

CROSSWAY BAPTIST CHURCH INC.

AND

CROSSWAY LIFECARE LTD.

CHILD PROTECTION POLICY

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Approved by	Crossway Board and Crossway LifeCare Board
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AMENDMENTS

Date	Part	Amendments
07.12.16	Part 6	Provisions permitting the use of social media included
18.04.17	Part 6	Information on Wrongs Act included
	Part 8	Previous Part replaced with revised Part 8 and other minor related changes made
	Part 10	Attachments included

1 DEFINITIONS

Actual/perceived conflict of interest	<p>--- arises when a person’s private interests:</p> <ul style="list-style-type: none"> • [actual]: improperly influences the performance of that person’s professional duties and responsibilities. It is based on actual things done"; or • [perceived]: could be perceived as improperly influencing the performance of that person’s professional duties and responsibilities, regardless of whether or not that has occurred."¹ <p>The private interests "can include but is not limited to, ‘personal, emotional, conscientious, sexual, familial, social, cultural, religious, spiritual, financial, business, political, professional or organisational factors’."²</p> <ol style="list-style-type: none"> 1. Royal Commission into Institutional Responses to Child Sexual Abuse: Case Study 18 2015:34) 2. Australian Association of Social Workers Code of Ethics 2010 5.1.7.a
Applicable law	See section 7.
Best interests	<p>These principles are in section 10 of the <i>Children Youth and Families Act 2005</i> include:</p> <ol style="list-style-type: none"> (1) For the purposes of this Act the best interests of the child must always be paramount. (2) When determining whether a decision or action is in the best interests of the child: <ul style="list-style-type: none"> • the need to protect the child from harm; to protect his or her rights: • and to promote his or her development (taking into account his or her age and stage of development) must always be considered.
Betrayal of trust	See Section 7
Child abuse	<p>Defined in the <i>Child Wellbeing And Safety Act 2005</i> as:</p> <p>"[C]hild abuse" includes—</p> <ol style="list-style-type: none"> a. any act committed against a child involving— <ol style="list-style-type: none"> i. a sexual offence; or ii. an offence under section 49B(2) of the <i>Crimes Act 1958</i> [grooming a child under the age of 16 years for sexual conduct]; and b. the infliction, on a child, of— <ol style="list-style-type: none"> i physical violence; or ii serious emotional or psychological harm; and c. the serious neglect of a child; <p>See Section 5 for a more comprehensive description.</p>
Child protection	<p>An activity or initiative to protect children from any form of harm, particularly arising from child abuse or neglect.</p>
Child/Children	<p>An individual or individuals below the age of eighteen years.</p>
Children accessing Crossway/LifeCare programs/activities	<p>Children who are:</p> <ul style="list-style-type: none"> • participants of a program or service offered by Crossway; • clients/participants of a program or service offered by LifeCare; or • in the care of an adult at the time when the adult is accessing a service offered by Crossway or LifeCare.
Crossway Head of Department:	<p>Crossway employees defined as a Head of Department (“HOD”) within their position role description.</p>
Employees:	<p>Employees are paid personnel representing Crossway or LifeCare.</p>

Reasonable belief	A belief based on reasonable grounds that child abuse has occurred when all known considerations or facts relevant to the formation of a belief are taken into account and these are objectively assessed. See Section 7 for a more comprehensive description.
Representative/non-representative	"Representative" and "Non-representative" are described in 4.2. The term "representative" is used when it applies to either Crossway or LifeCare representatives.
Safeguarding	Is any responsibility, measure or activity undertaken to protect children from abuse and other forms of harm.
Serious and imminent risk	A serious AND imminent threat to a child's health, safety or welfare - it consists of two aspects, both of which must be met - it must be: <ul style="list-style-type: none"> • serious - harm has occurred and/or there is risk of significant harm to the child; and • imminent - if no action was taken there is high potential of harm to the child
Supervisor:	Crossway: employees who have responsibility for supervision and/or have persons reporting directly to them in accordance with their position description LifeCare: employees who have responsibility for supervision and/or have persons reporting directly to them in accordance with their position description - this includes, but is not limited to the position titles: Team Leader, Head of Services, Executive Director and Chief Executive Officer.
This Policy	This term, when used, applies to this Policy.
Volunteers	Volunteers are unpaid personnel representing Crossway.
Working with children	Employees: Working in a position that involves regular contact with children, either as part of the person's position description or due to the context of the work that brings the person into regular contact with children. Volunteers: Working in a position that involves either regular or occasional contact with children.

2 ACKNOWLEDGEMENT

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Accessed via: <https://www.communitydirectors.com.au/icda/tools/?articleId=6737>

PART A - POLICY, RESPONSIBILITIES AND IMPLEMENTATION

3 POLICY STATEMENT

3.1 Context

In accordance with the United Nations Convention on the Rights of the Child and legislative requirements, Crossway Baptist Church Inc. ("CBC") and Crossway LifeCare Ltd ("CLL") recognises that all children have a right to:

- be and to feel safe;
- be provided with protection; and
- have the opportunity to flourish emotionally, socially, economically, educationally and spiritually.

3.2 Aims

The principal aims of this Policy are to:

- promote an organisational culture that prioritises the best interests of a child;
- ensure all who represent CBC and CLL understand their responsibilities and obligations on safeguarding children, including preventing abuse and reporting suspicions of abuse;
- ensure the safety and protection of children in the delivery of CBC's and CLL's programs; and to
- provide, as the basis for implementation:
 - definitions;
 - general principles;
 - an overview of some applicable law;
 - guidelines;
 - descriptions of roles; and
 - responsibilities of those covered by this Policy

3.3 Principles underlying this policy

CBC and CLL:

- commit to prioritising the best interests of all children participating or interacting with our programs and services;
- will promote a culture where a child's best interests will be considered paramount;
- have a zero tolerance of all forms of child abuse and will advocate that a child's best interests are upheld, both within our organisation and in other settings; and
- will ensure all children will be treated with the utmost respect and we commit to:
 - creating an inclusive environment where children from all cultures, religions and of all abilities, feel welcome and safe
 - engaging with children and families through inviting feedback and general reflections about their experience with the both organisations and individuals representing the organisations; and
 - engaging with external community supports and Government bodies in decision-making, where this will enhance our capacity to foster child safe practices;

CBC and CLL recognise their legal and moral responsibilities:

- to promote best practice and protect children from harm, abuse and neglect; and
- to ensure that any incidents of suspected child abuse are dealt with promptly and appropriately

4 SCOPE

4.1 Current and future legal entities

This Policy applies to both CBC and CLL. Any further legal entities established by CBC will automatically come within the terms of this Policy.

4.2 Application to Crossway/LifeCare representatives:

- A **Representative of CBC or CLL** includes, but is not limited to, employees, volunteers, members, partners, contractors, suppliers, donors, and Board and committee members.
- The CBC/CLL categories (and those who may be subsequently considered to come within the categories) will be referred to in this Policy as "CBC or CLL (whichever is applicable) Representatives" or by the term "representative" if there is no need for a specific distinction.

A **Non-CBC/CLL representative**: a person who does not come within the above categories.

5 RESPONSIBILITIES

Each person within the "Scope" (as set out in Section 4, above) shall comply with this Policy.

Promoting a child safe culture is a shared responsibility and representatives are expected to take appropriate and reasonable action to:

- facilitate an organisational environment that is supportive of a child's wellbeing and safety, abstaining from all conduct that would not be in the best interests of a child;
- familiarise themselves and comply with the applicable law, the relevant CBC or CLL Code of Conduct, and "CLL Child Protection Policy Code of Conduct"; and
- report reasonable suspicions of child abuse as noted in **Section 8**

In addition to these broad expectations, specific role responsibilities are as follows:

5.1 CBC/CLL Board Members

The CBC and CLL Boards have the ultimate responsibility for ensuring appropriate policies and practices are in place within CBC and CLL to minimise the risk of child abuse occurring in an organisation setting as well as strategies to appropriately respond to all suspicions and allegations of child abuse. The CBC/CLL Boards are required to understand and act in line with this Policy, and related Code of Conduct.

5.2 CBC Senior Pastor/ CLL Chief Executive Officer

The Senior Pastor/CLL Chief Executive Officer are accountable to the CBC Board and the CLL Board, respectively, for ensuring that appropriate policies and practices are implemented, monitored and reported on, and evaluated in a timely and diligent manner.

This includes the review of and understanding of this Policy, CBC's Code of Conduct, the reporting of any suspected child abuse (internal or external to CBC) to a Child Protection Officer or the relevant state child protection authority, Victoria Police and/or the BUV.

Furthermore, the Senior Pastor/Chief Executive Officer are required to:

- ensure:
 - reviews of organisational culture and attitudes towards child protection are performed; and
 - all CBC representatives are aware of the zero tolerance approach taken to abuse of children;
- promote and implement strategies that will safeguard children accessing services;
- promptly responding to any changes to child-related legislation other statutory

requirements, bringing these to the attention of the Board and ensuring any necessary response;

- provide or facilitate support to CBC/CLL representatives as they undertake their safeguarding responsibilities, ensuring that access to training and development and emotional support is provided; and
- ensure all representatives are aware of their obligation to report suspected abuse of a child, in accordance with this Policy

5.3 Delegation by Senior Pastor/CLL Chief Executive Officer

The Senior Pastor:

- may delegate any of the above responsibilities and duties to the to the Executive Pastor or any member of the CBC Executive Team; but
- shall retain responsibility for the activities; and
- shall ensure that delegated duties are actioned appropriately

The Chief Executive Officer:

- may delegate any of the above duties to the to the Executive Director or any member of the CLL Executive Team; and
- shall ensure that delegated duties are being actioned appropriately

All delegations of the above duties by the Senior Pastor/Chief Executive Officer shall be in writing.

5.4 CBC HODs and supervisors/CLL supervisors

All CBC HODs and supervisors/CLL supervisors are required to:

- understand, promote and act in line with this Policy and the CBC/CLL Code of Conduct;
- promote the best interests of a child/children at all times;
- be familiar with the types of abuse that might occur within their area of responsibility and be alert for any indications of such conduct;
- provide or facilitate education, training and support to their employees and volunteers regarding child safety and wellbeing; and
- seek consultation from the relevant CBC/CLL Child Protection Officer where required

5.5 CBC/CLL Child Protection Officers (CPO's)

CBC: There will be three CBC CPOs - the Senior Pastor, the Generational Ministries Pastor and the Director, Operation and Administration.

The appointments are to the positions named above and, in the absence of the person who normally undertakes the duties of the position, the CPO role will pass to the person acting in, or undertaking the duties of the role during the period of the absence.

The Senior Pastor has authority, at his discretion, to appoint another employee to fill either of the other CPO positions, either during an absence or instead of the designated of the CPO. Where the Senior Pastor has exercised his discretion to appoint a person to fill either, or both, of the other two CPO roles and the appointed person is absent then the Senior Pastor shall appoint another employee as CPO during the period of absence.

Any delegation and all appointments and shall be in writing.

CLL: There will be a single CLL CPO who shall be an employee of CLL and shall be appointed by the Chief Executive Officer or the Executive Director. The appointment shall be in writing. In the

absence of the CPO the Chief Executive Officer or the Chief Operating Officer shall appoint another employee to fill the position during the absence.

All CPOs: The CPO's are required to:

- understand, promote and act in line with this Policy and the applicable CBC/CLL Code of Conduct;
- make themselves available for consultation with any CBC/CLL representative or client relating to matters of child safety and wellbeing;
- provide advice and support regarding application and implementation of this Policy to any CBC/CLL representative;
- be proactive in raising any concern of this Policy in responding to child protection; and
- attend relevant child protection annual training

The **CBC CPOs** shall report directly to the Senior Pastor (the Senior Pastor reports directly to the Chairperson of the CBC Board).

The **CLL CPO** shall report to the Chief Executive Officer.

5.6 Employees and Volunteers

Employees and volunteers shall, as appropriate to their role:

- be familiar with, understand and act in line with this Policy and Code of Conduct;
- attend appropriate training and development on child protection issues, as required;
- proactively seek assistance and advice from HODs/supervisors and CLL executive team members/supervisors affecting the safeguarding of children; and
- participate in supervision, where this is a role requirement, and this shall include ensuring an understanding of child protection issues

5.7 Parents/Guardians/Carers and family members over 18 years

CBC/CLL parents, guardian, carers and family members over 18 years accessing CBC/CLL programs, service and activities are:

- to be advised of this Policy;
- provided with a summary of the Policy; and/or
- have access or, on request, be provided with this Policy statement and CBC's/CLL's Code of Conduct including the process of reporting any suspected child abuse

5.8 General responsibilities:

i) Taking and/or use of photographs/video/other electronic images of children

a. Photographs/video/other electronic images

CBC/CLL representatives will not take photographs, videos or other forms of electronic image unless

- it is explicitly permitted for the CBC/CLL representatives in undertaking their role; and
- is legally permitted; and
- consent:
 - is/has been obtained from parents/carers/guardians and, where appropriate, the child; or
 - for CBC only, can be implied from notices or advice given at an event or

- location; or
- has otherwise been obtained for specific activities or events and the appropriate consent and release forms have been completed

ii) Use of media and technology:

As a general principle, any communication (regardless of form) with a child external to the program or service that he/she is accessing, shall be made through her/his parent(s) or guardian(s). Further, and except to the extent, they are not contrary to the general principle:

- CBC/CLL representatives shall comply with ministry or program-specific guidelines which govern contact with children, both in-person and by other means; and
- except as provided below under ‘exceptions’, CBC/CLL representatives shall not communicate with any child or children accessing CBC/ CLL programs or services by using social media platforms or e-mail

Exceptions:

a. Express permission: E-mail correspondence and telephone conversations with a child may be allowed on a case-by-case basis, where expressly permitted by a HOD/CLL supervisor.

b. Generational ministries:

Interpretation: In this part (5.8 i) b.) ONLY, the following words shall mean:

Children:	children in year 7, or the equivalent, and above, involved in programs in the ministry area
Social media:	includes, but shall not be limited to Facebook, Instagram, Twitter, Messenger and any other means of electronic communication, including e-mail
HOD:	Pastor, Generational Ministry or other person undertaking the duties of the position
Ministry area:	ministry within Generational Ministries to children in year 7, or the equivalent, and above

It is acknowledged that the use of social media can be a significant and important means of communication with children involved in programs in the ministry area.

Consistent with this acknowledgement, the HOD may authorise adult leaders in the ministry area to use social media for communication with children.

The authorisation shall:

- be in writing, either an individual notice and/or a list to be held within the ministry area, of each person so authorised and may be for all, or part of, a calendar year;
- only be given to persons who, as a part of their role, are required to undertake communication with, and/or pastoral care of, children in the ministry area;
- not be given to any person who:
 - has not undertaken appropriate child protection training; AND
 - is not able to demonstrate an understanding of the limitations on the use of social media consistent with the expressed intention and spirit of this policy

At the start of each calendar year the HOD shall review the authorisation for leaders previously authorised. The HOD may renew the authorisation provided those persons:

- retain the need for the authorisation;
- have complied with the guidelines for use of social media in the preceding

- calendar year; and
- have undertaken child protection training in the previous calendar year or will do so within succeeding three calendar months

The HOD shall:

- compile and circulate guidelines on the appropriate use of social media to those leaders who are authorised to communicate with children in the ministry area through use of social media;
- as part of the ministry area's annual risk assessment, undertake a specific risk analysis of the use of social media within the ministry area - this shall include a review of the guidelines to ensure they are sufficient to militate against misuse of social media.

iii) **Risk Assessment and Management**

CBC/CLL will undertake a risk assessment, based on safeguarding principles, for each individual program area and its activities that:

- work directly with children;
- may involve contact with children; and/or
- have access to records relating to children

CBC: the risk assessments are to be completed and documented by the Facilities Manager and relevant HOD.

CLL: the risk assessment will be undertaken and documented by a member of the CLL executive team.

The risk assessment of:

- existing programs shall be reviewed annually over the life of the assessed program/activity; and for
- the review of new programs/activities shall be undertaken prior to the commencement of the program/activity

The documented risk assessments shall be kept on file and shall:

- identify risks, including an assessment of the physical environment;
- classify any high risk positions, individuals, activities and/or organisations; and document steps to be taken to reduce or remove risks; and
- be communicated to all CBC representatives affiliated with the relevant program area, once completed

iv) **Induction, review and exit interviews**

a. **Participant induction to Service**

CBC/CLL shall provide:

- a summary of this Policy to all participants in programs or services offered by CBC/CLL, which will contain information on how to access either an electronic or hard copy of this Policy;
- to children accessing programs or services an age appropriate written or verbal summary of this Policy detailing at minimum:
 - the purpose of the Policy
 - CBC's/CLL's commitment to best interest principles, and

- how they can raise issues or concerns
- on request by parent(s)/carer(s)/guardian(s) of a child client/participant of a program or service offered by CBC/CLL, either electronically or in hard copy, this Policy and the relevant CBC/Life Care Privacy Policy

b. Participant/client reviews and exit interviews

CBC/CLL believe that intentionally seeking feedback from children regarding their experiences and consulting with them regarding ideas for program development is a key component to fostering a child safe culture.

Where CBC/CLL programs, services and activities have a client/participant review and/or exit interview, and where the client/participant is a child, the review/exit interview will include questions that ask for the child’s perspective regarding their experience with the service and ask for ideas for how we may be able to improve our program delivery.

Parents/Carers/Guardians will be consulted and involved with the review process wherever possible.

Feedback will be provided to:

- a nominated CBC CPO who will compile a report based on the feedback, but which neither identifies nor will permit those included in the report to be identified, and provide it to the CBC Senior Pastor or delegate in the Executive team; or
- the CLL CPO who will compile a report based on the feedback, but which neither identifies nor will permit those included in the report to be identified, and provide it to the CEO or a nominated member of the Executive team

The feedback will be utilised to prompt reviews and changes to this Policy and procedure.

6 IMPLEMENTATION

CBC/CLL will undertake rigorous recruitment supported by induction and ongoing training in child protection. Coupled with collaboration with children and the broader community, ongoing supervision of employees and volunteers and strengthening positive leadership through effective management of conflicts of interest are seen as the means to advance each organisation’s capacity to create an environment where children are prioritised and protected.

6.1 Recruitment and Screening

CBC/CLL commits to following a thorough and clearly documented recruitment and screening process for all employees and volunteers which will involve:

- Ensuring all:
 - advertised positions; and
 - where necessary, Position Role Description provided to applicants
 - include a statement regarding CBC’s/CLL’s commitment to a child safe culture
- Submission of:
 - (for employees) a resume and Staff application form; or
 - (for volunteers) a program specific application form
- Completion and submission, where required by CBC, of a Safe Ministry form prior to the interview of potential employees.

- Completion of:
 - (CBC) a behaviour based interview:
 - **(employees)** by a panel of at least two CBC employees (one person being a HOD;
 - **(volunteers)** depending on the nature of the position, the employee with supervisory responsibility for the volunteer(s) may interview alone or with one or more persons
 - (CLL) a behaviour based interview:
 - **(employees)** by a panel of at least two CBC/CLL employees (one person being at least a CLL executive team member); or
 - **(volunteers)** with the express approval of the Chief Operating Officer or other executive team member, by a panel of two employees one of whom shall be a supervisor
 - a second interview (employees only) by an interviewer who is at least 2 reporting levels above the candidate's proposed role.
- Obtaining at least two (three for CLL) verbal reference checks, including at least one referee who can speak to an individual's suitability to work with children directly or incidentally as the position may require.
- **(For CLL applicants)** Completing a psychological test at the discretion of the specific program, if working alone in a private setting with children accessing services.
- Gathering additional information where concerns or uncertainties arise in the recruitment process, for example, conducting a 'Google' or 'linked in' search of an applicant's name which may help uncover inconsistencies or concerns relating to an applicant's history.
- Obtaining a Police check:
 - CLL: prior to engagement; or
 - CBC: prior to engagement where this required by CBC HR Policy
- Verification that a person is in possession of a current Working with Children's Check specifically for CBC/CLL prior to commencement in role
- Obtaining signed acknowledgement of commitment to the Child Protection Policy and Code of Conduct prior to commencement in role
- Each specific CBC/CLL program shall ensure that their respective recruitment processes include an assessment of the extent to which an individual can demonstrate they:
 - understand the importance of, and are committed to, appropriate boundaries when working with children; and
 - have an understanding of, and commitment to, child protection principles

6.2 Managing Conflicts of Interest

CBC/CLL recognise that:

- perceived or actual conflicts of interest involving representatives are a reality when working within the Church and related community; and
- when such conflicts are not appropriately managed decision-making may result in outcomes which are not in the best interests of a child

Examples of conflicts of interest:

- in cases of historical abuse there have been occasions when decision makers have put the interest of an organisation over the best interests of the child; and
- where those involved in investigating allegations of child abuse allow their personal interests to affect or influence a particular outcome

It is important to note that less evident conflicts of interest may arise and potentially have an impact on matters involving the best interests of children - for example:

- recruiting and supervision of employees/volunteers - where a candidate has a personal

connection to an intended interviewer/assessor or with other persons employed by CBC or CLL

- where representatives hold two roles within CBC and/or CLL for example: employees and volunteer or employee and employee

When a representative becomes aware that he/she may be in a situation in which conflicts of interest may arise, the relevant HOD/CLL executive member must be advised. In the event that the potential conflict may involve the HOD/CLL executive member then another HOD/Life Care Executive member must be advised.

The HOD/member of the CLL executive team, in undertaking an assessment on the potential conflict of interest shall consult with all appropriate persons, where it is appropriate and safe to do so, and may consult with any relevant external associations (for example, ChildWise, Australian Association of Social Workers, Australian Psychological Society).

CBC/CLL, as already noted, place the interests of the child above any organisational well-being. However, In the event that a conflict on interest may arise which may be contrary to the best interests of a child or children, then the representative shall not be permitted to engage in work in that setting.

6.3 Child protection training

All representatives who are likely to have direct or occasional contact with children within the context of their role are expected to have undertaken training in child protection or have a good knowledge of child protection issues. Prior to, or as soon as possible after commencement in their role, shall be provided with a copy of this Policy and child protection training.

All representatives shall undertake ongoing child protection training. The CBC/CLL executive teams shall determine the timing, extent and frequency of the training for employee and volunteers

6.4 Ongoing supervision of employees and volunteers

All CBC/CLL employees, volunteers and other representatives who have contact with children within the context of their role shall engage in ongoing supervision with the relevant HOD or supervisor/CLL supervisor.

- support representatives within the context of their role and to ensure they have access to all resources required to provide quality support to children accessing services;
- affirm a commitment to a culture of accountability and transparency;
- provide ongoing discussion and reflection regarding a child's best interests; and
- ensure ongoing compliance with this Policy and the Code of Conduct

6.5 Provision of this Policy

All representatives within the scope of this Policy must:

- be provided with, or have ready access to, a copy of this Policy;
- be briefed on the Policy as part of their orientation or induction; and
- be required to understand and follow the requirements of this Policy

6.6 Acknowledgement and compliance of the Policy and Code

All representatives within the scope of this Policy must:

- be provided with and sign (or electronically acknowledge) and agree to comply with the Child Protection Code of Conduct and Codes of Conduct
- comply with all applicable laws relating to working with children; and
- comply with the standards of conduct and behaviour established in the and Child Protection Policy and Codes of Conduct

PART B - PROCEDURES

7 OUTLINE OF APPLICABLE LAW

NOTE: This is not a full or complete description of all the applicable legislation, but rather an outline, with some sections in greater depth to provide a description of what can constitute child abuse.

For further information about this policy you should consult your CPO, HOD or supervisor.

The principal legislation covering child protection in Victoria is the *Children, Youth And Families Act 2005*. However, other legislation also addresses or includes child abuse issues - for example, the *Family Violence and Protection Act 2008*, *Child Wellbeing And Safety Act 2005*, *Crimes Act 1958* and the *Wrongs Act 1958*.

7.1 Definition of Child Abuse

A definition of child abuse is included in the Child Wellbeing And Safety Act 2005 (section 3) - it includes:

- a) **any act committed against a child involving—**
 - i. a sexual offence; or
 - ii. an offence under section 49B(2) of the *Crimes Act 1958* [grooming a child under the age of 16 years for sexual conduct]; and
- b) **the infliction, on a child, of—**
 - i. physical violence; or
 - ii. serious emotional or psychological harm; and
- c) **the serious neglect of a child;**

7.2 Description of Child Abuse

Child abuse encompasses:

Physical abuse – occurs when a child suffers or is likely to suffer significant harm from an injury inflicted.

- The injury may be inflicted intentionally or may be the inadvertent consequence of physical punishment or physically aggressive treatment of a child
- The injury may take the form of bruises, cuts, burns or fractures

Neglect – the failure to provide the child with the basic necessities of life such as food, clothing, shelter, medical attention or supervision, to the extent that the child's health and development is, or is likely to be, significantly harmed.

Emotional/psychological abuse – occurs when an adult repeatedly rejects a child or uses threats to frighten the child.

- This may involve name-calling, put downs or continual coldness, to the extent that it significantly damages the child's physical, social, intellectual or emotional development.
- Witnessing or exposure to domestic or family violence is also considered a form of emotional abuse¹

¹Section 7 of the *Family Violence Protection Act 2008* notes the meaning of emotional or psychological abuse:

-- behavior by a person towards another person that torments, intimidates, harasses or is offensive to the other person.

Examples—

- repeated derogatory taunts, including racial taunts;
- threatening to disclose a person's sexual orientation to the person's friends or family against the person's wishes;

Sexual abuse - occurs when an adult uses power or authority over a child to involve the child in sexual activity.

- Child sexual abuse involves a wide range of sexual activity - it includes: fondling, masturbation, oral sex, penetration in various forms and/or exposure of the child to pornography
- Physical force is sometimes involved

Grooming - involves predatory conduct undertaken to prepare a child for sexual activity at a later time.

- The offence applies where an adult communicates, by words or conduct, with a child under the age of 16 years or with a person who has care, supervision or authority for the child with the intention of facilitating the child's involvement in sexual conduct, either with the groomer or another adult
- Grooming does not necessarily involve any sexual activity or even discussion of sexual activity – for example, it may only involve establishing a relationship with the child, parent or carer for the purpose of facilitating sexual activity at a later time
- Grooming may include but is not limited to the following behaviours:
 - showing favouritism to a child;
 - giving gifts to a child and asking a child to keep secrets; and
 - testing or ignoring professional boundaries
- Grooming includes interactions with children either in person or via uses of technology

7.3 Children, Youth and Families Act 2005

There are comprehensive provisions in this Act which relate to the process of undertaking child protection and they are too lengthy to be included. For further information, contact should be made with a CPO.

a) In need of protection:

Section 162 notes those situations where a child may be in need of protection - these circumstances are similar to the grounds of abuse outlined above.

b) A belief on reasonable grounds:

Section 183 notes reports of abuse may be made where there is a belief on reasonable grounds, while section 186 notes the grounds for belief as:

- i. matters of which a person has become aware; and
- ii. any opinions based on those matters

In determining whether "a belief on reasonable grounds" other factors may need to be considered:

- A "reasonable belief" is formed if a reasonable person in the same position would have formed the belief on the same grounds.
- Circumstances or considerations may include:
 - the source of the allegation and how it was communicated;
 - the nature of and details of the allegation; and

-
- threatening to withhold a person's medication;
 - preventing a person from making or keeping connections with the person's family, friends or culture, including cultural or spiritual ceremonies or practices, or preventing the person from expressing the person's cultural identity;
 - threatening to commit suicide or self-harm with the intention of tormenting or intimidating a family member, or threatening the death or injury of another person.
 - intimidating a family member, or threatening the death or injury of another person.

- whether there are any other related matters known regarding the alleged perpetrator
- A ‘reasonable belief’ or a ‘belief on reasonable grounds’ is not the same as having proof, but
- example, a ‘reasonable belief’ might be formed if:
 - a child states that they have been abused;
 - a child states that they know someone who has been abused (sometimes the child may be talking about themselves);
 - someone who knows a child states that the child has been abused;
 - observations of the child’s behaviour or development leads a professional to form a belief that the child has been abused or is likely to be abused; and/or
 - signs of abuse lead to a belief that the child has been abused

c) **CBC/CLL reporting practices**

This section is to be read in conjunction with Section 2 of this Part of the Policy.

It is the practice in both CBC and CLL that allegations of child abuse based on a reasonable belief shall be reported to the appropriate investigating authority. Further:

- certain professional persons are mandatorily required under *Children, Youth And Families Act 2005* to report any situations where it is considered that abuse may have occurred; and
- any person who has a reasonable belief can make a report to the Police

Reporters are protected from legal and other action

7.4 Crimes Act 1958

The *Crimes Act 1958* contains a number of provisions involving offences against children - for example: indecent act with child under the age of 16, persistent sexual abuse of child under the age of 16, sexual penetration of 16 or 17 year old child, indecent act with 16 or 17 year old child, facilitating sexual offences against children and grooming for sexual conduct with children under the age of 16 years

In addition to these, and other provisions, two are of significance:

- **"Failure by person in authority to protect a child from sexual offence"** (section 49C):
- This has also been called **"betrayal of trust"**. It is an offence by a person in a position of authority who knows there is risk of abuse and has the power or responsibility to reduce or remove the risk, but negligently fails to do so.
- **"Failure to disclose sexual offence committed against a child under the age of 16 years"** (Section 327):

Generally, an adult who forms a reasonable belief that a sexual offence has been committed by an adult against a child under the age of 16 has an obligation to report that information to police.

7.5 Child Wellbeing and Safety Act 2005

In accordance with section 17 of the *Child Wellbeing And Safety Act 2005* the relevant Minister may make "Child Safe Standards". The intention of the Standards is, as noted in the section, to ensure

- the safety of children is promoted; and
- child abuse is prevented; and
- allegations of child abuse are properly responded to

The Standards are used to ascertain the effectiveness of a child protection program and this Policy has been assessed for compliance using the Victorian Government self-audit template.

7.6 *Wrongs Act 1958*

The *Wrongs Act 1958* has been amended (March 2017) with the inclusion of Part XIII. The major effect of the provisions is to reverse the onus of proof for actions in negligence against an organisation for failing to prevent child abuse. The new provisions will apply to CBC and CLL.

Previously, a person wishing to make a claim in negligence in these circumstances needed to establish his/her case. However, the new provisions:

- establish a statutory duty of care which will form a part of any claim of negligence;
- place an obligation on organisations to "prevent the abuse of a child" when "under the care, supervision or authority of the relevant organisation"; and
- presume the organisation has breached its duty of care unless the relevant organisation proves, on the balance of probabilities, that it took reasonable precautions to prevent the abuse in question.

While these provisions may sound heavy-handed and onerous they are intended to ensure that organisations accept their responsibilities to provide and maintain a safe environment for children - this is clearly what CBC and CLL seek to do in applying the principles in this Policy.

8 RESPONDING TO SUSPECTED CHILD ABUSE

IMPORTANT NOTE: CBC/CLL have a zero tolerance of child abuse, in any form, and the following procedures are intended to place the best interest of the child above any other interest.

ATTACHMENT: Attachment 10.2 "Responding to suspected child abuse" is a flowchart outlining the processes to be followed in Parts 8.1 and 8.2.

This section notes the processes for responding to concerns about a child's safety or wellbeing by:

- CBC representatives, members of the congregation and others accessing CBC's programs and services; and
- CLL representatives and clients and participants accessing CLL's programs and services

8.1 Concerns and Complaints on the conduct of a representative (see 4.2 for description of "representative"):

a) Reporting Concerns and Complaints

Any person who has a concern or concerns about a child/ren shall be encouraged to speak with a CBC/CLL employee (who, as noted in (c), below) shall inform a CPO or other relevant Executive Team member of the complaint about the abuse/potential abuse.

In the event there is a serious and imminent risk to the child (see definition of this term) the matter should be reported to the Police without delay.

While any CBC/CLL employee or representative can be contacted regarding concerns or complaints, CBC/CLL employees members best equipped to receive a concerns/complaint are:

CBC

- Executive Team Members
- Child Protection Officers (CPO's):
 - Senior Pastor,
 - Generational Ministries Pastor
 - Director of Operations

CLL

- Chief Executive Officer/Executive Director
- Head of Services
- Operations Manager
- Child Protection Officer

CBC/CLL shall treat all concerns and complaints with the utmost respect. Reporting concerns shall not affect the capacity of the individual, who is the victim of the abuse and/or the person reporting, to receive services and supports from CBC/CLL.

b) Documenting a concern and/or complaint

Documentation: Any representative receiving information regarding a concern and/or complaint (where the alleged perpetrator is another representative) must document the specific details regarding the alleged incident.

"Suspected Child Abuse Report" - if this form has not been completed it should, preferably, be completed by the CBC or CLL representative to whom the disclosure was made or has a concern for a child.

A child's instincts/responses: Children may have "gut" instincts and responses to persons and situations that they are unable to substantiate with evidence - these feelings shall be taken seriously by CBC/CLL.

Gaining information: In talking to a child about possible abuse:

- No pressure should be placed on the child to provide information beyond what they feel comfortable communicating.
- The focus should be on ensuring the child feels heard and affirmed, that they are being taken seriously, and that, where appropriate, they are advised of what will be done with their disclosure and information.
- Regardless of whether a concern/complaint is made to a representative by a child or by an adult (regarding harm to a child), the representative should ensure they are not asking leading questions (that is, questions which suggest or imply what the response should be) when attempting to capture the nature of the complaint/concern.

c) Communicating a concern and/or complaint to a member of the CBC/CLL Executive Team

On receiving the complaint/concern, the representative shall urgently report the matter to a CPO or CBC/CLL Executive Team member. Where this is not possible or there is imminent risk to a child then the matter should, where possible, be discussed with a team leader or supervisor. As soon as possible, information must be reported to CBC or CLL CPO or Executive Team member.

i Assessing whether a reasonable belief exists (see also "definition"):

In assessing whether a reasonable belief that abuse or harm to a child exists, the CBC/CLL Executive team member(s) will discuss and do any or all of the following:

- consult with an external service such as the 'Baptist Union of Victoria', 'ChildWise' and/or 'Child First';
- consult with a reporting body such as Child Protection of Victoria Police;
- gather further information to better inform their consultation and assessment, however, not to the extent that they are conducting an investigation or seeking to determine plausibility of the complaint/concern.

ii Taking appropriate action:

Where a reasonable belief of abuse is found to exist, the CBC/CLL executive team members will immediately report this to an external body for further investigation (for example, the police).

In addition to contacting any external services for investigation (for example, the Police), the provision of necessary support services (for example, counselling) should be arranged.

Where the complaint/concern is considered not to be child abuse related, but may indicate a breach of Policy or Code, an internal investigation shall be undertaken (as

stipulated below).

A child's parent/guardian/carer must be made aware of the complaint/concern and the action(s) to be taken. The CBC/CLL Executive team will manage the complaint and decide on the timing of this. However, it is expected that this occur as soon as possible and (where necessary/applicable) with the permission of the external investigators.

Where an investigation occurs (internally or externally), the representative who is the subject of the complaint/concern, should have no contact (direct or indirect) with children accessing CBC/CLL programs, activities and services. CBC/CLL employees may be suspended (with pay) until the outcome of the investigation is known. CBC/CLL will provide the representative, the subject of the complaint/concern and investigation, and their family with access to supports they may require (for example, counselling).

iii Co-operation with an external investigation

If the external body (for example, Police or regulatory body) decides to conduct an investigation, all representatives must co-operate fully with the investigation.

At the completion of an external investigation or where an external body decides not to conduct an investigation, the CBC or CLL executive team shall determine whether an internal investigation is appropriate.

d) Determining if it is appropriate to conduct an internal investigation

Where it is appropriate and necessary to undertake urgent action and, regardless of whether the external body/Police decide to conduct an investigation:

- the Senior Pastor for matters involving CBC representatives; and
- the CLL Executive Team for matters involving CLL representatives

shall determine whether an internal investigation is appropriate.

If there is an external body, such as the Police or a regulatory body involved in the matter, the CBC/CLL executive team member managing the complaint shall seek advice from the investigating body how as to how CBC/CLL should proceed, before any internal investigation is undertaken.

Assistance may, for example, be required from CBC/CLL in investigating aspects of the complaint (for example, any employment-related misconduct).

CBC/CLL may be advised not to take any action internally until an external investigation is completed. CBC/CLL will liaise with external bodies to ensure children and families impacted by this complaint have access to supports they may require, such as counselling and medical assistance.

Where it is permitted and appropriate to do so, the Executive team member managing the complaint will liaise directly with the child and family to explore specific support needs.

e) Conducting an internal investigation

When the CBC/CLL executive team deems it is appropriate and warranted to undertake an internal investigation an appropriate investigator will be appointed.

Given the serious criminal nature of child abuse and the necessity for transparency, the CBC/CLL executive team member managing the complaint will engage the services of a suitably qualified and independent investigator who is not connected with either CBC or CLL to lead this process.

Irrespective of the outcome of any external investigation, should an internal investigation find that a breach of policy/procedure/code has occurred, disciplinary action may be taken appropriate to the situation, including dismissal.

For consequences of breach of policy, see **section 7**.

CBC/CLL will make every effort to keep any such investigation confidential. However, from time to time external agencies or other CBC representatives may need to be consulted in conjunction with the investigation.

i. Collecting all relevant information:

All parties to the internal investigating of a complaint must be afforded procedural fairness, otherwise the findings of the investigation may not be deemed fair or reasonable.

To ensure procedural fairness the representative must be made aware, in sufficient detail, of the allegations made against them and must be allowed a reasonable opportunity to respond to each of the allegations. This action shall not be undertaken without the express permission of any external investigators and shall only be facilitated by an independent investigator.

The representative under investigation has the right to :

- request that an observer be present in any meetings they are required to attend; and
- will have the opportunity to respond to complaints verbally within a meeting or/and via written submission after the meeting.

The investigator may also seek to interview any witnesses and collate all relevant documents. The investigator must:

- not compel any witness to provide information; and
- must have express consent to gain any information from witnesses or other persons.

They should prepare a signed witness statement for each participant to record their version of events.

ii Produce a comprehensive report:

Based on the information collected as part of the investigation, the investigator shall prepare a comprehensive report setting out his/her findings on the balance of probabilities, as well as their reasoning for the findings.

All information collated as part of the investigation should be attached to the investigation report and stored in a locked filing cabinet, in a secure location to maintain confidentiality.

Regardless of the outcome of any investigations, report/s will also be filed within a CBC employees personnel file.

8.2 Child abuse concerns in relation to a non-CBC/CLL representative (see 4.2 for description of "non-representative")

When a representative suspects or is made aware of a suspicion that a child is being abused by their parents, carers, guardians or any other adult (not a CBC/CLL representative), the representative should document the facts he/she observed gained using the "Suspected Child Abuse Report ".

The representative may (but is not required to) consult with the relevant CBC or CLL CPO to decide if their belief is reasonable.

a) Representative should report their reasonable belief to their HOD/CLL supervisor and/or the Police

i	Where the concern relates to a serious and imminent risk of harm to a child or a reasonable belief that a child under the age of 16 is at risk of experiencing, or has experienced sexual abuse: <ul style="list-style-type: none">• the CBC representative should contact '000' directly to advise of concern and inform a HOD of the decision/action ; and• the CLL representative should contact '000' directly to advise of concern and inform
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	a supervisor of the decision/action as soon as practicable.
ii	The HOD/supervisor if consulted prior to a decision being made, will provide advice to the CBC representative with regard to what action, may be required. This advice should include, in particular, whether information needs to be reported to an external agency for investigation and how and when this should occur.
ii	<p>The CBC representative will report their reasonable belief to a member of the CBC Executive Team (instead of their HOD) when:</p> <ul style="list-style-type: none"> • The Representative does not have a HOD, or • Their HOD is not available, or • After consultation with their HOD, the Representative does not agree with the assessment of their HOD. <p>The CLL representative will report their reasonable belief to a member of the CLL Executive Team (instead of their supervisor) when:</p> <ul style="list-style-type: none"> • The Representative does not have a supervisor, or • Their supervisor is not available, or • After consultation with their supervisor, the Representative does not agree with the assessment of their supervisor.

b) Representative shall take action in accordance with the direction provided by the HOD/ CLL supervisor:

Actions may include, but will not be limited to:

- contacting Child First/ChildWise
- contacting Child Protection
- contacting Police
- referring Parent/Carer/Guardian and/or Child to additional support services

c) Representative to document outcome of consultation and actions taken:

This should be on the "Suspected Child Abuse Report" and should be submitted to a CPO or member of the CBC/ CLL executive team for safe record keeping.

d) Advising children and parents/carers/guardians of concerns and actions taken or to be taken:

Wherever safe and appropriate to do so, children and their parent/carer/guardian should be informed of concerns developed and actions taken/to be taken to safeguard a child.

CBC/CLL reserve the right to not disclose when a CBC representative makes a report to Child Protection, Police or Child First, especially where doing so might further jeopardise the safety of a child.

8.3 Storage and retention of "suspected child abuse report forms"

The "Suspected Child Abuse Report" forms referred to in sub-section 8.1 and 8.2 are, on the completion of the action by CBC or CLL and/or external investigating agencies, to be stored confidentially by the designated CBC and CLL CPO or Executive team member in the following situations:

- if it is considered by the CPO or Executive team member that there is no basis on reasonable grounds to refer the matter for external investigation and/or to undertake an internal investigation;
- where there has been no referral for an external investigation, but an internal investigation has been undertaken;

- where the matter has been referred to an appropriate external investigating agency for action and, if required, an internal investigation has been undertaken

for a period of not less than 50 years

This action is to be taken so that CBC or CLL will be able to show, in the event of any subsequent historical enquiries, the nature of the complaints received and the action to protect the interests of the child.

Procedure:

a. CBC:

The original form (if not required by any investigating body or otherwise a clear copy of the form) and any related material created or obtained as a consequence of any external and/or internal investigation shall be retained by the designated CPO/Executive team member once all the appropriate places on the form has been completed and it is signed off by the designated CPO/Executive team member.

b. CLL:

Retention of the form and any related material shall be on the same basis as CBC.

A copy of the form may also be kept on the relevant client file.

9. CONSEQUENCES FOR BREACH OF THIS POLICY

A breach of failure to comply with the Policy or the Code of Conduct may give rise to the following measures:

- Meeting with CBC HOD/CLL supervisor to discuss breach or lack of compliance
- An internal investigation occurring, facilitated by an independent investigator (not affiliated with CBC Baptist Church or CBC CLL)
- Formal warning being issued
- Report being made to external agencies, i.e. Professional Associations and/or Police
- Close monitoring and live supervision
- Further education being required before recommencing in role
- Any other performance management strategy deemed appropriate
- Immediate suspension
- Immediate termination of membership
- Immediate termination

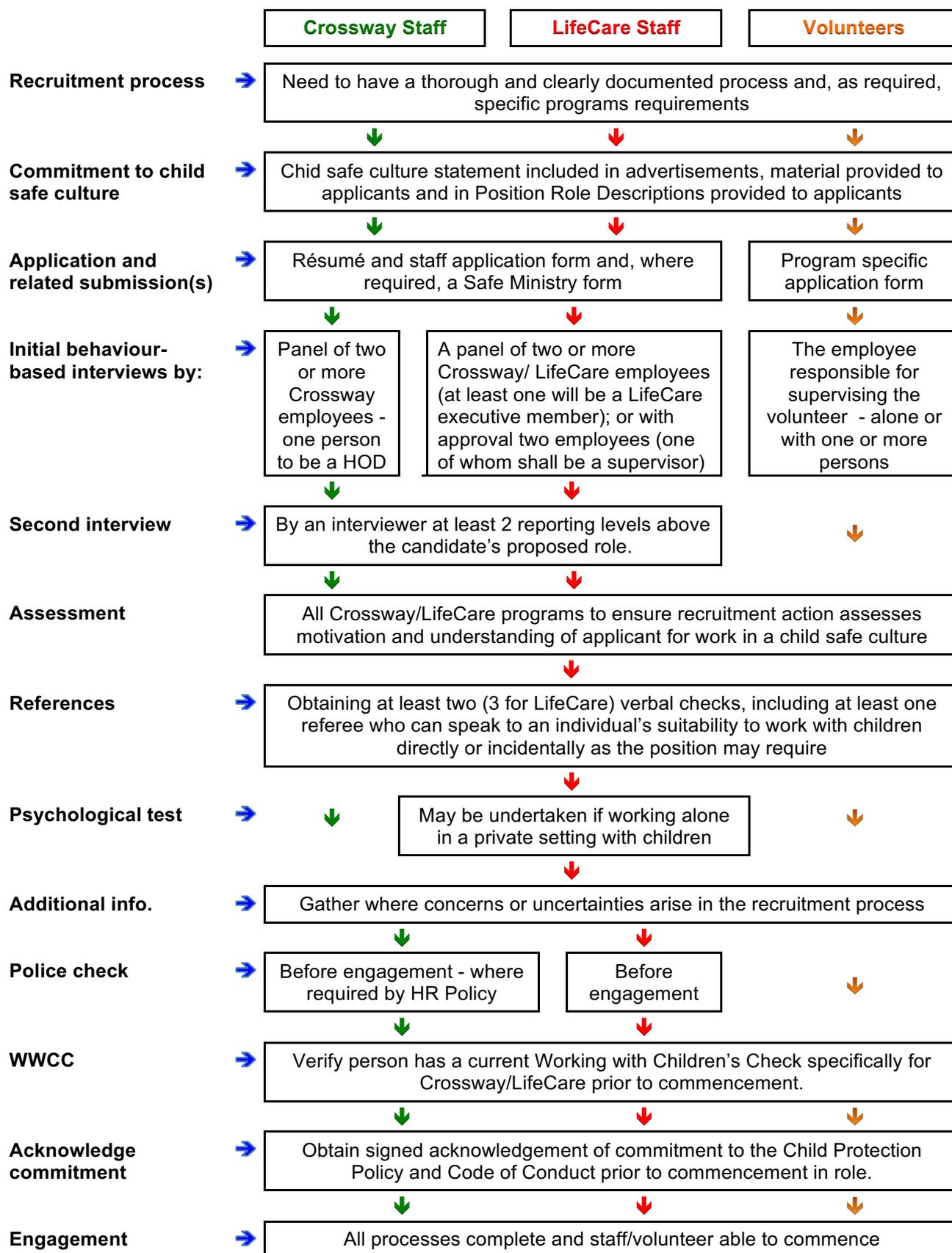
These measures will apply regardless of any criminal investigation or prosecution. Any actual/ suspected breaches will be documented and stored on a CBC representative's personnel file.

10. ATTACHMENTS

- 10.1 Recruiting
- 10.2 Responding to suspected child abuse
- 10.3 Crossway/LifeCare Suspected Child Abuse Report Form
- 10.4 Crossway Code of Conduct
- 10.5 LifeCare Child Protection Policy Code of Conduct

Attachment 10.1 Recruiting

NOTE: This is a summary only - see text for full information on processes and requirements.

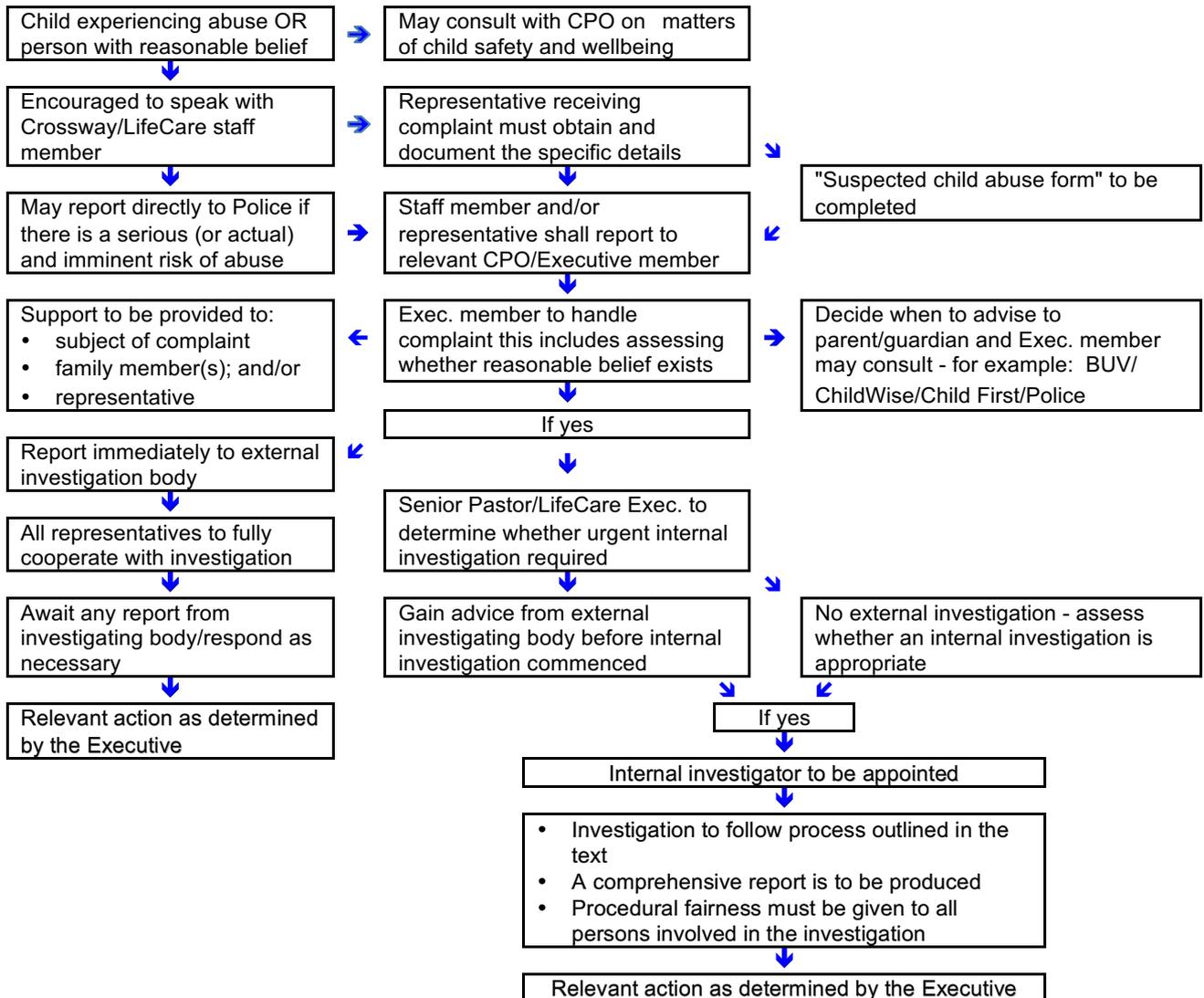


Attachment 10.2

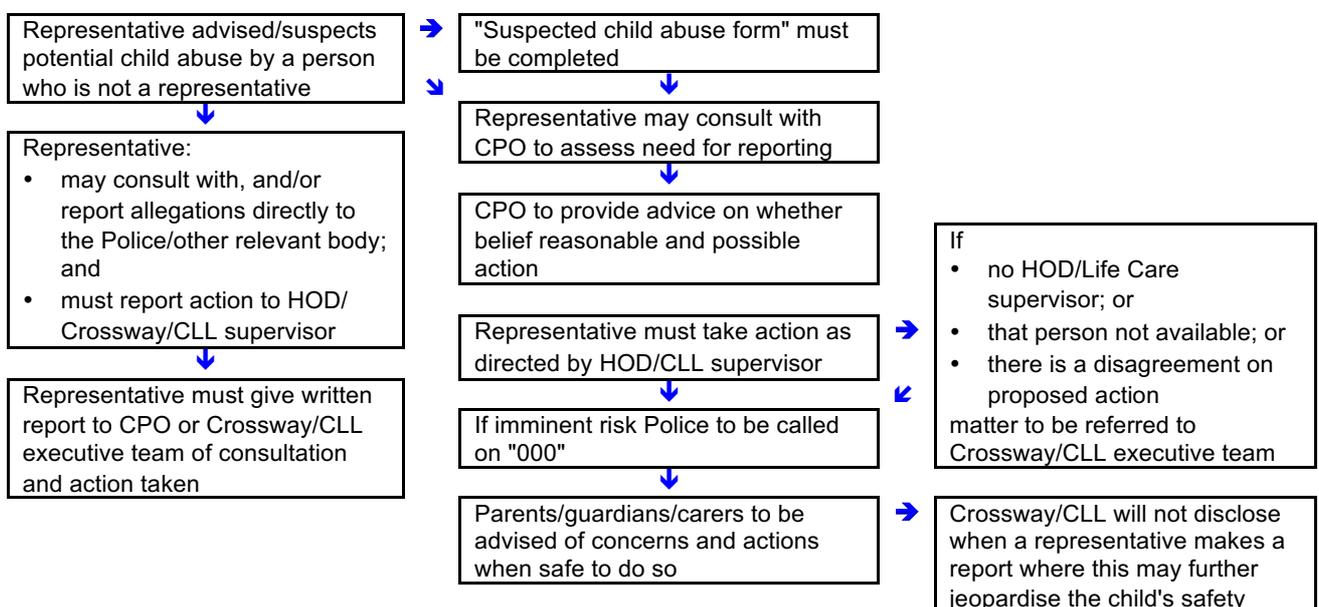
Responding to suspected child abuse

NOTE: These charts are summaries only - see Part 8 for full information on processes and requirements.

a. Concerns and complaints on the conduct of a Crossway/LifeCare representative



b. Concerns by Crossway/LifeCare representative of abuse by non-representative



Attachment 10.3

SUSPECTED CHILD ABUSE REPORT

This form is to be used by CBC/CLL representatives for recording child abuse concerns and how the concern has been managed. The perpetrator may or may not be a CBC/CLL representative.

SECTION A - PRELIMINARY INFORMATION

PART A: Crossway/LifeCare representative providing details of concern/s (if NOT the same person completing the form)

Full name:	
Position/role:	
Contact number:	

PART B: CHILD IMPACTED:

NOTE: If more than four children please attach list.

Full name	Date of birth	Age	Gender		Address	Phone
	/ /		F	M		
	/ /		F	M		
	/ /		F	M		
	/ /		F	M		

Additional comments on family including cultural background:

Aboriginal: Torres Strait Islander: Both: *Tick if applicable*

PART C: DETAILS OF INCIDENT/WHEN DISCLOSURE MADE/REASONS FOR YOUR CONCERNS:

Date & Time: / /

Description of disclosure/observations:

Nature of Harm/Abuse: *Do your concerns come within the following categories. If you are uncertain note the nature of your concerns*

Physical abuse
 Sexual abuse
 Emotional/psychological abuse
 Neglect
 Other (please specify):

Was there a serious AND imminent threat to a child's health, safety or welfare - please note immediate safety concerns and describe including names of other witnesses, description of any injuries, behaviour - add pages if required:

Immediate Actions Taken (including informing others or discussion with child) - *please note: include date, time, and outcomes/discussion for each incident or action:*

PART D: SUSPECTED PERPETRATOR *(Complete if details known)*

Full name:			Phone:	
Age:	Years	Gender	Male	Female
Address:				
Does the alleged perpetrator know about the report? IF YES:	Date: / /	Time:		Contacted by:
What was he or she told?:				

PART E: NAME OF PARENTS/GUARDIANS/CARERS *(Complete if details known)*

Full name:			Phone:	
Address: <i>(If different to the child)</i>				
Relationship to the child:				

PART H: PERSON WHO COMPLETED SECTION A

Full name:	
Position/role:	
Contact number:	
Signature:	Date:

IMPORTANT:

- *If the concern relates to a CBC/CLL representative, please pass the form to members of Exec/HOD or CPO for completing the rest of the form.*
- *Otherwise, please continue completing this form OR where relevant, pass to your Supervisor (LifeCare) or HOD/CPO (Crossway) for completion.*

SECTION B – RESPONSE/ACTIONS FOLLOWING INCIDENT

PART A: PERSON COMPLETING THIS SECTION

Full name:	
Position/role:	
Contact number:	

PART B:

Details of Responses/Actions Taken *(including further discussion with child/family, information provided to police, internal/external consultation undertaken, child protection notification, information provided to Child First.):*

Date	Time	Person(s) taking Action	Action Taken	Outcome

[Please note: date, time, and outcomes/discussion for each response or action]

If NO REPORT is being made to external services, please state reasons for this:

Signature:

Date:

PART B NAME OF EXEC TEAM/CPO/SUPERVISOR (CLL) OR EXEC TEAM/HOD/CPO (CBC)

Name/Position:

Signature:

Date:

(Please pass form to member of executive team/HOD/CPO for retention purposes)

SECTION C – RETENTION OF REPORT

PART A: NAME OF PERSON RECEIVING REPORT FOR RETENTION

Name:

Signature:

Date:

PART B: LIFECARE USE ONLY *(where client/participant is involved):*

Report placed in client/participant's file by:

Name: _____ **File number: (if applicable)** _____ **Date:** _____

CROSSWAY BAPTIST CHURCH INC.

CODE OF CONDUCT

Effective Date	8 November 2016
Approved by	Executive Team
Author	DOA and Governance Assistant Manager
Next Review Date	November 2018

Crossway's Code of Conduct provides guidelines on appropriate boundaries rather than assuming that people know what the appropriate boundaries are. Through His Word, God directs us to live out our ministry roles with integrity, enthusiasm, compassion and patience. (2 Tim 4:2, 2 Tim 4:5, Eph 2:10), This code is an expression of these directives from the Bible.

Crossway expects these values to be embraced by those in leadership in their personal lives and as they exercise their ministry.

This Code also provides a step-by-step process for loving leaders through a process when they break or damage the code. This code is not a set of laws to be added to grace, but rather, expressions of our love towards each other and the people to whom and with whom we minister.

a. We will minister out of a relationship with God by:

- joining regularly in the life and ministry of Crossway.
- studying the Scriptures in private and in groups.
- praying regularly in private and in fellowship with and for the people and ministry of the Crossway.
- giving of our time and finances to the work of Crossway as an expression of our gratitude to God.

b. We will serve others in the context of healthy relationships by:

- loving and caring for our families; paying attention to the effect of ministry on them.
- treating others with respect; teaching and exercising authority respectfully.
- upholding confidential information; not disclosing to anyone (including spouses) any confidential information without the consent of the person providing the information. (There is an exception where there is a legal obligation or a duty of care issue).
- being a team player; cooperating with other ministry leaders.
- using words that build up; not ridiculing or embarrassing people.
- avoiding professionally counselling people with whom we have personal relationships.
- making alternative arrangements for pastoral ministry for any person if we begin to develop a romantic connection to them.

c. As Christian leaders we will:

- be accountable to our team; watch out for each other and protect each others' integrity e.g., practicing a 'never alone' approach to ministry with children, young people and vulnerable adults.
- communicate with integrity, including accountable and wise use of electronic communication; commit to following our team guidelines for electronic communication.
- obey the law, other than any law that is contrary to the Scriptures.
- not take property belonging to others, including intellectual property (copyright) and knowingly making false, misleading or deceptive statements.
- not engage in bullying, emotional abuse, harassment, physical, sexual or spiritual abuse of any person, including our family.
- not act violently or intentionally provoke violence when engaged in civil disobedience.

- be responsible in our use of addictive substances and services (e.g., prescriptions/alcohol).
- not use any prohibited substance.
- act with sexual purity. Sexuality is a gift from God. We will express our sexuality in healthy and God directed ways. Not use pornography for sexual gratification.
- act with financial integrity.
- have in place systems for accountability and transparency in financial matters.
- not seek personal advantage or financial gain from our position, other than in wages, recognised allowances and deductions.
- disclose to the Crossway leadership if we are or have been investigated for any criminal offences or have any knowledge of serious criminal activity.

When the code is breached: what happens when leaders do not follow this code?

(i) Minor violations

Everyone sins and is forgiven (1 John 1:8-9). It stands to reason then, that the code will be breached. When this happens in an area that is not a breach of civil or criminal law, simply cease the conduct. If this is difficult, the person should see their team leader and/or Head of Department about receiving help (e.g. counselling). In some cases, it may be necessary to step a person aside from their duties whilst this takes place. Deal with such matters confidentially.

(ii) Unknown violations

Not all leaders will understand ‘unacceptable’ behaviours. Even after explaining the code some may be unaware they are exhibiting unacceptable behaviours. Leaders need to be open to correction and humble enough to modify behaviours so as not to discredit the gospel. As above, stepping a person aside their duties may be necessary.

(iii) Constant violations

There are breaches that are not a breach of civil or criminal law. Nevertheless, when a leader has been made aware of their behaviour and yet refuses to change:

- a) The Head of Department meets the person for behaviour review meetings. Communicate required behaviour changes. (Up to 3 meetings).
- b) If the behaviour continues, an Executive Team member, along with the Head of Department, are to arrange a meeting to address the behaviour. Stepping someone aside is appropriate at this point.
- c) If the behaviour/s continues beyond this meeting, then respectfully, and upholding confidentially, the person will be stood down for a set period. They will be offered help in changing their behaviour via counselling, if they are willing.

NB: Written notes of all meetings are to be carefully taken and copies given to all parties.

(iv) Breaches of the law or allegations of abuse.

Allegations of abuse or serious misconduct are to be referred to the Executive Team and the police and may result in termination. Refer also to Crossway’s Child Protection Policy.

Acknowledgement:

Full Name:		Date:	
Signature:			



Child Protection Policy - Code of Conduct

This Code of Conduct is for all Crossway LifeCare Representatives (CLRs); including but not limited to employees, volunteers, donors and board and committee members, as stated in the Crossway LifeCare (CLL) Child Protection Policy.

As a CLR, I am responsible for supporting the safety, participation, wellbeing and empowerment of children, and **I WILL**:

- Adhere to Crossway LifeCare Child Protection Policy at all times.
- Take all reasonable steps to protect children from exploitation and abuse.
- Treat all children fairly, and with respect and dignity, regardless of race, colour, gender, sexual orientation, language, religion, political or other opinion, natural , ethnic or social origin, property, disability, birth or other status.
- Promote the safety and wellbeing (including cultural safety), participation and empowerment of children with disability and children from linguistically and culturally diverse backgrounds by ensuring my conduct is in no way discriminatory, and my decision making is sensitive to their special needs.
- Avoid physical contact with children accessing our services, unless this is necessary for the health or safety of the child, or for performing my specific role in CLL.
- Commit to a culture of openness, and as such I will not ask children to keep secrets, nor will I promise to keep secrets if asked.
- Listen and respond to the views and concerns of children, particularly if they are telling me that they or another child has been abused and/or they worried about their wellbeing, safety or safety of another.
- Immediately report concerns or allegations of child abuse in accordance with the procedures stated in Section 6 of CLL's Child Protection Policy. If I believe a child is at immediate risk of harm, I will phone 000.
- Wherever possible, I will ensure that another adult is present when working in the proximity of children.
- If my role in CLL requires me to meet one-to-one with a child, I will meet at a place easily visible and accessible to other adults.
- If my role in CLL requires me to transport or be alone with a child, I will obtain consent from the parents/guardians of the child and my supervisor before I do so. I will also inform the parents/guardians where, when and what activity that the child and I will be doing before meeting the child alone. I will also inform my supervisor about the details of my contact with the child within program-specific timeframes.
- Where the law and my role in CLL permits, obtain informed consent of a child and their parent or guardian for the taking and use of their images and stories; disclosing, when seeking consent, details as to how and where the images will be used, as per Adult Story and Image Consent and Release Form. The images and stories I capture must portray children in a dignified and respectful manner.
- Respect the privacy and confidentiality of children accessing our services.
- Seek help from CLL should I feel overwhelmed or need assistance in the context of my work with children.

- Immediately report any breach of this conduct to my immediate supervisor or Child Protection Officer.

As a CLR, I **WILL NOT**:

- Use language or behavior towards children that is, or could be interpreted as, inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Use physical discipline or in any way punish a child.
- Do things of a personal nature that children can do for themselves, such as toileting or changing clothes.
- Engage children in any form of sexual activity or acts, including paying for sexual services or acts.
- Invite children accessing our services into my home without the explicit consent of my supervisor and the CLL Executive Team.
- Meet with or communicate with (including email, phone, social media etc.) any child accessing our services without the expressed consent of my immediate supervisor and the child's parent/guardian.
- Develop any 'special' relationships with children, beyond what is required of me in my role in CLL, that could be seen as favoritism.
- Abuse the power and influence I have by virtue of my position over the life and wellbeing of a child.

I agree to adhere to this Code of Conduct, and in signing this, acknowledge that I have read, understood and will act in accordance with the CLL Child Protection Policy.

I understand that breach of this Code of Conduct may give rise to disciplinary action being taken against me.

...../...../.....
Name Signature Date