



Grace Hills Church

MOUNT BARKER

Child Safe Environments Policy

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Attention:

Report suspicion that a child or young person is at risk of harm to the
Child Abuse Report Line: 131 478

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1. Introduction

1.1. Purpose

This document defines the policy of *Grace Hills Church Incorporated* (henceforth referred to as GHC) with respect to creation of a safe environment for children and young people who interact with GHC workers according to the requirements of the *Children and Young People (Safety) Act 2017 (SA)* and associated regulations. As such it describes the roles and responsibilities of all those involved with GHC in relation to protection of children and young people with the following specific objectives:

- To create and maintain an organisational environment that is free from any harassment and exploitation of children and young people.
- To, as far as possible, protect children by minimising the risk of harm to children and young people.
- To ensure that all known or suspected cases of harm to children or young people are addressed in a professional, consistent and accountable manner.
- To ensure compliance with all South Australian child protection legislation including mandatory notification requirements.

1.2. Commitment to the Safety of Children and Young People

Consistent with SA legislation and in accordance with Christian principles relating to care and protection of children, GHC affirms that children are God-given and precious and that GHC has a responsibility to provide a positive and godly influence, to care and protect from harm or risk of harm. This accords with Christ's mandate in the Gospel of Matthew 18:10, "*See that you do not despise one of these little ones.*"

As such GHC is committed to:

- Providing an environment that is safe for children and young people. This is a first priority.
- Ensuring that this policy complies with the child safe environments provisions of the *Children and Young People (Safety) Act 2017*, *Child Safety (Prohibited Persons) Act 2016* and is guided by the *National Principles for Child Safe Organisations*.
- Communicating to children and young people their value and intrinsic worth and creating an environment where they are protected, informed, and feel at liberty to participate and contribute in all matters affecting them.
- Communicating the love and grace of God that shows no partiality and embraces all children and young people regardless of abilities, appearance, gender, background, and other differences.

1.3. Scope

This policy applies to **all** GHC Management, Board Members, Employees, and Leaders— whether paid or not. In addition, the policy applies to GHC members, volunteers, contractors and other workers where they interact with or are likely to interact with children and young people, or deal with information about children or young people. Such people are referred to as *Workers* or *Prescribed Persons* throughout this policy document.

For all such *Workers (Prescribed Persons)* it is a requirement that they formally agree to and accept in writing a commitment to act in accordance with this policy.

1.4. Definitions

Terms that have specific meaning within the context this policy are summarised here.

Term	Definition
CARL	Child Abuse Report Line — telephone number: 131 478
Child or Young Person	In line with the Children and Young People (Safety) Act 2017 (SA), a child or young person is a person under the age of 18 years of age.
DCP	South Australian Department for Child Protection.
DHS	South Australian Department for Human Services.
Contractor	Person external to GHC who is engaged to provide a specified service.
GHC	Grace Hills Church Incorporated.
GHC Board	Grace Hills Church governing body consisting of the Senior Pastor and appointed Elders.
GHC CEO	Grace Hills Church Chief Executive Officer — commonly known as the Senior Pastor. The CEO is also a member of the GHC Board.
GHC Code of Conduct	Requirements to which all <i>Prescribed Persons</i> must adhere and indicate agreement by signing. The <i>Code of Conduct</i> is included in <i>Appendix A</i> of this document.
GHC Child Safety Officer	Specific role responsible directly to the GHC CEO to promote, encourage, inform and support GHC <i>Workers</i> and attendees in their responsibilities toward children and young people, and to initiate and oversee programs and initiatives that support the child-safety objectives described in Section 1.1 of this Policy.
GHC Member	A person formally received into membership of GHC.
Harm	Physical or psychological harm (whether caused by an act or omission), including harm caused by sexual, physical, mental or emotional abuse or neglect.
Leader	Those who have oversight, supervision or key leadership responsibilities — paid or voluntary.
Mandated Notifier	A person identified in Section 30 of the Children and Young People (Safety) Act as a <i>Mandated Notifier</i> . In particular, this includes ministers of religion and any employee of or volunteer in an organisation formed for religious or spiritual purposes which includes GHC, and officers or employees of a prescribed organisation (as per section 114) who holds a management position in the organisation, the duties of which include direct responsibility for, or direct supervision of, the provision of services to children.
Prescribed Organisation	Person or body who provides a service or undertakes an activity that constitutes child-related work under the <i>Child Safety (Prohibited Persons) Act 2016</i> . Since it specifically includes religious organisations, GHC is a Prescribed Organisation.
Prescribed Person	A person who occupies a <i>Prescribed Position</i> — the term <i>Worker</i> is also used synonymously in this document. See definition of <i>Worker</i> for further detail.
Prescribed Position	A position in which a person works or is likely to work with children including: <ul style="list-style-type: none"> ▪ A person who has regular contact with children or working in close proximity to children on a regular basis. ▪ A person who is in a supervising or management role of persons in positions requiring or involving regular contact with children or working in close proximity to children on a regular basis. ▪ A person who has access to GHC records or other information that relates to children.
Employee	A person in paid employment, performing any role in GHC.
Volunteer	Unpaid persons performing any work in GHC — Volunteers may or may not be classified as <i>Workers</i> as described in definition of <i>Worker</i> .
Worker	In this document <i>Worker</i> specifically refers to any person working with children or engaged in child-related work as defined in the <i>Child Safety (Prohibited Persons) Act 2016</i> . Essentially, it includes all those who work in a <i>Prescribed Position</i> . It thus includes GHC Board Members, leaders, and employees. It also includes volunteers and contractors except those whose work would reasonably be expected to involve no contact or only incidental contact with children, or roles where a child's parent or guardian has oversight of the child at the activity and accompanies the child in the course of such an activity. Examples of such exceptions include Ushers at a church service, Barista at the Church Café, or a activity facilitator or administrator where the parent or guardian accompanies the child.
WWCC	Working with Children Check — issued by the Screening Unit of the Department of Human Services.

Table 1 — Definitions

1.5. References

Important documents that are referenced in this policy are summarised here.

Reference		Description
1	Children and Young People (Safety) Act 2017	SA legislation to protect children and young people from harm; to provide for children and young people who are in care; and for other purposes.
2	Child Safety (Prohibited Persons) Act 2016	SA legislation to minimise the risk to children posed by persons who work or volunteer with them; to provide for the screening of persons who want to work or volunteer with children; to provide for a system of accountability for persons working or volunteering with children; to prohibit those who pose an unacceptable risk to children from working or volunteering with children; to provide for a central assessment unit to undertake screening of persons who want to work or volunteer with children; and for other purposes.
3	National Principles for Child Safe Organisations	A set of ten principles that provide a national approach to embedding a child safe culture across all sectors of Australian society in which children are involved.
4	Mandatory Notification Information Booklet	An easy-to-understand information booklet, issued by the Department of Human Services, including signs and indications that children or young people may be at risk of harm.

Table 2 — References

2. Policy and Procedure

2.1. Roles and Responsibilities

The following roles have specific responsibilities with respect to child protection within the context of this policy. See *Table 1* for definitions.

Role	Primary Responsibilities
Child Abuse Report Line Contact: 131 478	Receive and process reports of suspicion that a child or young person is at risk.
GHC CEO GHC Board Members	<ul style="list-style-type: none"> ▪ Custodian of this <i>Policy</i>. ▪ Agree with and sign the <i>Code of Conduct</i> that affirms commitment to comply with the provisions of this <i>Policy</i>. ▪ Maintain a valid <i>Working with Children Check</i> status. ▪ Report to the CARL any reasonable suspicion that a child or young person is at risk. ▪ Ensure that all <i>Prescribed Persons (Workers)</i> comply with this policy and in particular undergo a <i>Working with Children Check</i> and sign the <i>GHC Code of Conduct</i>. ▪ Provide oversight and promote communication and awareness of child protection responsibilities. ▪ Lead by example in relation to child protection responsibilities.
GHC Child Safety Officer	<ul style="list-style-type: none"> ▪ Agree with and sign the <i>Code of Conduct</i> that affirms commitment to comply with the provisions of this <i>Policy</i>. ▪ Maintain a valid <i>Working with Children Check</i> status. ▪ Report to the CARL any suspicion that a child or young person is at risk. ▪ Promote a culture of care, protection, encouragement and support of children and young people. ▪ On behalf of the Board, promote awareness of child safety responsibilities and commitments. ▪ On behalf of the Board, promote, encourage, inform and support <i>GHC Workers</i> and attendees in their responsibilities toward children and young people, and initiate and oversee programs and initiatives that support the child-safety objectives described in Section 1.1 of this <i>Policy</i>. ▪ Receive and respond to complaints and feedback related to child safety and wellbeing. ▪ Initiate reviews of this <i>Policy</i> document as required. ▪ Maintain <i>Register of Workers, Register of Notifications, Register of Training, Register of Complaints and Feedback</i> and <i>Risk Management Register</i>.
GHC Employee, Leader, Worker	<ul style="list-style-type: none"> ▪ Agree with and sign the <i>Code of Conduct</i> that affirms commitment to comply with the provisions of this <i>Policy</i>. ▪ Maintain a valid <i>Working with Children Check</i> status. ▪ Report to the CARL any suspicion that a child or young person is at risk. ▪ Promote a culture of care, protection, encouragement and support of children and young people.
GHC Volunteer who meets definition of a <i>Worker</i>	<ul style="list-style-type: none"> ▪ Agree with and sign the <i>Code of Conduct</i> that affirms commitment to comply with the provisions of this <i>Policy</i>. ▪ Maintain a valid <i>Working with Children Check</i> status. ▪ Report to the CARL any suspicion that a child or young person is at risk. ▪ Promote a culture of care, protection, encouragement and support of children and young people.
Contractor who meets definition of a <i>Worker</i>	<ul style="list-style-type: none"> ▪ Agree with and sign the <i>Code of Conduct</i> that affirms commitment to comply with the provisions of this <i>Policy</i>. ▪ Maintain a valid <i>Working with Children Check</i> status. ▪ Report to the CARL any suspicion that a child or young person is at risk.
Mandated Notifier	<ul style="list-style-type: none"> ▪ Legally obliged to report to the CARL any suspicion that a child or young person is at risk.

Table 3 — Roles and Responsibilities

2.2. Communication

It is our intention to ensure that this policy is available to all relevant parties and communicated in a manner that facilitates understanding — particularly by those who have specific responsibilities with respect to safety of children and young people. In particular, our communication responsibilities are addressed as follows.

- In accordance with SA legislation GHC will make available to anyone upon request a copy of this policy and make it accessible via GHC's on-line presence or in printed form.
- All *Workers (Prescribed Persons)* will be required to sign a statement that they have read this policy and will comply with its requirements.
- Programs for children and young people will always include, in an age-appropriate manner, communication about protections and support available to them, and opportunity for them to express ideas and concerns relating to their safety and wellbeing.
- A one-page summary page, and other material as required, will be posted on GHC premises reminding any attending both of the existence and availability of this policy, and our collective responsibility to maintain a safe environment for children and young people.
- Information about this policy will be communicated to the parent or guardian of each child or young person involved in GHC programs.
- As part of GHC's teaching and proclamation of the Gospel we will not neglect to remind hearers about God's special concern for the vulnerable and needy which includes, in particular, children and young people — and our responsibility to protect, encourage and support them.

2.3. Participation of Families, Children and Young People

A significant aspect of the communication process includes informing families, children and young people about their rights and responsibilities and encouraging them to participate and provide feedback as expressed in *Principle Two* of the *National Principles of Child Safe Organisations*: "Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously."

In addition to the commitments in Section 2.2 on Communication:

- GHC encourages and provides opportunities for children, young people, and families to give feedback on services and programs as part of those programs. Such feedback mechanisms may include use of surveys as well as email and personal conversations.
- GHC has procedures in place that allow children, young people, and their families to safely and confidentially report complaints, concerns and provide feedback — as specified in the Sections on *Reporting and Responding to Harm or Risk of Harm* and *Reporting and Responding to Complaints or Feedback*.

2.4. Code of Conduct

The *Code of Conduct* defines the minimum and expected behaviour required of all *Workers* in GHC. Its importance and significance to GHC is evidenced by the following commitments:

- All *Workers* are required to read and acknowledge their commitment to support and abide by the *Code of Conduct*. This will be formalised by signing a copy of the Code, which will be maintained as part of GHC Records (see Section on *Forms and Records*).
- The Code of Conduct is made available as part of this policy document but will also be published as a stand-alone paper that is communicated to and reviewed annually by all *Workers*.
- A mechanism for reporting breaches is detailed in the Section on *Reporting and Responding to Harm or Risk of Harm*. Reporting is accessible to any person and in particular includes families, children and young people.
- Any breaches or alleged breaches of the *Code of Conduct* will be investigated by the GHC Board or its delegate as detailed in the Section on *Reporting and Responding to Harm or Risk of Harm*.
- For minor breaches a *Worker* may be given the opportunity to correct the offending behaviour, but more serious breaches will result in termination. Details are provided in the Section on *Reporting and Responding to Harm or Risk of Harm*.

2.5. Recruitment

Applicants for roles that involve working with children or young people are carefully assessed to ensure their suitability as expressed in *Principle Five* of the *National Principles of Child Safe Organisations*: “People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.”

To align with this *Principle* and to comply with the *Child Safety (Prohibited Persons) Act 2016*, GHC follows a well-defined recruitment process involving the following steps.



Job Description

- If the application is for a *Prescribed Position* as defined in this *Policy*, GHC’s standard *Job Description* must clearly describe the nature of the role and its responsibilities with respect to this *Policy*. This includes the commitment to child safety and wellbeing.

Application

- An applicant must submit an *Application Form* as described in *Section 3.1* and provide evidence of general suitability by including references and qualifications that may be relevant to the role.

Selection

- The applicant must be interviewed face-to-face by a person or persons (assessor) delegated by the GHC CEO to explore general suitability for the position.
- The submitted references and qualifications are checked and assessed — this can include checks with previous employers or managers for whom the applicant has worked in a *Prescribed Position*.
- If the applicant is assessed as being suitably qualified for the position, a provisional selection is made by the assessor and needs to be ratified by the GHC CEO or delegate. This is then communicated to the applicant.

Screening

- As required by the *Child Safety (Prohibited Persons) Act 2016* all persons applying for a *Prescribed Position* must have a valid *Working with Children Check* issued by the Screening Unit of the Department of Human Services. Hence, the provisionally-selected applicant must obtain such a *Working with Children Check* to proceed further.
- *Working with Children Checks* are valid for a five-year period and must be renewed prior to expiry if the worker is to continue in that role.
- If during the process of recruitment information relating to any serious criminal offence, child protection concerns, misconduct or disciplinary action comes to the attention of the interviewers or assessors, then the Screening Unit will be advised.

Agreement

- Once the *Working with Children Check* is received the applicant must affirm agreement with this *Policy* and the *Code of Conduct* by signing the *Code of Conduct* which is included in Appendix A¹.
- The *Application Form* and corresponding signed agreements are stored as records.

¹ Note that the Code of Conduct includes commitment to comply with this *Policy*.

Induction

- The induction includes a training session that specifically reviews the *Code of Conduct* and addresses the new Worker's responsibilities with respect to this *Policy* — in particular, the responsibilities toward children and young people, including record keeping, information sharing and reporting obligations.
- The new Worker's performance, in relation to the *Code and Conduct* and this *Policy*, is assessed by the leader or manager after a probationary period as determined by the *GHC Board*. If during this period GHC becomes aware of any serious criminal offence or misconduct that would jeopardise the safety or wellbeing of children or young people, the worker will be terminated and the Screening Unit will be advised. Further details of reporting and response to harm or risk of harm are provided in the next section.

Occasionally, additional volunteers or contractors may be engaged to provide support in relation to short-term special events and activities. These people are outside the scope of the formal *Recruitment* process but must nevertheless:

- Be authorised by the GHC CEO or delegate for each such activity.
- Attend an *induction session* that outlines their responsibilities in relation to child and young person safety.
- Always be accompanied by a *Worker (Prescribed Person)* when interacting with children.

2.6. Supervision, Training and Support

GHC is committed to ensure adequate supervision, training and support of *Workers* as expressed by *Principles Five and Seven* of the *National Principles of Child Safe Organisations*: “People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice” and “are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.”

GHC has strategies in place to meet this requirement by equipping and overseeing *Workers* so that this Policy and its implications are properly understood and enacted. In particular, these include the following.

- Supervision:
 - Wherever possible, two or more adults should be present for any activity involving children. At least one should always be an authorised *Worker*. The other may be a *Worker* or parent or guardian of one or more of the children present.
 - Children should attend to personal needs by themselves where possible. If a child requires assistance of a personal nature (such as toileting) and a parent or guardian is not available, then two *Workers* should be present.
 - Written consent is required from the child’s parent or guardian for a child’s involvement in any GHC programs or activities.
 - Annual performance reviews of *Workers* will include an assessment of compliance to this Policy.
- Training:
 - All new *Workers (Prescribed Persons)* must attend an accredited Child Safe Training Program² as soon as practicable after starting or else provide evidence of having attended an equivalent program previously. Each *Worker’s* training status is maintained in a *Register of Workers* described in Table 5.
 - All *Workers (Prescribed Persons)* must undergo a refresher Child Safe Training session at least every three years. Each *Worker’s* training status is maintained in a *Register of Workers* described in Table 5.
 - All *Workers (Prescribed Persons)* will be required to review this *Policy* and *Code of Conduct* each year. *Worker’s Code of Conduct* review date and status is maintained in a *Register of Workers* described in Table 5.
- Support:
 - All new *Workers (Prescribed Persons)* must attend a Child Safe Induction session as described in Section 2.5. *Worker’s* induction status is maintained in a *Register of Workers* described in Table 5.
 - A summary of our child-safe responsibilities as articulated in this *Policy* and our *Code of Conduct* will be placed on display within GHC premises.
 - This *Policy* will be made accessible via our on-line presence or in printed form to anyone requesting it.
 - A *Child Safety Officer* role will be established to promote awareness of child safety responsibilities and commitments, and attend to administrative responsibilities related to child safety.
 - As part of GHC’s teaching and proclamation of the Gospel we will not neglect to remind hearers about God’s special concern for the vulnerable and needy which includes, in particular, children and young people — and our responsibility to protect, encourage and support them.

² Training may be sourced through a government accredited *Through Their Eyes* trainer or *Child Protection Solutions Australia* customised training or similar qualified child safe training specialists.

2.7. Reporting and Responding to Harm or Risk of Harm

GHC is committed to ensure suspicion of harm or risk of harm to children or young people is properly reported and addressed.

Everyone has a responsibility to protect and support children and is encouraged to report the reasonable belief that a child or young person is or may be at risk of harm. However, those defined as *Mandated Notifiers* have a legal obligation to do so. In GHC the *Mandated Notifiers* include:

- GHC CEO (Senior Pastor) and other appointed Pastors.
- All GHC Board Members.
- All GHC employees.
- GHC Volunteers in Prescribed Positions.
- Any GHC member or attendee in an occupation specified in Section 30 of the *Children and Young People (Safety) Act 2017* which includes: medical practitioners, pharmacists, nurses, dentists, psychologists, police officers, community corrections officers, social workers, ministers of religion, teachers and others as defined in the Act.

GHC's policy on reporting and response obligations aligns with legislative requirements and is enacted with the primary concern and focus on the needs of the child as expressed by *Principle Six* of the *National Principles of Child Safe Organisations*: "Processes to respond to complaints and concerns are child focused."

These obligations include:

- Identification — recognising and identifying possible harm or risk of harm.
 - Reasonable grounds — if there are reasonable grounds to suspect harm or risk of harm, then this should be reported. Such grounds may be based upon observations about a child's behaviour or physical injuries, a child talking about harm experienced or harm caused to another child, a reliable witness, etc. The *Mandatory Notification Information Booklet* issued by the Department of Human Services provides easy-to-understand information about identifying children or young people at risk of harm.
 - Workers in children ministries need to be 'listeners' and sensitive to needs and concerns expressed by the children and particularly those that may be indicative of harm or risk of harm.
 - Children ministries should provide an environment where there is adequate opportunity for children to express needs and concerns.
 - Where annual performance reviews or other feedback reveal concerns about *Worker* behaviour or suitability then this must be documented as part of the review.
- Reporting
 - Anyone who forms the suspicion that a child may have been harmed or is at risk of harm should immediately contact the Child Abuse Report Line (CARL) on 13 14 78 or if at immediate risk, report to South Australia Police (SAPOL) on 000. For mandated notifiers these are legal obligations.
 - The report should be made directly by the person who identifies the harm or risk of harm.
 - The notifier should document the suspicion or incident including, where known, the time, location, any witnesses present, and other information that may be pertinent to the report as described in Table 4. If the notifier is a GHC Worker or if the alleged perpetrator is a GHC Member or Worker this report will be filed in GHC's Register of Notifications as described in Table 5.
 - Notify the GHC Child Safety Officer, GHC CEO or GHC Board — to ensure adequate safeguards are in place until official intervention occurs as necessary. This notification process should in no way hinder or dissuade the notifier from reporting to CARL.
 - No investigative activity should be pursued by the notifier or others in the case of a CARL report — this should be left to the relevant authorities.

- Responding
 - Any *Worker (Prescribed Person)* who is under investigation for suspected child abuse will be suspended from any *Prescribed Positions* until resolution of the investigation. If the person is cleared of any guilt, he or she can resume his or her role in a *Prescribed Position*. If the person is found guilty of an offence that person will be permanently terminated from any role in a *Prescribed Position*.
 - GHC pastoral and counselling staff are available to provide support to children, young people and their families after a report to CARL or SAPOL has been made or in relation to any such concerns. The GHC Counsellor is trained to discern where referral to professional support is warranted.
 - In non-criminal related matters where the GHC CEO or Board can offer direction and support, it may be appropriate to meet with and discuss a particular situation with an alleged perpetrator, family member, or anyone affected by allegations.
 - Where there is a serious breach of the Code of Conduct but one that does not warrant reporting to CARL, the matter will be investigated by the GHC CEO and Board and appropriate action taken — either to allow and enable the *Worker* to address and resolve any issues, or else to terminate the *Worker* from functioning in the *Prescribed Position*. Any decision made in this regard must be endorsed by the Board.
 - All GHC Members and Workers are expected to fully cooperate with authorities at all times.

2.8. Reporting and Responding to Complaints or Feedback

Some complaints, feedback and other sources of information do not amount to reasonable grounds for a CARL report but are nevertheless pertinent to maintaining a safe environment for children. In such cases, GHC is committed to deal with such input promptly, sensitively and fairly and especially maintaining as the primary focus the needs of children and young people as expressed by *Principle Six* of the *National Principles of Child Safe Organisations*: “Processes to respond to complaints and concerns are child focused.”

The procedure for managing complaints and feedback involves the following.

- Receiving Complaints or Feedback:
 - The primary contact for feedback, complaints or concerns that particularly relate to the safety and wellbeing of children or young people is the GHC Child Safety Officer.
 - Also, the GHC CEO, Board Members and Workers are required to be sensitive and approachable to receive input from those both internal and external to GHC — whether that input relates to general feedback, or particular complaints or concerns. Any matters of significance should be referred to the GHC Child Safety Officer.
 - Input can also be submitted during Church Services via *Next Step Cards*³ or by email — addresses are available on GHC’s public web site.
 - All input of significance is documented by the GHC Child Safety Officer in the *Register of Complaints and Feedback* as described in Table 4 and Table 5.
- Responding to Complaints or Feedback:
 - All input is assessed by the GHC Child Safety Officer to determine its severity. If it warrants reporting to CARL then the source will be encouraged to do so — if no action is taken the Child Safety Officer may submit such a report and follow the procedure as described in Section 2.7.
 - Serious breaches of the Code of Conduct that do not warrant reporting to CARL will be notified to the GHC CEO or Board and be investigated and appropriate action taken — either to allow and enable the *Worker* to address and resolve any issues, or else to terminate the *Worker* from functioning in the Prescribed Position. Any decision made in this regard must be endorsed by the Board.
 - Where complaint or feedback pertains to general policy or procedural matters related to child safety and wellbeing, the GHC Board together with the Child Safety Officer will determine whether revision of this Policy or other procedures are warranted. In that case, the Child Safety Officer will incorporate the necessary changes in accordance with the review process described in Section 4.
 - Complaints of a minor or general nature will be acknowledged but no action may be required.
 - All input that requires action will be allocated to an Owner who becomes responsible for resolution of the matter.
 - Once resolved, the source will be notified of the outcome.

³ Next Step Cards are available during services providing opportunity for any attendee to connect or provide input.

2.9. Risk Management

GHC is committed to Identifying and managing risks that may jeopardise the safety or wellbeing of children and young people as described under *Principle Six* of the *National Principles of Child Safe Organisations* which states that “reducing the risk of harm in physical and online environments is an important preventative mechanism.”

The following procedure defines GHC’s approach to management of such risks.

- Identify:
 - Any risks that may have significance to the safety and wellbeing of children and young people should be notified to the GHC Child Safety Officer.
 - Some of these risks may have their genesis during recruitment activity; supervision, training and support; reporting and responding to harm; reporting and responding to complaints and feedback.
 - Though all activities and circumstances may give rise to risks, there are certain situations in which children may be more vulnerable and so require particular vigilance and monitoring so that risks are indeed identified and mitigated. These include:
 - Church children’s programs and activities.
 - Church crèche services.
 - Where records containing information about children are being accessed or viewed.
 - Where photographs that may contain images of children are taken.
 - Presence of visitors unknown to the GHC CEO, GHC Board or GHC Workers.
- Register:
 - A *Risk Management Register*, described in Table 5, is maintained by the GHC Child Safety Officer.
 - The GHC Child Safety Officer will record risks and any associated details in the *Risk Management Register*.
 - The *Risk Management Register* is regularly reviewed during GHC Board Meetings to ensure that significant risks are being adequately addressed.
- Assess:
 - The GHC Child Safety Officer assesses the severity of the risk based upon its likelihood of occurring and its potential impact. The Officer may consult with other GHC Workers or the Board in making this assessment. This is recorded in the *Register*.
 - The GHC Child Safety Officer identifies mitigating actions (including target resolution dates) in consultation with relevant Workers and the Board, as appropriate.
- Allocate and Resolve:
 - The GHC Child Safety Officer will allocate the risk to an *Owner* who has the responsibility to ensure that the mitigating actions are addressed.
 - The *Owner* takes the identified mitigating actions.
- Review:
 - The *Risk Management Register* is regularly reviewed during GHC Board Meetings to ensure that significant risks are being adequately addressed.

3. Forms and Records⁴

3.1. Forms

The forms⁵ required for administering this policy are summarised as follows.

Form	Content Description
Application for Worker role	<ul style="list-style-type: none"> ▪ Position name. ▪ Applicant name, contact. ▪ References supporting <i>Worker's</i> suitability.
GHC Code of Conduct	<ul style="list-style-type: none"> ▪ See Appendix A for details.
Notification Report	<ul style="list-style-type: none"> ▪ Date of notification to CARL. ▪ Details of the Child: name, age, address, school, ethnicity and any other related information. ▪ Details of the notifier: name, position or job title, address, contact information, relationship to child. ▪ Details of the alleged perpetrator: name, age, address, relationship to child, current location. ▪ Details of the allegation: <ul style="list-style-type: none"> ▫ Time and location of the suspicion or incident. ▫ Witnesses or other parties present. ▫ Description of the suspicion or incident relating to the allegation including injury, harm or risk, current and previous. ▪ Other contextual details: <ul style="list-style-type: none"> ▫ Information about parents or guardians ▫ Cultural or background information that may be relevant to the report.
Complaint and Feedback Form	<ul style="list-style-type: none"> ▪ Person recording the input. ▪ Date input received. ▪ Source of input – may be anonymous or named. ▪ Description of input. ▪ Response action – may simply be an acknowledgment to source or specific action to be addressed. ▪ Response owner – the individual responsible to ensure the action is completed. ▪ Status – initial creation, allocated to Owner, resolved.

Table 4 — Forms

⁴ This section describes the *content* of the Form and Record — it does not imply anything about the mechanism to store that content which can include paper, electronic document, entry in a spreadsheet, etc.

⁵ A *Form* is essentially a template for information to capture.

3.2. Records

The following records⁶ must be maintained as part of administering this policy.

Record	Content Description
Register of Workers	<ul style="list-style-type: none"> ▪ Worker name. ▪ Contact information, ▪ Working with Children Check (WWCC) cited. ▪ Date of check. ▪ Induction date and status. ▪ Training date and status — includes induction and all required training. ▪ Filed Application Form. ▪ Signed and filed Code of Conduct. ▪ Code of Conduct review date and status.
Register of Notifications	Filed Notification Reports.
Register of Training	Record of training events, dates and attendees.
Register of Complaints and Feedback	Filed Complaint and Feedback Forms.
Risk Management Register	Record of risks, assessment and mitigations. <ul style="list-style-type: none"> ▪ Risk name and date. ▪ Risk description. ▪ Risk source. ▪ Risk status — initial, assessed, allocated (to owner), resolved (mitigations addressed). ▪ Risk severity — based upon likelihood and impact. ▪ Risk owner — responsible to ensure any mitigations are addressed. ▪ Risk mitigation — actions required to mitigate the risk.

Table 5 — Records

These records are confidential and must be secured and accessible only by the *GHC CEO, GHC Board, GHC Safety Officer* or authorised delegates.

4. Policy Review

This *Policy* is reviewed at two levels:

- A simple annual review will be initiated by the *Child Safety Officer* on behalf of the *GHC CEO*. This will focus on events or risks of significance to the scope of this *Policy* that may require content updates. Results of this annual review will be reported at the Annual General Meeting (AGM).
- A more substantial review will be initiated every five years by the *Child Safety Officer* and a report submitted to the *GHC Board*. This five-year review should assess the effectiveness of the *Policy* and take account of any identified risks in the *Risk Management Register*, any *Notification Reports*, and any legislative, regulatory or ministry changes. This report must be made available at the Annual General Meeting (AGM).

Any recommended revisions to this *Policy* must be approved by the *GHC Board*.

⁶ A *Record* can be populated from the content of a *Form* or directly.

Revision History

Version	Status	Date	Comments
0.1	Draft	23 October 2023	Initial draft version.
0.2 to 0.5	Draft	24 October 2023	Elaboration and refinements including feedback received.
0.6	Draft	24 October 2023	Document as reviewed by Board and Leaders.
0.7	Draft	24 October 2023	Revisions following internal review.
1.0	Active	25 October 2023	Further revisions and approval.

Appendix A — Grace Hills Church Code of Conduct

Any person working with children or engaged in child-related work as defined in the *Child Safety (Prohibited Persons) Act 2016* is responsible for promoting and protecting the safety and wellbeing of children and young people. Such persons are referred to here simply as *Workers*. As part of Grace Hills Church’s *Child Safe Environments Policy* it is a requirement that all *Workers* comply with the following.

Workers Must:

- Firstly read, and then comply with the *Child Safe Environments Policy* at all times and take all reasonable steps to ensure the safety and protection of children and young people.
- Communicate the love and grace of God that shows no partiality and embraces all children and young people regardless of abilities, appearance, gender, race, background, or any other differences.
- Treat everyone with respect and fairness regardless of abilities, appearance, gender, race, background or any other differences.
- Recognise the value and intrinsic worth of children and young people and act to create an environment where they are protected, encouraged, informed, and feel at liberty to participate and contribute to all matters affecting them.
- Behave in a manner that provides a positive role model to children and young people in all interaction with them.
- Set clear boundaries about appropriate behaviour between *Worker* and the children and young people.
- Listen and respond appropriately to the views and concerns of children and young people.
- Ensure another adult is present or in sight during one-to-one coaching, instruction, personal assistance, or other activity.
- Be alert to children and young people who are, or may be at risk of harm, and report any reasonable suspicion immediately to the Child Abuse Report Line (13 14 78).
- Respond quickly, fairly and transparently to any serious complaints made by a child, young person or parent or guardian.

Workers Must Not:

- Engage in activity that puts children at physical or emotional risk.
- Treat individual children or young people in a manner that could be seen as favouritism or cultivate a ‘special’ relationship with an individual child or young person by actions such as offering exclusive gifts.
- Do things of a personal nature that a child or young person can do for themselves, such as toileting or changing clothes.
- Discriminate against any child on the basis of appearance, gender, race, background or any other differences.

Breach of the Code of Conduct:

Breaches will be investigated by the Board and may result in suspension or termination depending upon the seriousness of the breach. Details are provided in the section on *Reporting and Responding to Harm or Risk of Harm* in the *Child Safe Environments Policy* document.

Agreement:

I understand and agree to abide by this Code of Conduct.

Name:

Signature:

Date: