



# Safe Church Policy

Code of Conduct and Child Protection Policy

Updated July 2022

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## HILLS BIBLE CHURCH CODE OF CONDUCT FOR CHILD SAFETY

*This Code of Conduct provides requirements for ministry leaders, life group leaders, employees and volunteers who may come into contact with children and vulnerable people.*

**In accordance with the Victorian Child Safe Standards, a child is defined as a person under 18 years of age.**

The following constitutes HBC's Code of Conduct for behaviour for a person in a position of trust within the church:

1. As a person in a position of trust within the church you must always be concerned about the integrity of your position, likely perceptions of the church and the wider community, and the need to acknowledge the real or perceived power given to you as a result of holding this position. You should avoid situations where you are vulnerable to temptation or where your conduct may be construed to be a breach of this Code of Conduct. You will make yourself familiar with the provisions of HBC's Safe Church Policies.

2. You must not fail to take action to prevent to the best of your ability and report as required any of the following:

- child abuse,
- a child or young person at risk of significant harm,
- reportable conduct,
- sexual misconduct, and/or
- conduct that breaches the HBC Code of Conduct for Child Safety.

3. Sexualised behaviour is any behaviour that may reasonably be perceived to be of a sexual nature according to the standards of the time by the person to whom it is directed. Sexualised behaviour is only permitted as set out in the Word of God.

4. You must not engage in or condone any behaviour that could be considered to be:

- child abuse,
- putting a child or young person at risk of significant harm,
- reportable conduct, and/or
- conduct that breaches this HBC Code of Conduct for Child Safety.

5. You must not engage in or condone any behaviour that could be considered to be sexual misconduct, understanding that sexual misconduct is contact or invitation, via any means, of a sexual nature which is inconsistent with the integrity of a person in a position of trust within the church. Sexual misconduct includes any behaviour that could be reasonably considered to be sexual assault, sexual exploitation, sexual harassment, coercion or grooming of an adult or a child or young person.

6. Sexual exploitation refers to any form of sexualised behaviour with an adult, child, or young person, whether or not there is consent and regardless of who initiated the behaviour, where that behaviour is contrary to the Word of God. Therefore, you will not among other things engage in or condone any of the following:

- behaviour or a pattern of behaviour aimed at the involvement of others in sexual acts, including, but not limited to, coercion or grooming behaviour,
- sexualised behaviour with a person below the age of consent,

- sexualised behaviour with a person with whom there is a supervisory, pastoral care, or counselling relationship,
- the production, distribution, possession of or accessing of pornographic material of any kind,
- taking advantage of the conscious or unconscious use of sexually provocative behaviour that some victims of abuse display,
- participating in sexually explicit conversation via social media, chat rooms, gaming, or any other means, and

7. Sexual harassment means unwelcome sexualised behaviour, whether intended or not, in relation to an adult, child or young person where that person reasonably feels in all circumstances offended, belittled or threatened. Such behaviour may consist of a single incident or several incidents over a period of time.

Therefore, you will not, among other things, engage in or condone:

- implicit or explicit demands or suggestions for sexual activities,
- making any gesture, action, or comment of a sexual nature to a person or about a person in their presence,
- making jokes containing sexual references or innuendo using any form of communication,
- exposure to any form of sexually explicit or suggestive material, including but not limited to pornography of any kind,
- physical contact that is inappropriate to the situation or uncomfortable or confusing for the receiver, including kissing, hugging, touching, pinching, patting or aggressive physical conduct,
- touching any sexual part of the body, including the “only kidding” or accidental occasions of sexual touch,
- generating or participating in inappropriate personal correspondence (including electronic communication) in respect of sexual or romantic feelings or in breach of the Code of Conduct,
- inappropriate giving of gifts, including those of a sexual, suggestive, or romantic nature that is in breach of the Code of Conduct,
- inappropriate or unnecessary discussion of, or inquiry about, personal matters of a sexual nature,
- inappropriate intrusion of personal space or physical privacy, including being alone in a bedroom or bathroom or allowing inappropriate exposure during activities that require dressing or changing clothes,
- voyeurism, and
- persistent following or stalking.

8. Coercion or grooming behaviour refers to physical or psychological actions intrinsic to initiating or hiding abusive behaviour, which involve the manipulative cultivation of relationships with vulnerable adults, children and/or young people, their carers, and others in authority. You will not exhibit any behaviour that could be considered to be coercion or grooming behaviour.

9. With regard to church events and in relation to children and young people:

- You will not conduct a camp or other activity involving overnight accommodation without appropriate “camp parents” (ideally a married couple over the age of 25 years, of known maturity and Christian commitment) approved by the elders.
- You will not provide any form of accommodation for any reason where there is not strict segregation by sex, with the exception of married couples and families. Supervision of children and/or young people must be provided by a person of the same sex.
- You will ensure that any activity involving children and/or young people is open to observation by parents and other adults with a legitimate interest.

10. With regard to adults, children and young people:

- You will not condone or participate in bullying behaviour, where bullying is the repeated seeking out or targeting of an adult, child, or young person to cause them distress and humiliation or to exploit them, including exclusion from a peer group, intimidation and extortion.
- You will not participate in or allow nude swimming or other such activities.
- You will not participate in or allow initiations and secret ceremonies.

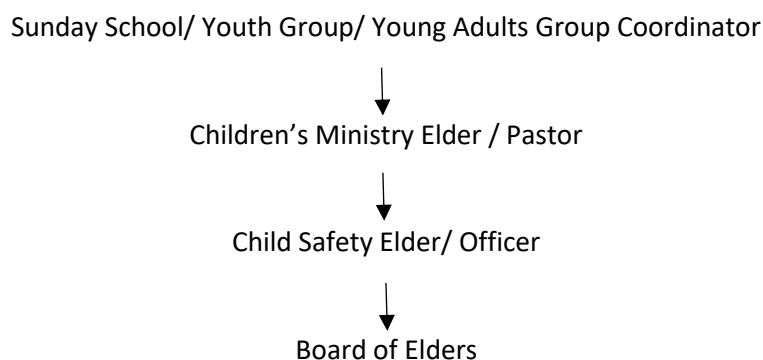
11. The Eldership may make temporary variations in respect to the details of the following. These temporary variations will be formally recorded by the Eldership and will be made on a restricted basis for individuals in specific circumstances for a specific period of time. Where no temporary variation is formally recorded, the following will apply without change:

- You will take care to ensure an appropriate balance of transparency and confidentiality so that the private concerns of others are not disclosed or revealed improperly. In ordinary circumstances, when you are providing pastoral care to, or working with, members of the opposite sex, you will strive to do so in an environment that allows visual surveillance and, where reasonable, have other people within hearing distance.
- You will not allow a child to sleep in close proximity to an adult, other than a parent or guardian, unless there is a significant separation, and privacy of all parties is respected.
- You will not allow an adult to share accommodation with one child or young person only unless they are a parent or guardian of that child or young person.
- You will not drive a child or young person unaccompanied even with parental permission, except where the child or young person is a family member. If such a situation is unavoidable, another adult is to be informed of the trip and the reason for it.

With respect to private arrangements within the church you must always be concerned about the integrity of your conduct, likely perceptions of the church and the wider community. You should avoid situations where you are vulnerable to temptation and your conduct may be construed to be a breach of this Code of Conduct. You must ensure you are operating with parental permission. You must not intentionally undermine the parent/child relationship. You must conduct yourself with transparency and preparation.

Where specified provisions cannot be followed in an emergency, the circumstances of the emergency and the actions taken should be reported to and approved by the elders. Where the actions taken are not approved or where no contact is made, that will be considered to be a breach of the Code of Conduct.

Any breaches of this Code of Conduct for any reason will be reported to the appropriate person as soon as possible. The chain of reporting is as follows:



**Anyone can make a comment or raise a concern at any time.  
Child safety is everyone's responsibility.**

## Child Protection

*Our first concern is that children be safe while they are in our care.*

**Before someone can begin as a volunteer at Hills Bible Church they must undergo the Volunteer Approval Process (prior to commencing in such a role).** This also applies to people raised in the Church as children who then commence working with children as adults. This is a legal requirement under the Victorian Child Safe Standards.

**All volunteers who are either in a role which carries an implied trust, and/or have direct contact with minors** will be required to undertake the following steps in the Volunteer Approval Process prior to commencing their service as a volunteer within Hills Bible Church. All staff – regardless of whether or not they have direct contact with children – are to complete step 2 prior to employment, with step 3 being completed as outlined below:

1. Complete a [Volunteer Expression of Interest](#) Form. If membership is required for the role, they will be directed to attend a Membership Class and to apply for membership through the following [Membership Form](#).
2. Complete a [Volunteer Questionnaire](#) which asks the volunteer to agree to adhere to Hills Bible Church's Statement of Beliefs, Code of Conduct and Background Checks. HBC may run reference checks, interviews and/or auditions at this point.
3. WWCC (including listing HBC as their employed or volunteered organisation) and/or National Police Checks.
4. Receive Position Descriptions and any Guidelines relevant to their role from their Ministry Coordinators.
5. Attend the next regularly scheduled Child Safety Training as organised by Hills Bible Church.
6. Training relevant to their role will be provided.

All suitable adults are required to adhere to the following standards at all times:

- Adhere to the Code of Conduct as outlined above.
- Follow the strategies below for responding to and reporting suspected child abuse.
- Ensure that there are at least two suitable volunteers (at least 1 adult) per room/area, and they are within view of the rest of the group, at all times, and no volunteer is ever alone with a child (unless it is their own, or they are the registered carer of that child).
- Employ scheduling procedures and volunteer/child ratios that optimise safety.

Please note: Hills Bible Church reserves the right to reject any applicant for volunteer service or dismiss an existing volunteer for any reason, including, but not limited to, refusing or failing to complete screening; failing to provide requested information; providing information that is subsequently determined as false or misleading; sin or suffering issues that compromise the applicant's or volunteer's ability to care for children; any criminal report or charge; obtaining information from references or Department of Justice record checks that suggest the applicant is not suitable to help children, and/or breaches to the Code of Conduct. In addition, any volunteer, leader, staff or elder (or any Hills Bible Church member) who learns of or has knowledge of misconduct by an applicant must report that knowledge following the reporting guidelines as outlined at the end of the Code of Conduct.

## Parameters for the Child Safety Policy

For the purposes of this Child Safety Policy, children and youth who have been voluntarily placed by their parents or registered carers under the responsibility of Hills Bible Church for the church's public worship services or specific children's ministry-related church events will be under the protection of this policy.

### Definitions, Roles & Responsibilities

**Staff:** Staff are paid employees of Hills Bible Church.

**Volunteer:** A volunteer is an adult who serves within the church and is not in paid employment.

**Children's Ministry Coordinator:** The Children's Ministry Coordinator is a suitable adult responsible for the organisation and oversight of the Sunday School program and roster, including purchasing the curriculum and ensuring all materials and supplies are available for each session. They will liaise with the administration to ensure all volunteers meet Child Safety standards as outlined below. They will operate under the support and oversight of the Children's Ministry Elder.

**Sunday School Teachers:** A Sunday School Teacher is a suitable adult who assists the Leader in running the Sunday morning session. They are responsible for teaching the lesson to the age group they are allocated and reporting back to the Children's Ministry Coordinator with any concerns or comments on the session.

**Sunday School Helper:** A Sunday School Helper is one who assists the Sunday School Teacher in teaching the lesson to the group they are allocated.

**Sign-In Coordinator:** The Sign-In Coordinator is a suitable adult who oversees the set-up of sign-in and sign-out including tally of children. They will also welcome new families and guide them through the completion of the Kid's Ministry Registration Form and the sign-in/out process. They will liaise with the Children's Ministry Coordinator in updating the attendance register on Elvanto.

**Suitable Adult:** a suitable adult is an adult who holds a current Working With Children Check (WWCC), and has completed the Child Safety training, and been approved by the Elders to participate in children's ministry. A suitable adult is in a position of trust and must complete the aforementioned requirements before commencing volunteer work in the Children's Ministry.

**Service Register:** Church folder to record info and issues each week.

**Youth Group Coordinator:** The Youth Group Coordinator is a suitable adult responsible for the organisation and oversight of the Youth Group program and roster including planning activities and the schedule for each session. They will oversee the budget for the Youth Group, ensuring all materials and supplies are available for each session. They will liaise with the Child Safety Officers and Administrator to ensure all volunteers meet Child Safety standards as outlined below. They will operate under the support and oversight of the elders. In the absence of the Youth Group Coordinator, this role may be filled by a Youth Leader. The Youth Leader will assume the same responsibilities as the Youth Group Coordinator, including in the chain of reporting outlined in the Code of Conduct.

**Youth Leader:** The Youth Leader is a suitable adult responsible for the implementation of the Youth Group session they are rostered for in liaison with the Youth Group Coordinator, including ensuring each Youth Leader has been allocated a role for the session and all necessary materials and supplies have been organised.

**Safe Church Team:** The Safe Church Team is responsible for ensuring HBC meets obligations according to the Child Safe Standards and the Reportable Conduct Scheme. They will conduct necessary training for HBC volunteers and be a point of contact and support for concerns regarding child safety at HBC. They will operate under the support and oversight of the elders.

**Unauthorised Persons:** An unauthorised person is someone who is not a parent or carer and/or who has not been through the Child Safety approval process to become a Suitable Adult as defined above. Should an unauthorised person enter the room or children's area, the Team Member should ask them to leave. Otherwise, or if the unauthorised person refuses, the following steps should be taken:

- Send a message to someone who will arrange for a suitable person to attend the area, preferably the Children's Ministry Coordinator or Youth Group Coordinator and/or an Elder
- The Children's Ministry Coordinator or Youth Group Coordinator and/or the Elder must then decide from the following:
  - Suspend the children's program and escort the group to another room.
  - The police should be called if the unauthorised person remains uncooperative.

## Online and smart phone usage guidelines

### For people in ministry roles:

The following guidelines are to assist all people who work with young people and all people who are in positions of authority and trust within HBC. This advice provides useful general guidance in regard to online and smart phone communication (i.e. all electronic communication).

### Basic Principles:

There are three basic principles when having any type of conversation with a young person:

- 1) Remember God is listening:
  - The 'God test' – is this conversation honouring God?
  - The 'parent test' – if this young person's parents were listening/reading this, would they feel comfortable with this conversation?
- 2) Seek transparency in conversations with young people and do not converse where you cannot be observed by others.
- 3) Do not get in deeper than you can handle – if issues arise that are greater than your ability or in an area of your weakness refer the young person to others who are better equipped to deal with it. When in doubt, ask for help.

The same code of conduct for leaders interacting with young people face to face applies to all types of online and smart phone communication.

### Specific conduct guidelines:



### **Facebook/Twitter/Instagram/blogs/websites**

If your church ministry or organisation establishes any of the above social media platforms as a method of communication within the group this is the best place for leaders to converse with members of the group as all conversations may be held in public. Ensure there is no option for private conversations to take place on this facility.

Best practice is for leaders not to be individual friends on social media with young people within the church. This is due to the risks inherent in private relationships which may develop over social media. These risks affect both young people and leaders. However, it is recognised that leaders may be individual friends on social media with young people where the relationship is pre-existing or established via other connections, for example they may be related or may have formed the friendship via knowing each other external to the leader/group member relationship. In circumstances where leaders are individual friends with young people on social media, leaders are at all times to adhere to the basic principles above.

### **SMS Text messaging/emails**

Best practice is to only use the above methods of communication as a “**one-way**” avenue for communicating within the group. Make it clear to all members of the group that while SMS texts/emails will be used for communication, leaders may not reply individually to any response from group members, unless a matter of urgency arises and in every case, with a fellow leader copied in on the reply. Give parents the option of always being copied in on any communication from the ministry or organisation leaders and add those parents to the contacts list.

When sending group emails always remember to send any email to yourself first and put all contacts into the **blind copy (BCC)** field to ensure you do not distribute email addresses without permission. Always **copy in fellow leaders**. Follow the same privacy protocols if using SMS texts to do mass communication within the group.

### **Zoom or other group meeting software**

If Zoom or other group meeting software is to be used for online ministry to people under 18 years of age, the Eldership must authorise the commencement of this ministry and instruct that the safety of children and young people is prioritised in the implementation of the ministry.

There must always be **two adult leaders present** in every online ministry event with children and/or young people. This is as much to protect our leaders as to protect our children.

Every meeting with children and/or young people must have a **password** to prevent non-authorized, uninvited participants joining the meeting. Use a meeting password to ensure the meeting is secure.

Enable the “**waiting room**” facility so that the meeting host can check the identity of each person wishing to enter the meeting and be confident that only invited attendees are admitted to the meeting. If using break-out rooms for smaller groups with children and young people, there must be two adult leaders in each break-out room.

Whichever platform is used in ministry to children and young people, there must be a **disabling of the direct messaging/chat facility** so that all interactions are transparent to all users. The platform must not be a “public” event on the internet and instead must be **by invite only**, sent by the meeting host/administrator/leader, directly to the child’s parent’s email, so that parents can choose whether or not their child participates in this ministry.

It is essential that parents of children participating in the online ministry are provided with information about:

- the platform being used for the ministry
- who will be leading the ministry
- who will be monitoring the ministry (this must be two leaders as a minimum)
- who parents can contact if they have any questions or concerns (for example, how to contact the Eldership and/or Safe Church Team if parents wish to raise a concern)

- these Safe Church Online and Smart Phone Usage Guidelines

Furthermore, reassure parents that:

- the ministry will be conducted in accordance with the Safe Church Policy, Code of Conduct and in compliance with the Victorian Child Safe Standards.
- the ministry has a strict “no cyber bullying” rule and any child found to be engaging in inappropriate or bullying conduct within the ministry will be removed from access to the ministry.
- it is recommended that the child access the ministry in an open part of their home for maximum safety.

Ministry leaders must read and implement the Safe Church Online and Smart Phone Usage Guidelines.

Ministry leaders must ensure that a clear “**no cyber bullying**” message is conveyed to the children participating and inform them that as the ministry has a strict “no cyber bullying” rule, any child found to be engaging in inappropriate or bullying conduct within the ministry will be removed from access to the ministry and their parents informed.

The Ministry Leader may decide to record online ministry. Any recordings made during the ministry must never be posted to the internet. Recordings must be stored securely, in case any concerns are raised at a later date. If recordings are to be made then the documented permission of parents of children under 18 years of age and any adult participants must be obtained. Permission provided by an email (which is also stored in case it is needed at a later date) to the ministry leader is sufficient.

#### **Phone/Skype/FaceTime/Messaging Apps/In-game messaging**

Aim to have 100% of communication to young people via **group communication**. Should a need arise to use phone/Skype/FaceTime/WhatsApp/Signal you should be accountable – always get parental permission **before** you talk with a young person over the phone.

Ensure both you and the young person are using this form of communication in an open area where people can see you or there are others present, e.g., not alone in your room.

**Do not** use messaging apps or in-game messaging to **communicate individually with children** or people under your pastoral care in your Church role. However, **parents can, in writing, allow their Youth Leaders to contact their children (of the same gender) for the discipleship purposes of the child.**

**In the case where an inappropriate message or image is sent to a leader by a child or a person under pastoral care/leadership via any online or smart phone communication, whether publicly or privately, the leader should not reply under any circumstances. Do not delete the image or message. The leader must immediately notify the ministry or organisation leader that this has occurred. The ministry or organisation leader may then contact the Safe Church Team for advice on how to proceed.**

#### **Cyber bullying and image-based abuse**

Sadly, there is an increase in the prevalence of cyber bullying and image-based abuse targeting both adults and children in Australia, mostly via social media.

Both State and Federal parliaments have begun to address this societal problem through legislation and the provision of assistance to Australians via the Office of e-safety – [www.esafety.gov.au](http://www.esafety.gov.au). If you become aware of cyber bullying or image-based abuse within the church context visit [www.esafety.gov.au](http://www.esafety.gov.au) and contact the Safe Church Team for assistance and reporting.

## What is Child Abuse

Definition: Child abuse is an act by a person or persons that endangers a child or young person's physical or emotional health or development. In Victorian legislation a child or young person is a person under 18 years of age.

There are different kinds of child abuse:

**Neglect:** Neglect is the failure to provide the basic necessities of life, such as love and affection, safety, food, clothing, hygiene, medical care and education.

**Emotional Abuse:** Depriving a child or young person of love and attention which can include, but is not limited to, constant criticism, isolation, excessive teasing, or terrorising. These actions and others are used by a person in a position of power to make the child feel worthless. It may also include actions that cause serious mental anguish without any legitimate disciplinary purpose as judged by the standards of the time when the incidents occurred.

**Physical Abuse:** All non-accidental physical injuries. This can include, but is not limited to, hitting, beating, burning, scalding, or shaking, and actions that cause serious pain without any legitimate disciplinary purpose as judged by the standards of the time when the incidents occurred.

**Sexual Abuse:** Sexual abuse includes involvement in sexual activities with anyone who is older, bigger, in authority or perceived authority or more powerful where a child or young person is unable to give informed consent. It also includes sexual activities with a person under 18 years of age (such as another child or sibling) where a child or young person is unable to give informed consent. Either party may initiate these activities. This includes, but is not limited to: touching in a sexual way, masturbating, flashing, oral sex, sexual intercourse, eroding the sexual boundary between two people through sexual innuendo, kissing, unwanted or unnecessary touching and overly long hugs. It can involve apparently consensual intercourse or sexual activity, but the validity of consent is negated by the power differential or the fact that one person has a moral and spiritual responsibility towards the other.

It also includes permitting another person to undertake these activities with your knowledge or in your presence.

**It is not possible for a person under the age set by legislation to legally consent to sexual activity.**

**Domestic Violence & Family Violence:** Any of the above four forms of abuse within the context of a family are considered to be a form of domestic violence. It also includes social isolation and/or financial control or deprivation. Domestic violence can be carried out upon a child or young person, or they can be a witness to violence. That is, to fall within this provision, the violence does not have to be directed at the child or young person.

## Signs of Abuse

The following chart gives examples of possible indicators of child abuse. This is not an exhaustive list and the presence or absence of any indicators listed does not necessarily mean the child is or is not experiencing abuse.

<b>Form of Abuse</b>	<b>Possible Indicators</b>
Sexual abuse	Verbally reports or discloses sexual abuse, aggressive, overt sexual behaviour, age-inappropriate knowledge of sexual acts, wary of physical contact (especially with an adult), physical signs of injuries (generally to the genital area), poor self-esteem, poor peer relations, inappropriate expressions of friendship between a child and an adult, self-harm.
Physical Abuse	Verbally reports or discloses physical abuse, unexplained welts, bruises, burns, fractures, lacerations, abrasions, head injuries, appears frightened of carer, seeks affection from any adult with no discrimination, extreme aggression or withdrawal or other behavioural extremes, complaints of soreness or injuries.
Emotional Abuse	Verbally reports or discloses emotional maltreatment, speech disorders, lags in physical development or failure to thrive, attempted suicide, low self-esteem, toileting problems, apathetic, withdrawn, habit disorders (such as rocking, biting, sucking).
Neglect	Verbally reports there is no carer/parent at home or a consistent lack of supervision, consistent hunger, poor hygiene, inappropriate dress, chronically unclean, unattended physical problems, medical or dental needs, underweight, developmental delays, begs or steals food.

- Child abuse is not usually a single incident but rather takes place over time.
- Individuals and organisations in HBC must be aware of and look out for all forms and indicators of child abuse.
- Online sexually exploitative abuse of children is growing exponentially in Australia due to the popularity of online activity and, in particular, social media use by children. Always report online sexually exploitative abuse of children to police and Safe Church Team.

## Inappropriate & Appropriate Touching

### Inappropriate Touching

- Shoving, hair pulling, shaking, slapping, pinching, biting, kicking, hitting, or spanking a child for any reason.
- Squeezing of arm, neck, face, or any parts of the body.
- Tickling children over 5 years old. It is over stimulating and is considered by some professionals to be a deceptive device that could lead to inappropriate touching.
- Holding or restraining children on the lap. However, holding a child 5 years and younger is appropriate for short time spans when comfort is needed by the child or the child's behaviour is out-of-control or endangering other children.
- Touching a child in the genital areas.
- Kissing a child on the lips, neck, or anywhere else. A child should never be allowed to kiss a staff member, volunteer, leader or another child on the lips, neck, or anywhere else. Children are also not allowed to kiss one another. (Note: A kiss is appropriate on the cheek when it is included in a greeting)
- Slapping a child on the behind, even when playing.
- Fondling children, even in non-private areas.
- Carrying a child on the back unless the child is unable to walk.

### Appropriate Touching

- A comforting pat on the shoulder and back or allowing an emotionally distressed child to lean their head on your shoulder is appropriate.

- Back rub to help comfort or put an irritable child to sleep is appropriate.
- High-Fives, handshakes, or the touching of two fists are appropriate and recommended touch, especially when interacting with older children.
- Holding hands is permitted with children 10 years and under when initiated by the child, or when helping a child to walk, climb stairs, etc.
- Holding a child firmly with your hands to restrain him/her is appropriate when it is used to prevent a child from an accident, injury, hurting self, others, or you.
- Assisting a child to get up if they have fallen or helping them if they have injured themselves is considered appropriate - for example applying an adhesive dressing to a grazed knee.

## What to do if a Child or Youth Member Discloses Abuse

1. Listen, listen, listen... and do not add anything.
2. When listening to a child or young person remember:
  - that young people often talk about difficult or painful things in a roundabout way
  - they need assurance from adults that it is OK to talk about upsetting things
  - they often feel ashamed and frightened and find it hard to find the right words to explain
  - being observant will help you pick up non-verbal clues about what is wrong; they may drop hints when something is wrong, for example, "I don't like so and so. Do you like him/her?"
3. Tell the child or young person, "You are not to blame".
4. Do not press for information or push the child or young person to reveal the details of the abuse. Do not ask leading questions, rather listen carefully and if possible, take notes.
5. Reassure them, "You are right to tell, and I take what you say very seriously."
6. Tell the child or young person that you and the church are there to help and you will be telling the Church Safe Team and/or Elders what has been said so that they may receive help.
7. Sometimes a child or young person discloses abuse to a person who the child feels safe with or trusts. In this situation carefully listen and reassure the child that you will help them. Do not promise to tell anyone else. Rather, say "There are people who can help you and I will tell them."
8. Finish on a positive note and tell the child "I am pleased you told me this. You are not alone."

**If you consider that the child is in immediate danger, call the Victorian Police 000 (112 from a mobile phone).** Stay with the child and call the Safe Church Team who will assist you with the process after that. After the danger has passed, make notes including the date, time, what was disclosed to you and any other circumstances surrounding the event.

If there is no immediate danger then as soon as possible after the disclosure make notes of exactly what the child or young person disclosed and the date and time of the meeting and make a report to the Safe Church Team who will assist you with the process after that.

If allegations of abuse are made against an employee or volunteer of Hills Bible Church, Victoria Police, the Elders, and relevant insurance agent will be notified. An independent person will be appointed to investigate allegations along with appropriate government agencies (i.e., Victoria Police). The person under investigation will be immediately suspended from duties. If an employee is found to be guilty of the allegations in a court of law, their employment at Hills Bible Church will be terminated.

At any time, a person may make a direct external report to the police or appropriate government agency and then notify the Church Safe Team that a report has been made.

## When to make a report

A report to the Safe Church Team, Victoria Police or to Department of Families, Fairness and Housing (DFFH) Child Protection is to be made when an individual or organisation within HBC **forms a belief on reasonable grounds that a child is in need of protection from abuse**. A separate report must be made to the Commission for Children and Young People in matters that fall under the Reportable Conduct Scheme. Contact the Safe Church Team for assistance.

Here, the following guidelines from the DFFH Child Protection Practice manual apply:

### **“Forming a Belief”**

To form a belief, the reporter must be aware of matters and hold any opinions in relation to those matters that lead them to reasonably believe a child is in need of protection (s.186 Children, Youth and Families Act Victoria).

### **Reasonable Grounds**

A belief on reasonable grounds is formed if a reasonable person in the same position would have formed the belief on the same grounds (s.184 (4) Children, Youth and Families Act Victoria).

For example, there may be reasonable grounds when:

- A child states that they have been physically or sexually abused
- A child states that they may know someone who has been physically or sexually abused (sometimes the child may be talking about themselves)
- Someone who knows the child states that the child has been physically or sexually abused
- Signs of physical or sexual abuse lead to a belief that the child has been abused

Other kinds of child abuse are also reportable – for example, neglect.

### **Suspicious of Harm**

Further to the above, suspicions of harm of children must be reported. Reporting is necessarily and intentionally victim-focused. Where a child’s welfare is at stake, it is always better to act and report than to fail to do so.

A suspicion of harm exists when someone has a reasonable suspicion that a child has suffered, is suffering, or is at an unacceptable risk of suffering significant harm. The DFFH descriptions in the bullet points above also apply to determining whether there is a suspicion of harm. Any person who witnesses abuse of a child by an adult must also report this.

### **The ‘Betrayal of Trust’ Laws**

Three pieces of legislation relating to child protection issues have been added to the Victorian Crimes Act (1958) (the following information is extracted from the Department of Justice and Community Safety fact sheets for each offence):

#### **Failure to Protect:**

The offence will apply where there is a substantial risk that a child under the age of 16 under the care, supervision or authority of a relevant organisation will become a victim of a sexual offence committed by an adult associated with that organisation. A person in a position of authority in the organisation will commit the offence if they know of the risk of abuse and have the power or responsibility to reduce or remove the risk, but negligently fail to do so.

A relevant child is a child who is, or may come, under the care, supervision, or authority of a relevant organisation. The child does not need to be identified. This means that the risk is not that a particular child will become the victim of sexual abuse. Instead, the substantial risk could be posed

to any child who is, or who may be in the future, under the organisation's care, supervision, or authority.

The maximum penalty for failing to protect a child is five years' imprisonment for each individual who failed to protect children in the organisation from a known substantial risk to their safety from sexual abuse in the organisation.

#### **Failure to Disclose:**

Any adult who forms a reasonable belief that a sexual offence has been committed by an adult against a child under 16 has an obligation to report that information to Victoria Police or DFFH - Child Protection. Failure to disclose the information to the relevant authorities is a criminal offence.

The maximum penalty for failing to disclose child sexual abuse is three years' imprisonment.

This law has in effect made every person aged over 18 years in Victoria a mandatory reporter of child sexual abuse.

#### **The 'Grooming' offence**

The offence of grooming concerns predatory conduct undertaken to prepare a child for sexual activity at a later time. The offence can be committed by a person aged 18 years or over.

The maximum penalty for grooming is ten years' imprisonment.

#### **The Victorian Reportable Conduct Scheme**

There are five types of 'reportable conduct':

- sexual offences committed against, with or in the presence of a child
- sexual misconduct committed against, with or in the presence of a child
- physical violence against, with or in the presence of a child
- any behaviour that causes significant emotional or psychological harm to a child
- significant neglect of a child.

Please contact the Safe Church Team with any RCS concerns or allegations. Alternatively, anyone may report directly to the Commission for Children and Young People - phone: (03) 8601 5281 – and then advise the Safe Church Team of the report.

## **Emergency Procedures (Fire, Bomb Threat, etc.)**

Leaders are required to familiarise themselves with the instruction, escape routes and safe zone (assembly point) of the premises. Please see attached for the Emergency Exit Map for Melbourne School of Theology (see Appendix 4).

It is the Group Leader's responsibility to be aware of the number of children under supervision at all times.

In the case of an emergency, such as fire, or bomb threat, or if an emergency alarm is sounded, the following should occur:

- Remain calm
- All children are to be evacuated to the designated assembly point
- Ensure all children are accounted for
- Remain with the children until they are signed over into the care of their parent or carer



Note: Children’s safety is the highest priority at all times and therefore should be prioritised higher than fighting the fire, etc.

## Reporting an Incident

If any incident occurs in breach of the Code of Conduct, this policy or if the welfare of a child/ren is suspected to be at risk (for example, if a child discloses abuse or there are signs of abuse), the [Incident Form](#) / Register should be completed (see Appendix 3) .

The report can be completed by anyone who witnesses an incident or has concerns, not only those who are directly involved in the child/youth ministry programs.

The form should be completed as soon as practicable after the incident, including the immediate response recorded.

The completed report needs to be given to the Children’s Ministry Coordinator / Youth Group Coordinator, who are then responsible for liaising with the Church Safe Team to plan and take any preventative or follow-up actions. After reviewing and signing off, the Incident Form is then sent for review and agreement by the church Elders.

*Refer to appendix 3 for incident reporting forms*

### Contact Details for child related issues

#### Reporting

If a child is in immediate danger call Victoria Police 000

Then call the Safe Church team

In the case of allegations or suspected abuse there are two options:

- Call the Safe Church Team. The Safe Church Team can then make the necessary contact with the Department of Families, Fairness and Housing– Child Protection or Victoria Police.

OR

- Call the Department of Families, Fairness and Housing – Child Protection. Local Child Protection numbers are listed below if calling within business hours OR if after hours call Child Protection Emergency Services 131 278. Then call the Safe Church Team to notify that Child Protection have been contacted.

#### Department of Families, Fairness and Housing– Child Protection Contact Details for Reporting

Regions of Victoria	Telephone
Intake Unit	
Eastern	1300 360 391
North and West	1300 664 977
Southern	1300 655 795
Western Rural & Regional Only	1800 075 599
After Hours Child Protection Emergency Services	131 278

See <https://services.dffh.vic.gov.au/child-protection-contacts>



### **Victorian Reportable Conduct Scheme reports**

Directly to Safe Church Team

OR Directly to the Commission for Children and Young People – [www.cyp.vic.gov.au](http://www.cyp.vic.gov.au)

### **Support and Referrals**

After Hours Child Protection Emergency Services: 131 278

Kids Helpline: 1800 55 1800

## Appendix

### 1. Mandatory Reporting to Child Protection

*People in religious ministry fact sheet, Victorian State Government, Department of Families, Fairness & Housing, Version 12 February 2020*



#### What is mandatory reporting?

Mandatory reporting refers to the legal requirement of certain groups of people to report a reasonable belief of child physical or sexual abuse to child protection authorities.

#### Who is mandated to report in Victoria?

The following are mandatory reporters in Victoria:

- registered medical practitioners
- nurses
- midwives
- registered teachers and early childhood teachers
- school principals
- school counsellors
- police officers
- out of home care workers (excluding voluntary foster and kinship carers)
- early childhood workers
- youth justice workers
- registered psychologists
- people in religious ministry.

#### How are people in religious ministry be defined?

The term 'person in religious ministry' means a person appointed, ordained or otherwise recognised as a religious or spiritual leader in a religious institution.

For example:

*Church elder, deacon, granthi, imam, religious minister, monk, nun, pastor, priest, pujari, rabbi, religious brother or sister and Salvation Army officer*

A religious institution means an entity that operates under the auspices of any faith; and provides activities,

facilities, programs or services of any kind through which adults interact with children.

Examples may include dioceses, mosques, parishes, synagogues, local religious congregations, schools, post-secondary institutions and religious institutes that may provide activities, facilities, programs or services such as chaplaincy services, early childhood services, outreach support or care services or residential facilities.

#### Do I need to report information received during religious confession?

Yes, if you have formed a reasonable belief a child has suffered or is likely to suffer significant harm as a result of physical injury or sexual abuse.

All mandatory reporters in Victoria are required to report when a belief is formed in the course of practising their profession or carrying out the duties of their office, position or employment. There is no exemption for doctors or other professionals on the basis of their usual legal or ethical confidentiality obligations. Likewise, there is no exemption for religious confessions.

#### What am I required to do?

In Victoria, under the *Children, Youth and Families Act 2005*, mandatory reporters must make a report to child protection, if:

- in the course of practising their profession or carrying out duties of their office, position or employment
- they form a belief on reasonable grounds that a child is in need of protection from physical injury or sexual abuse.

#### When do I have to report?

Make a report to Child Protection as soon as practicable after forming your belief. Make a report each time you become aware of any further reasonable grounds for your belief.

The penalty for failing to make mandatory report is 10 penalty points<sup>1</sup>.

If you are worried about a child's wellbeing but do not believe they are in need of protection, refer to the below section on how to make a referral to Child FIRST or The Orange Door.

### What is a belief on reasonable grounds?

A belief is a belief on reasonable grounds if a reasonable person, doing the same work, would have formed the same belief on those grounds.

Grounds for forming a belief are matters of which you have become aware, and any opinions in relation to those matters.

### When is a child in need of protection?

A child may be in need of protection if they have experienced or are at risk of significant harm, and their parents have not protected, or are unlikely to protect them from that harm. Significant harm may relate to:

- physical injury
- sexual abuse
- emotional or intellectual development
- physical development or health
- abandonment or parental incapacity.

Mandatory reporters are required to report in relation to significant harm as a result of physical injury or sexual abuse. They may choose, as can anyone, to report in relation to other types of significant harm.

### What will Child Protection do?

The best interests of the child are the paramount consideration. Child Protection will decide when follow up is required and how to classify the report. This may mean providing advice to the reporter, progressing the matter to an investigation, referring the family to support services in the community, or taking no further action.

### Contact Child Protection

To make a report, you should contact the child protection intake service covering the local government area (LGA) where the child normally resides. Telephone numbers to make a report during business hours (8.45am-5.00pm), Monday to Friday, are listed below.

North Division intake: 1300 664 977

South Division intake: 1300 655 795

East Division intake: 1300 360 391

West Division intake - metropolitan: 1300 664 977

West Division intake - rural and regional: 1800 075 599

If you are not sure which number to call, check the following website for details on the LGAs covered by each intake service at [Child protection contacts](https://services.dhhs.vic.gov.au/child-protection-contacts) <<https://services.dhhs.vic.gov.au/child-protection-contacts>>

*Please note, child protection reports cannot be made via the department's website or email.*

### For immediate help

To report concerns that are life threatening, contact Victoria Police: 000

To report concerns about the immediate safety of a child outside of normal business hours, contact the After Hours Child Protection Emergency Service on 13 12 78.

### What if I'm worried about a child's wellbeing, but I don't believe the child is in need of protection?

#### Child FIRST or The Orange Door

If you have significant concerns for the wellbeing of a child, but do not believe they are at risk of significant harm, and where the immediate safety of the child will not be compromised, a referral to Child FIRST or The Orange Door may be appropriate.

Child FIRST, as the access point for family services, is progressively transitioning to The Orange Door. The Orange Door is the new access point for families who need assistance with the care and wellbeing of children, including those experiencing family violence, to contact the services they need to be safe and supported.

Referring to Child FIRST or The Orange Door would be appropriate where families:

- are experiencing significant parenting problems that may be affecting the child's development
- are experiencing family conflict, including family breakdown
- are under pressure due to a family member's physical or mental illness, substance abuse, disability or bereavement
- are young, isolated or unsupported

<sup>1</sup> For further information, see the [Department of Treasury and Finance Indexation of fees and penalties](https://www.dtf.vic.gov.au/financial-management-government/indexation-fees-and-penalties) <<https://www.dtf.vic.gov.au/financial-management-government/indexation-fees-and-penalties>>

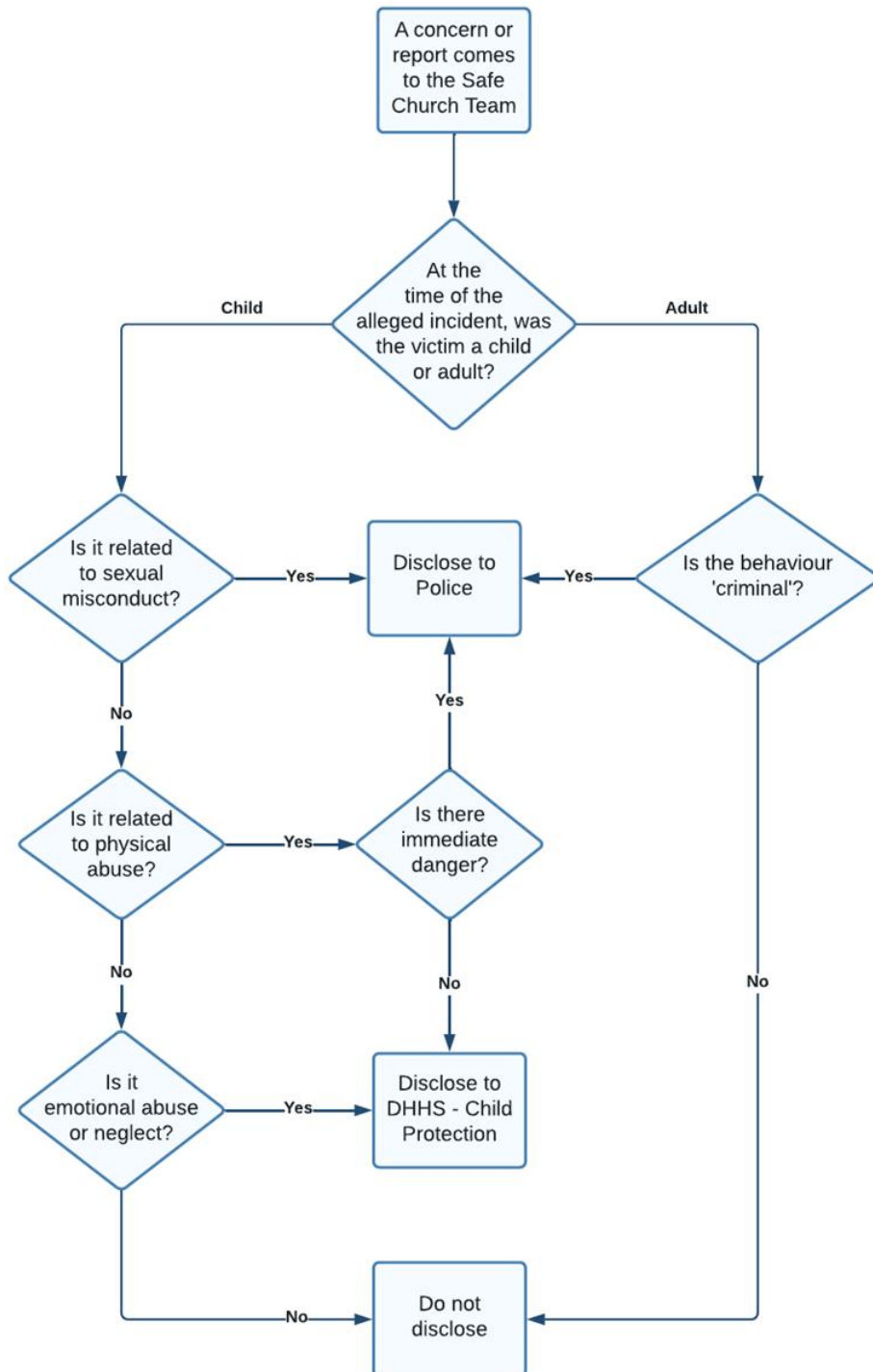
Mandatory reporting to child protection – People in religious ministry fact sheet  
Version 12 February 2020

## 2. External Disclosure Decision Tree

### Appendix 2:

#### External Disclosure Decision Tree

In addition to this process all concerns and reports that relate to the Victorian Reportable Conduct Scheme are reported to the Commission for Children and Young people in compliance with the requirements of the Scheme.



### 3. References:

**Hills Bible Church Documents:**

[HBC Constitution](#)

[HBC Leadership Code of Conduct](#)

[HBC Safe Church Policy: People, Church & Child Safety, Compliance](#)

**Incident Reporting Forms:**

[Child Incident Report](#)

[General Incident Report](#)

[Supplementary Incident Report](#)

[HBC Incident Register and Log](#)

**Relevant legislation and legislated requirements:**

Child Wellbeing and Safety Act (2005)

Victoria Worker Screening Act (2020)

Victoria Children, Youth and Families Act (2005)

Victoria Crimes Act (1958)

Victoria Privacy Act (1988)

Commonwealth Summary Offences Act (1966) Victoria

The Victorian Child Safe Standards

The Victorian Reportable Conduct Scheme

**Other Publications:**

[www.childsafestandards.org.au/](http://www.childsafestandards.org.au/)

[www.cyp.vic.gov.au/](http://www.cyp.vic.gov.au/)

[www.esafety.gov.au/](http://www.esafety.gov.au/)

[www.workingwithchildren.vic.gov.au/](http://www.workingwithchildren.vic.gov.au/)

[www.safechurchpcv.org.au/](http://www.safechurchpcv.org.au/)

## 2. Emergency Exit Map for Melbourne School of Theology

### Level 1 Emergency Exits

