 7: Strategies to promote the participation and empowerment of children</p> <p>Enabling and promoting the participation of children includes:</p> <ul style="list-style-type: none"> 7.1 supporting children and young people to understand their rights, contribute to child safety planning and raise concerns 7.2 promoting and encouraging children's participation in decision-making 7.3 valuing and respecting children's opinions 7.4 seeking children's views about what makes them feel safe and unsafe 7.5 establishing an environment of trust and inclusion that enables children to ask questions and speak up if they are worried or feeling unsafe. 	<p>Child and Vulnerable Person Protection Policy Governance Guidelines</p>



Appendix C: South Australian Principles of Good Practice

Table 8: South Australian Principles Implementation

Principle	Safeguarding Framework
<p>1: Identify and analyse risk of harm</p> <p>The organisation develops and implements a risk management strategy that identifies, assesses and takes steps to minimise the risks of harm to children because of the action or inaction of a person involved with the organisation (such as an employee, volunteer, or another child.)</p>	<p>Risk Mitigation Guidelines</p>
<p>2: Develop a clear and accessible child safe policy</p> <p>The organisation has a child safe environments (child protection) policy that outlines its commitment to promoting children’s wellbeing and safeguarding children from harm.</p>	<p>Child and Vulnerable Person Protection Policy</p>
<p>3: Develop codes of conduct for adults and children</p> <p>The organisation has a code of conduct that specifies standards of conduct and care when dealing and interacting with children, particularly those in the organisation’s care. The organisation also has a code of conduct to address appropriate behaviour between children.</p>	<p>Code of Conduct Guidelines</p>
<p>4: Choose suitable employees and volunteers</p> <p>The organisation takes all reasonable steps to ensure that it engages the most suitable and appropriate people to work with children (in prescribed positions).</p> <p>This is more likely to be achieved using a range of screening measures. Such measures aim to minimise the likelihood of engaging (or retaining) people who are unsuitable to work with children.</p> <p>If a criminal history report is obtained as part of the screening process, the organisation must ensure that the criminal history information is dealt with in accordance with the Standards developed by the Chief Executive, Department for Education and Child Development.</p> <p>Where criminal history assessments are required by law, the organisation must ensure that a satisfactory criminal history assessment is conducted for all persons undertaking prescribed functions at agency-defined intervals up to a maximum validity period of three years.</p>	<p>Role Requirement Guidelines</p>



Principle	Safeguarding Framework
<p>5: Support, train, supervise and enhance performance</p> <p>The organisation ensures that volunteers and employees who work with children or their records have ongoing supervision, support and training such that their performance is developed and enhanced to promote the establishment and maintenance of a child safe environment.</p>	<p>Role Requirement Guidelines Mandatory Reporting Guidelines</p>
<p>6: Empower and promote the participation of children in decision-making and service development</p> <p>The organisation promotes the involvement and participation of children and young people in developing and maintaining child safe environments.</p>	<p>Child and Vulnerable Person Protection Policy Governance Guidelines</p>
<p>7: Report and respond appropriately to suspected abuse and neglect</p> <p>The organisation ensures that volunteers and employees are able to identify and respond to children at risk of harm.</p> <p>The organisation makes all volunteers and employees aware of their responsibilities under the Children’s Protection Act 1993 if they have suspicion on reasonable grounds that a child has been or is being abused or neglected.</p>	<p>Reporting and Notifications Guidelines Mandatory Reporting Guidelines</p>



Appendix D: Queensland's Child and Youth Risk management strategy

To comply with the legislative framework, a child and youth risk management strategy must include eight minimum requirements. These requirements:

1. address an organisation's commitment to creating a safe and supportive service environment
2. strengthen an organisation's capability to provide such an environment
3. assist an organisation to manage any particular concerns with respect to the safety and wellbeing of children and young people who are involved with the organisation, and promote the consistency of an organisation's approach to risk management, both within the organisation and with respect to compliance with the requirements under the Act.

The eight requirements are:

Table 9: Queensland's risk management strategy implementation

Requirement and Description	Safeguarding Framework
Commitment	
1. A statement of commitment to the safety and wellbeing of children and the protection of children from harm, and	Child and Vulnerable Person Protection Policy
2. A code of conduct for interacting with children.	Code of Conduct Guidelines
Capability	
3. Written procedures for recruiting, selecting, training and managing staff and volunteers.	Role Requirement Guidelines
Concerns	
4. Policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines	Reporting and Notifications Guidelines
5. A plan for managing breaches of your risk management strategy, and	Risk Mitigation Guidelines
6. Risk management plans for high risk activities and special events.	Risk Mitigation Guidelines
Consistency	
7. Policies and procedures for managing compliance with the blue card system, and	WWCC guideline
8. Strategies for communication and support.	Reporting and Notifications Guidelines