



## POLICY AND PROCEDURE

### Safe children's and youth ministry

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## 1. Introduction

Lighthouse Church is committed to providing an open, welcoming and safe environment for all children, young people and adults. Children are entitled to be safe and protected. They have the right to be respected, listened to, and to have their particular needs addressed in church activities. Ministry where children are involved requires absolute trustworthiness<sup>1</sup>.

Lighthouse Church loves and values children as Jesus did. It is a privilege to teach and instruct our children and contribute to their understanding and love of God. The following information outlines procedures for screening and training children's/youth ministry workers to ensure the safety and welfare of children and youth in our care, and to minimise the risk of anything detracting from our mission of 'Building Christ's Church by proclaiming God's Word'.

## 2. References

The information contained in this document has been developed with reference to:

### Legislation

- *Child Protection (Working with Children) Act 2012*
- *Child Protection (Working with Children) Regulation 2013*

### NSW government guides

- Office of the Children's Guardian [www.kidsguardian.nsw.gov.au/Working-with-children/working-with-children-check](http://www.kidsguardian.nsw.gov.au/Working-with-children/working-with-children-check)
- NSW Premier and Cabinet website <http://www.keepthemsafe.nsw.gov.au>
- Family and Community Services [www.community.nsw.gov.au](http://www.community.nsw.gov.au)

### Church based organisations

- Sydney Anglican Network's Safe Ministry Resources <http://www.psu.anglican.asn.au>
- Safe Ministry Training <http://safeministrytraining.com.au/>
- Safe Ministry (Youthworks) training resources
- National Council of Churches in Australia (NCCA) [www.ncca.org.au](http://www.ncca.org.au)

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<sup>1</sup> Faithfulness in Service 2007

### 3. Safe ministry policy

Lighthouse Church is committed to the physical, emotional and spiritual welfare and safety of all people, particularly within our own community. To ensure the safety of children and vulnerable people in our communities, we will:

- carefully select and screen children's and youth ministry workers
- adopt and encourage safe ministry practices by our ministry workers
- provide appropriate safe ministry training for all children's/youth ministry workers
- ensure a clear reporting procedure is in place, and respond promptly to any concerns or complaints
- provide appropriate support for people in church who has experienced abuse
- provide supervision of, and pastoral accountability (within the context of ministries, locations and activities of the church) for any person (who is a member of a congregation and) who is known to have abused a child or another vulnerable person<sup>2</sup>
- regularly review safe ministry policies and procedures.

A copy of the full policy is available at: <http://www.lighthouse.net.au/wp-content/uploads/2014/08/NLEC-Safe-ministry-policy.pdf>

### 4. Safe ministry responsibilities

#### Senior Pastor

The senior pastor has a legal responsibility to ensure compliance with screening under legislation. While implementation of procedures may be delegated, statutory responsibility cannot be<sup>3</sup>. The senior pastor is responsible for reporting and managing child protection issues, and reports of significant risk of harm or abuse.

#### Safe ministry representatives

Responsible for assisting the senior pastor to implement safe ministry procedures in church including:

- ensure policies and procedures relating to safe ministry are current and updated regularly
- maintain safe ministry register and liaise with leaders regarding screening and training of ministry workers
- provide / gain advice regarding safe ministry queries, issues, policy changes.

#### Children's/youth ministry leaders

Responsible for:

- ensuring all paid and voluntary children's and youth ministry workers are selected and screened in accordance with the procedures outlined in this document before commencing in a 'child related work'
- providing necessary induction and ongoing support to new children's/youth ministry workers
- raising any child protection issues immediately with the safe ministry representative and/or senior pastor in accordance with the procedure outlined in this document
- providing resources eg teaching program resources and support to children's/youth ministry workers.

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<sup>2</sup> Based on Sydney Anglican Network's Safe Ministry Policy <http://www.psu.anglican.asn.au/index.php/p2/policy>

<sup>3</sup> Sydney Anglican Network's Safe Ministry Resources

## Children's/youth workers

Responsible for:

- preparing and delivering lessons in accordance with the teaching program provided and *LC04 Policy and procedure - Serving in Children's and Youth ministry*
- maintaining current WWC clearance, and undertaking safe ministry training every 3 years
- reporting difficulties, concerns, issues or suggestions to the relevant children's/youth ministry leader.

## 5. Selection, screening and training

To ensure the safety of children and vulnerable people in our communities, Lighthouse Church will carefully select, screen and train those involved in children's and youth ministry. These following procedures have been developed with reference to legislative and insurance requirements<sup>4</sup>.

### 5.1 Process for children's and youth ministry workers

#### Selection

Desirable characteristics for a children's/youth ministry worker include someone who:

- has a growing, committed relationship with Christ
- believes children and young people are important to God
- respects and loves children and young people
- models godliness
- is teachable
- is reliable
- is willing and able to work as part of a team
- is open in their actions and behaviour
- is wise and careful.<sup>5</sup>

To provide an opportunity to assess and consider the above characteristics prior to selection, all ministry workers must have attended Lighthouse Church regularly for at least three months, and have completed Lighthouse Church's membership process (which includes approval by Administration Committee) before being selected for ministry.

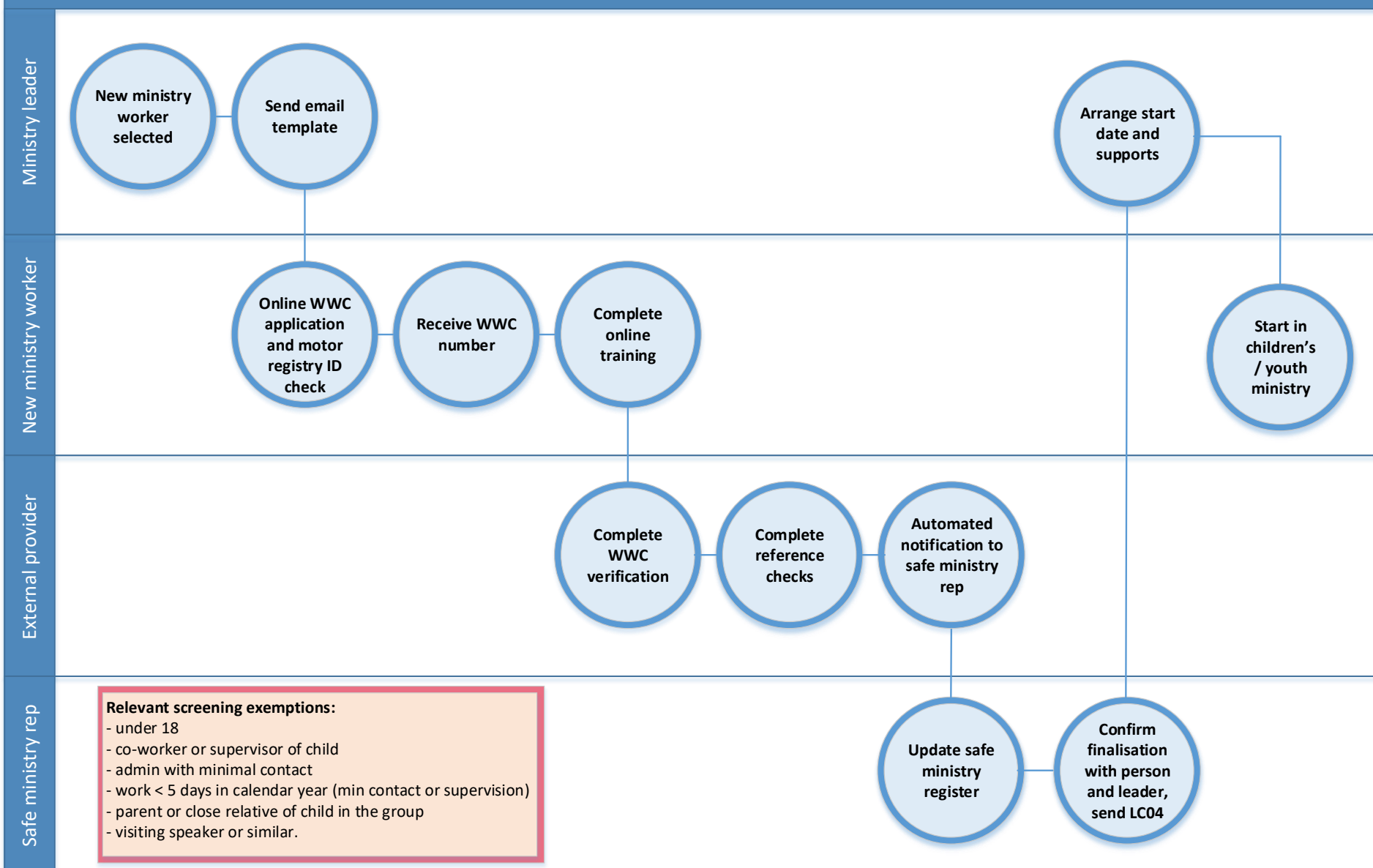
A necessary part of the selection of new ministry workers is to ensure they are willing to complete the necessary screening and training process. For this reason the leader should briefly explain what is required, and confirm the person is willing to complete the process before proceeding further.

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<sup>4</sup> EA/ANSVAR Insurance Policy

<sup>5</sup> Safe ministry (Youthworks) training manual

## Process for new children's and youth ministry workers



## Screening and training



Lighthouse Church will ensure children's/youth ministry workers are screened in accordance with requirements in the *Child Protection (Working with Children) Act 2012* and *Child Protection (Working with Children) Regulation 2013* **BEFORE** commencing in any child related role whether in a paid or volunteer capacity<sup>6</sup>.

The following procedures relate to the diagram above:

### a. Leader sends email template to potential new ministry worker

The email template provides all the necessary instructions to allow the person to work through the screening and training process themselves. If the person does not have email, the template can be printed off and provided as a hard copy. If the person does not have access to a computer, or is not confident to complete the process online, the factsheet referred to in the email provides details of an option for completing the application by phone.

Legislation provides exemptions for some people from screening (see Appendix 2 – Exemptions from Working with Children check). Exemptions most likely to be relevant to Lighthouse Church include:

- under 18 years
- co-worker or supervisor of a child (eg music team if youth are team members)
- admin workers if work does not usually involve contact with children for extended periods (eg Summerfest registration)
- work for a period of not more than a total of 5 working days in a calendar year, if the work involves minimal direct contact with children or is supervised when children are present (eg Summerfest team)
- parent, or close relative, of a child when volunteering in a group, program or activity of which the child is a member or in which the child usually participates (eg parent helpers volunteering in kids church)
- visiting speaker, performer, assessor or other similar visitor if the work of the person at that place is for a one-off occasion and is carried out in the presence of one or more other adults (eg kids program speaker).

If the leader identifies a person is likely to be exempt from the screening process, this should be discussed with the safe ministry leader. Exemptions must be recorded on the safe ministry register.

### b. Person completes screening process

This involves a two part application process:

- completing the application form (online or by phone)
- attending a NSW motor registry or NSW Council Agency.

It is recommended the leader follows up with the person to make sure the process is progressing.

The Working With Children Check obtains applicants' national criminal histories from CrimTrac. Records include:

- convictions (spent or unspent)
- charges (whether heard, unheard or dismissed)
- juvenile records.

The *Child Protection (Working with children) Act 2012* (Schedule 2) lists disqualifying offences that prevent a person working with children. A fact sheet is also available: <http://www.kidsguardian.nsw.gov.au/Working-with-children/Working-With-Children-Check/What-gets-checked>

<sup>6</sup> A breach of this legislative requirements may involve a fine or imprisonment for two years, or both.

Once a person has completed this process they will receive notification by email (or by post if application completed by phone).

The screening process is not complete (and so the person cannot start in child related work) until an online 'employer' verification of their WWC number has been completed. This is conducted by Safe Ministries, our external safe ministry training provider, as part of the safe ministry training process outlined below.

### **c. Complete online safe ministry training**

Lighthouse Church uses an external training provider - Safe Ministries<sup>7</sup> - to provide online safe ministry training for children's/youth ministry workers. The training provider developed the training package in consultation with EA Insurance, our insurer.

The email template sent by the ministry leader includes the necessary information for the person to independently complete online safe ministry training once they have received their WWC number. As part of the training the person is also asked to:

- provide their WWC number - the provider completes the employer verification process on behalf of Lighthouse Church and forwards evidence to the Safe Ministry Representative for record keeping
- provide referee contact details - this information is passed onto Lighthouse Church for completion of reference checks
- indicate whether 'to your knowledge, have you ever been the subject of an allegation (or done anything in the past that could result in an allegation) of abuse, harassment, sexual misconduct, sexual abuse, neglect or violence?'

Cost of training is \$10 per person which can be paid by the training participant online. The email template instructs the person to contact their ministry leader if the cost of training presents a barrier in which case Lighthouse Church will arrange payment. On completion of the training the provider sends an automated email confirmation to the safe ministry representative.

### **d. Outcome and finalisation**

If a screening result is 'cleared' to work in child related work, the safe ministry representative will confirm finalisation of the process by email to the ministry worker and leader (and attach a copy of the LC04 policy and procedure document).

The safe ministry representative updates the child protection register including:

- WWC number and date of birth
- WWC clearance status, date of verification, and date of expiry of current clearance
- date training and reference checks are completed, and date of provision of LC04 document.

If a screening result is 'barred' or 'interim bar' the safe ministry representative will immediately refer the matter to the senior pastor.

If advice of a barred result for an existing ministry worker is received, the person will be immediately suspended from child related work. In this instance the Sydney Diocese of the Anglican Church has advised affiliated churches to 'contact the Director of Professional Standards, Manager of Legal Services or the Commission for Children and Young People directly (phone (02) 9286 7276) for further advice if required'.

By law it is an offence for Lighthouse Church to permit the person to perform child related work in any capacity (paid or volunteer, supervised or unsupervised).

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<sup>7</sup> <http://safeministrytraining.com.au/>

## 5.2 Process for leaders and safe ministry representatives

Children's/youth ministry leaders and safe ministry representatives complete the same screening process and online child protection training, however they may also undertake an extended version of training conducted in a face-to-face training setting every three years. If a person in these roles completes comprehensive child protection training through work (evidenced by completion certificate) this additional face to face training may not be necessary (will be considered on a case by case basis).

Lighthouse Church, through our membership of the Fellowship of Independent Evangelical Churches (FIEC), is a member of the National Council of Churches in Australia (NCCA) safe ministry training agreement (SMTA). This allows our children's/youth leaders and safe ministry representatives to participate in Safe Church workshops run by the various partner churches outlined in the calendar at: [www.ncca.org.au/departments/safe-church-network/scta/scta-workshop-calendar](http://www.ncca.org.au/departments/safe-church-network/scta/scta-workshop-calendar)

Training Partners are SCTA Members who have submitted their training program to be mapped against the national standards for endorsement by SCTA with the intention of offering their training to the wider Christian community. See <http://www.ncca.org.au/departments/safe-church-network/scta/endorsed-training-partners>

The Safe Church contact person for FIEC churches is: Andrew Mitchell, ph: 02 4367 2100, [andrew.mitchell@evchurch.info](mailto:andrew.mitchell@evchurch.info) FIEC also has a relationship with Peter Barnett, Director of Safe Ministry Resources (SMR) and training resources are available if we wanted to provide this training ourselves:

Rev Peter Barnett, Director Safe Ministry Resources  
PO Box 1012 Riverwood NSW 2210  
Mob: 0402102008, Email: [peterb@smr.org.au](mailto:peterb@smr.org.au)

## 5.3 Process for ministry workers teaching Special Religious Education (SRE) in schools

Lighthouse Church is approved by the Department of Education as a provider of SRE or 'scripture' in NSW schools. While the screening process is the same for members authorised by Lighthouse Church to teach SRE, the Department requires annual written confirmation that Lighthouse Church has 'a system of authorised initial and ongoing training for their teachers that includes training in classroom management and child protection issues'. SRE teachers complete the same online safe ministry training in relation to child protection issues, and receive additional training and ongoing instruction in relation to classroom management.

## 5.4 Process for non-Lighthouse Church workers

On occasion Lighthouse Church may have help from children's/youth ministry workers from other churches eg church weekend away, Summerfest. It is expected that these churches will generally employ similar screening and training policies and procedures, however Lighthouse Church must in each instance consider what is necessary to meet legislative screening requirements at a minimum.

In most instances the visiting ministry workers will qualify for an exemption from screening assuming they are not 'working' for Lighthouse Church for a period of more than a total of 5 working days in a calendar year AND the workers are 'supervised'. This would include helpers at the church weekend away, and Summerfest team members. Visiting Summerfest team leaders/supervisors will need to provide a WWC number and employer verification will need to be completed before the event.



## 5.4 Maintaining currency

The Office of the Children's Guardian monitors WWC clearances and will notify any organisation that has verified an individual if their clearance status changes (ie they commit serious sexual and/or violent offences). For more info see the Office of the Children's Guardian range of fact sheets: <http://www.kids.nsw.gov.au/Working-with-children/New-Working-with-Children-Check>

All WWC checks must be updated every 5 years. Safe ministry training must be repeated every 3 years to update knowledge in relation to changes to legislation, practice, and Lighthouse Church policies and procedures. The date due for each ministry worker is recorded in the safe ministry register. The safe ministry representative will monitor due dates and notify ministry leaders (until the register is available to leaders as a shared document).

Lighthouse Church encourages safe ministry practices by setting clear expectations and guidance regarding serving in children's/youth ministry. The procedural document titled *LC04 Policy and procedure – serving in children's and youth ministry* is maintained as a working document. The safe ministry representative is responsible for ensuring content is regularly updated, refined, and expanded to reflect current practices and expectations. As well as on commencement in ministry this document is provided to children's/youth ministry workers every 3 years (when training is updated), and will soon be available to members as a soft copy in a central location.

## 6. Addressing concerns, complaints and allegations

The best protection against any issues in children's/youth ministry is **prevention** and **communication**. Lighthouse Church selection, screening, training and documented procedures (outlined above) aim to prevent situations that may compromise the care of our children or young people or give rise to concerns or complaints relating to care provision.

Children's/youth ministry workers are instructed and trained in what to do if they receive a concern or complaint from parents, carers, or other people involved in church (see *LC04 Policy and procedure – Serving in children's and youth ministry* document). The key message is that they relay the information directly to their ministry leader who will make decisions about how the matter should be managed.

### 6.1 Minor concerns and suggestions for improvement

These concerns or complaints relate to the day-to-day processes or events that are expected in ministry. It may reflect parent or caregiver preferences or expectations, and may provide the opportunity for improvements in our systems and processes. Some of these matters may relate to the safety and wellbeing of children in our care, however they do not involve suggestion of wrongdoing or inappropriate behaviour on behalf of ministry workers or church as a whole, and do not present a risk of significant harm to a child or children.

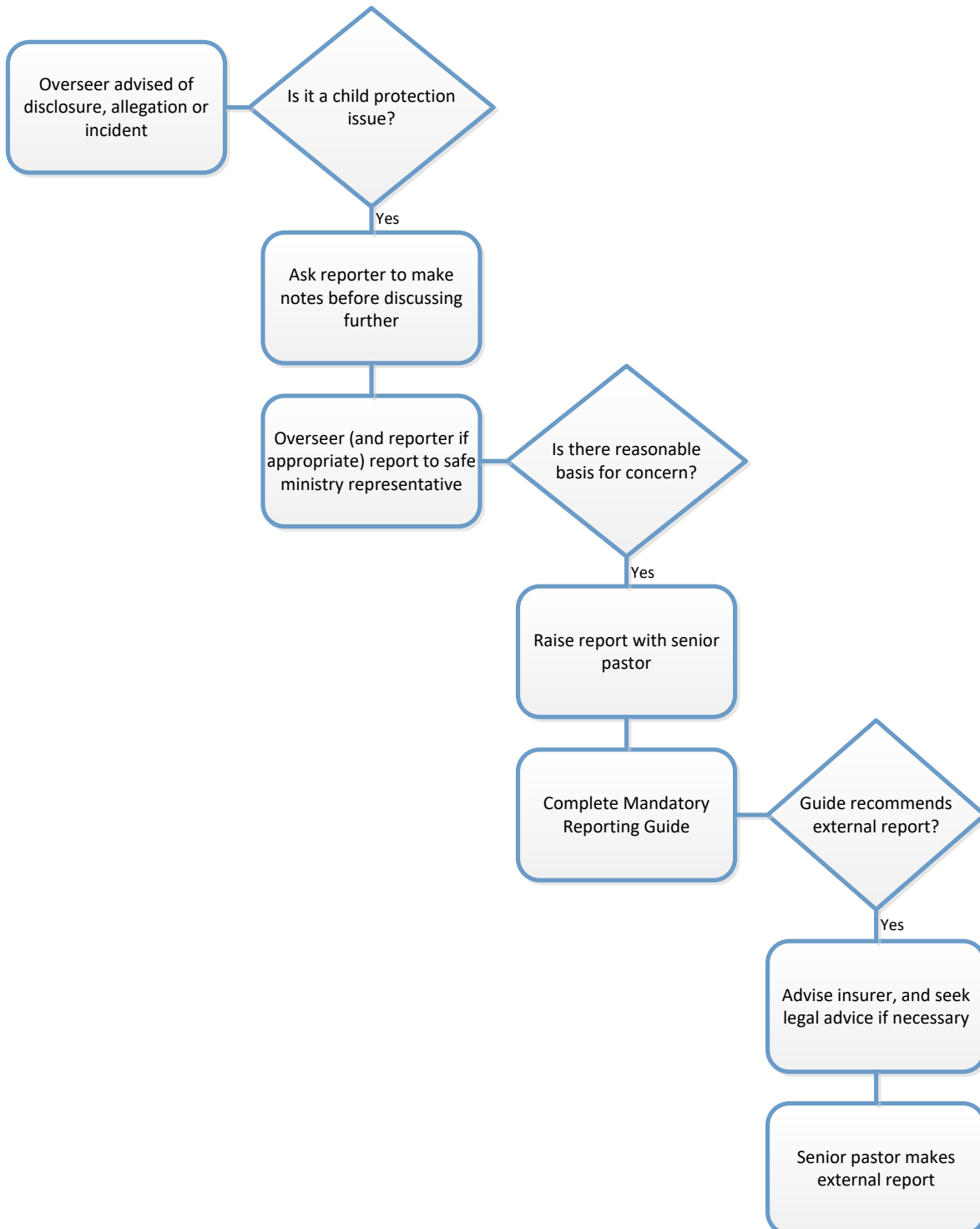
The ministry leader would generally manage these matters directly with those involved. The leader may seek input, support or advice from others (eg senior pastor) in addressing or resolving the situation.

If the leader is unsure whether the complaint warrants escalation, the leader should seek advice from the safe ministry representative.

## 6.2 Allegations of risk of harm and/or abuse

These matters involve 'reasonable grounds' to indicate significant harm to a child and/or abuse and infer wrong doing or inappropriate behaviour. These matters are managed primarily by the senior pastor and safe ministry representative following the process outlined below. A process map of the process is also provided.

### Process for initial management of a child protection matter in church



## Role of ministry worker

### Key message:

Ministry workers report child protection concerns directly to their overseer - they take no further action and do not mention the matter to any other person.

A ministry worker may develop concerns regarding the wellbeing or safety of a child or young person due to:

- indicators observed in physical appearance or behaviour
- a disclosure<sup>8</sup> made by the child or young person
- a witnessed incident
- an allegation<sup>9</sup> raised by another person.

The document *LC04 Policy and procedures – serving in children's and youth ministry* advises ministry workers what to do when such situations arise. The general concept is that the ministry worker is to report any concerns, complaints, issues, disclosures or allegations immediately to their ministry leader.

A ministry worker should not make judgements about the seriousness of a matter, or what action should be taken. This is the case even if the ministry worker's professional background places them in the role of mandatory reporter. In the course of performing 'work' for Lighthouse Church, the ministry worker is a volunteer. The senior pastor (paid staff in authority) is responsible for determining appropriate action in line with legislative requirements, professional recommendations and church policies and procedures.

## Role of the ministry leader

### Key message:

Ministry leaders immediately escalate child protection matters to the safe ministry representative (or senior pastor) - they take no further action, do not make any promises, and do not notify or discuss the matter with anyone else.

If a ministry worker raises a concern based on a disclosure from a child or another person about a child protection matter, the leader should first encourage the worker to write the information down (if the situation permits).

Following discussion with the ministry worker, the leader will decide whether to escalate the matter to the safe ministry representative and/or senior pastor. If the leader has concerns a child or young person is 'at risk of significant harm' the matter should be escalated to the safe ministry representative if available, otherwise directly with the senior pastor.

A child should not be detained by a ministry worker or leader, even if the child has disclosed information that raises very serious concerns relating to parents or carers. The leader should not raise or discuss a child protection matter with parents or carers. It is extremely important the formal process for reporting is followed as outlined in the process map above.

<sup>8</sup> In this instance a disclosure is where a child or young person 'discloses' or 'reveals' information to a children's/youth ministry worker that causes concern for their safety, welfare or wellbeing.

<sup>9</sup> An allegation is where a person 'declares', 'states', or 'asserts without proof' that harm has occurred (or may occur) to a child or young person.

## Process for safe ministry representative and senior pastor

### Consider the information



While every matter involving concern about the wellbeing of a child or youth will be considered and investigated if appropriate, the initial focus will be determining if there is an obligation to make an external report by following the process outlined below.

The senior pastor and safe ministry representative will work through the process below. If the safe ministry representative is not available the senior pastor may choose to complete this process with the ministry leader or another pastor to avoid delays. The process should be undertaken by two people who are considered impartial.

- A. Is there 'reasonable grounds' to indicate the child is at risk of 'significant harm' or has been subject to 'abuse'?

#### Reasonable grounds

'Reasonable grounds' means your concerns are well founded and based on information you **know**, or have received from a reliable source. A useful consideration is whether another person, when presented with similar information, would draw the same conclusion.

#### Significant risk of harm

'Significant risk of harm' is the new statutory threshold for reporting. A child or young person is at risk of significant harm if the circumstances that are causing concern for the safety, welfare or well-being of the child or young person are present to a 'significant' extent.

NSW government's agreed policy definition of significant harm:

- that which is sufficiently serious to warrant response by a statutory authority, irrespective of a family's consent
- what is significant is not minor or trivial, and may reasonably be expected to produce a substantial and demonstrably adverse impact on the child's or young person's safety, welfare, or wellbeing
- significance can result from a single act or omission or an accumulation of these.

[http://www.keepthemsafe.nsw.gov.au/v1/reporting\\_children\\_at\\_risk/significant\\_harm\\_policy\\_definition](http://www.keepthemsafe.nsw.gov.au/v1/reporting_children_at_risk/significant_harm_policy_definition)

#### Child abuse

Any act that endangers or impairs a child's physical or emotional health and development. This includes conduct in relation to a child which is bullying, emotional abuse, harassment, neglect, physical abuse, spiritual abuse or any sexual behaviour with or in the presence of a child including sexual communications and gestures, showing sexually explicit or suggestive material and sexual physical contact.

A one-off indicator is rarely sufficient to establish abuse or risk of harm. Usually there will be a number of signs observed over a period of time. It is important when forming suspicions of abuse or risk of harm not to jump to conclusions too quickly, however when reasonable grounds exist for suspecting abuse or risk of harm, action should be taken<sup>10</sup>. To make a report to community services you don't have to be certain - you only need to make sure your concerns are current, well founded and based on information you know or have from a reliable source.

<sup>10</sup> Anglican Youthworks training material

B. Does the concern or matter meet the definition of 'reportable conduct'?

**Reportable conduct**

Under the Ombudsman Act 1974 section 25A(1) 'reportable conduct' refers to the following:

- any sexual offence or sexual misconduct committed against, with or in the presence of a child
- any assault, ill treatment or neglect of a child
- any behaviour that causes psychological harm to a child, regardless if this is with the consent of the child.

Reportable conduct does not extend to the following:

- conduct that is reasonable for the purposes of the discipline, management or care of children, having regard to the age, maturity, health or other characteristics of the children
- use of physical force that, in all the circumstances, is trivial or negligible

Examples of conduct that would not constitute reportable conduct include touching a child to attract their attention, to guide a child or to comfort a distressed child, a school teacher raising his or her voice in order to attract attention or to restore order in the classroom, and conduct that is established to be accidental.

<http://sdm.community.nsw.gov.au/mrg/definition/def.html>

Further information about what meets the definition of 'reportable conduct' is available in the factsheet: [http://www.ombo.nsw.gov.au/data/assets/pdf\\_file/0013/5620/PU\\_CP\\_02\\_11\\_Reportable\\_Conduct\\_v3.pdf](http://www.ombo.nsw.gov.au/data/assets/pdf_file/0013/5620/PU_CP_02_11_Reportable_Conduct_v3.pdf) however if in doubt, assume the matter is reportable conduct.

C. Is the concern raised against a person in church, and if so is this person in a position of leadership?

The legislative requirement for mandatory reporters (for organisations other than 'designated agencies') to make an external report relates only to allegations and convictions that arise in the course of a worker's 'work' (including volunteer work) for Lighthouse Church. This does not however prevent a report being made relating to concerns relating to other contexts.

If a ministry worker authorised to teach school-based ministry advises their leader/senior pastor they believe a child or young person they teach at school is at risk of harm the senior pastor should inform the school Principal. In this instance the Principal has the overall responsibility for determining whether an external report is required.

D. Does the concern relate to a child, or to a young person?

Mandatory reporting is required by law for children under 16 years of age who you suspect to be at risk of significant harm (Act Section 27(3)). A child is defined as a person 0-15 years.

Mandatory reporting for young people (16-17 years) is not required by legislation. You **may** report young people (16-17 years) you suspect to be at risk of significant harm (Section 24). In this instance Lighthouse Church would consider the circumstances and seek further advice. If the matter relates to a young person being homeless, you **MUST** receive their permission before making an external report.

## Completing the mandatory reporting tool

In most instances where a concern has escalated to the point of consideration by the senior pastor, the mandatory reporting tool should be completed to demonstrate appropriate consideration and decision making. The tool is located here:

[http://www.keepthemsafe.nsw.gov.au/v1/reporting\\_children\\_at\\_risk/mandatory\\_reporter\\_guide](http://www.keepthemsafe.nsw.gov.au/v1/reporting_children_at_risk/mandatory_reporter_guide)

The tool is designed to guide decision making and provide a recommendation in the form of a report as which advises:

- whether the concern meets the statutory threshold for reporting risk of significant harm ie should be reported
- which external authorities should be notified, by which method, and the relevant contact details.

The Guide 'is intended to complement rather than replace critical thinking and does not prohibit a mandatory reporter from any course of action he/she believes is appropriate ... if your concern does not fit any of the decision trees, it is probably not reportable'<sup>11</sup>.

Where possible the senior pastor and safe ministry representative would be involved in completing the report either jointly, or separately with discussion to ensure the same conclusion was reached. In all cases the final report generated by the Guide should be retained on file as evidence of decision making, to facilitate external reporting (if indicated), and assist in reporting back to ministry leaders (where indicated).

## Notify insurer

In instances where the Mandatory Reporting Guide confirms an external report is required, and the concern or allegation involves any suggestion of wrongdoing or oversight by a person in their role at church or by church as a whole, the senior pastor will advise Lighthouse Church's insurer and provide a copy of the mandatory reporting tool report:

EA Insurance (an 'authorised representative' for Ansvar insurance)

Policy number: 03.025.0553393

email: [jpaas@ea.org.au](mailto:jpaas@ea.org.au) phone: (03) 9890 6851.

Advice, instructions and action recommended by the insurer is to be documented and acted upon by the senior pastor as soon as possible.

## Gain professional advice

The senior pastor may choose to seek additional advice before proceeding to make an external report providing this does not significantly delay further action. This may include:

- Anglican Church Diocese of Sydney Professional Standards Unit (PSU)  
As an affiliated church we can contact PSU Director (02) 9265 1514 or [psu@sydney.anglican.asn.au](mailto:psu@sydney.anglican.asn.au)
- FIEC recommendation in correspondence dated May 2014  
If you require legal advice with respect to child protection and abuse matters we would suggest you consider Prolegis lawyers: [www.prolegis.com.au](http://www.prolegis.com.au) Philip Gerber has recently joined the team. Philip has broad experience in many fields of law and a particular speciality in professional standards and child protection matters, and in managing significant investigations/complaints. He spent many years heading up the Professional Standards unit of Sydney Diocese.

<sup>11</sup> <http://sdm.community.nsw.gov.au/mrg/app/summary.page>

## **Making an external report**

The senior pastor will make an external report as soon as possible if indicated by the Mandatory Reporting Tool recommendations as required under section 27 of the Act by phoning the Child Protection Helpline on 13 36 27. This is a 24 hours a day, 7 days a week call centre staffed by professionally qualified caseworkers to receive and screen reports.

### **6.3 Action following a significant allegation**

The senior pastor will determine and implement action to be undertaken in the following situations:

- where an external report has been made
- where an external report was considered but was not made due to the statutory threshold of 'significant harm', but it is agreed that further action internally by Lighthouse Church is necessary.

As a priority the senior pastor will take necessary steps to ensure the safety of children and young people at Lighthouse Church. This will involve undertaking a formal risk assessment relevant to the situation, and the prompt development and implementation of an appropriate action plan.

If allegation has been made against a Lighthouse Church ministry worker it is likely that action will include:

- stepping down from children's/youth ministry and other leadership roles - this must occur as a matter of course until the matter is investigated - even if there is evidence the accusation is false, vexatious or misconceived.
- an independent investigation - external advice will be sought and where necessary this will involve investigation by a person external to Lighthouse Church and is appropriately qualified and experienced. The investigator will liaise with authorities (if involved) and prepare and present a report to church.

## **Support**

The senior pastor will determine what support is necessary in consultation with our insurer, relevant professionals, Safe Ministries, FIEC and the Board of Reference.

The child or young person (and possibly family and friends) may require immediate specialist counselling or other support. The person who raised the allegation may also require support. The pastoral team will decide how to provide sustainable ongoing contact, support, and updates on how the management process (and prosecution process where relevant) is progressing. It is important that limitations are acknowledged and that there is an understanding of when it may be more appropriate to provide external support<sup>12</sup>.

It is also necessary to deal fairly and provide support to the person against whom the allegation has been made assuming they are a member or regular attendee of Lighthouse Church. This support will need to be distinctly separate to the support provided to the person who raised the allegation and the child/young person and their family<sup>13</sup>. A clear protocol regarding confidentiality with reference to relevant legislation will be established in each case.

<sup>12</sup> Disclosure of risk by a child/young person guidelines <http://www.psu.anglican.asn.au/index.php/p2/youthworks>

<sup>13</sup> Checklist - Dealing with child abuse allegations <http://www.psu.anglican.asn.au/index.php/p2/checklist>

## 7. Known offender or 'person of suspicion'

In any situation where it is suspected or becomes known that a person attending Lighthouse Church is a prohibited person, a person of interest, or a person who has been accused or suspected of child abuse even if not convicted (see Appendix 3 – Definitions and indicators of abuse), Lighthouse Church will implement the Sydney Anglican Network's Guidelines for parishes regarding sexual and child abuse offenders and persons of suspicion<sup>14</sup>.

A summary of the Guidelines has been produced to facilitate understanding and implementation. The Guidelines also provide template for the development of a Memorandum of Understanding which is completed in collaboration with the person of interest. This Memorandum is to be completed for all suspected or known persons of interest who wish to be involved in **any** Lighthouse Church' event or activity.

The Guidelines provide information regarding:

- a. Identifying offenders and persons of suspicion
  - sources of information
  - investigating and verifying information
- b. Action required on confirmation of information
  - assessment of risk - complete a formal risk assessment (for new significant realized/actual issues or risk this should be in consultation with Sydney Anglican Network's PSU and where indicated legal advice)
  - appoint mentor/s
  - develop an action plan and memorandum of understanding outlining risk management strategies (restrictions, supervision and accountability, signed consent to release information to those who 'need to know', internal and external support, outcome of 'out of plan' behaviour, reporting/recording/review arrangements)
  - implement the action plan
  - review of supervision and support
  - inter-agency cooperation where indicated.

The Anglican Safe Ministry material recommends consulting with the Director of their Professional Standards Unit as to whether a risk assessment is required before appointing someone who has:

- been acquitted of a charge of an offence against a child;
- had a charge of an offence against a child not proceed;
- had a prohibited status under applicable child protection legislation lifted; or
- been the subject of church disciplinary proceedings involving child abuse.

For further detail review the Anglican Safe ministry material: <http://www.psu.anglican.asn.au>

See Appendix 4 for further information relating to the requirements of our insurance policy in relation to known offenders.

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<sup>14</sup> Guidelines for parishes regarding sexual and child abuse offenders and persons of suspicion  
<http://www.psu.anglican.asn.au/index.php/p2/guidelines>



## 8. Record keeping

### Records retained

#### a. Safe ministry register

This spreadsheet is maintained by the Safe Ministry Representative and includes the following information for every person involved in children's/youth ministry the register includes:

- name and date of birth
- WWC number, date and outcome of components of screening process
- date of completion of safe ministry training
- due dates for screening and training.

#### b. Personal contact information and ministry groups

- Maintained via the Hub (database)

#### c. Records relating to concerns, issues, allegations

- Records relating to suggestions, and non-reportable concerns, issues or complaints received or raised by parents, carers, members or other attendees of Lighthouse Church will be retained.
- Comprehensive records of all allegations and actions including dates of relevant conversations, conclusions reached, and action taken will be maintained. This information may be subpoenaed and used in a court of law.

#### d. Other documentation

- Attendance rolls, permission forms, incident report forms will be retained.

#### e. Policies and procedures

- Safe ministry policies and procedures are updated to reflect changes and improvements in practice. This may happen whenever at any time, however a formal review will be undertaken at least once annually.

#### f. Annual report to Administration Committee

- A report relating to the requirements of this policy and procedure document will be included in the annual safe ministry report presented to the Administration Committee by the Safe Ministry Representative.

Efforts will be made to store all records, both hard copy and electronic, securely.

## 9. Related policy and procedures

- LC01 Policy and procedure - privacy and information management
- LC04 Policy and procedure - serving in children's and youth ministry
- LC07 Policy and procedure - work health and safety
- LC08 Policy and procedure – managing concerns and conflict in church (in draft).

## Appendix 1



### SAFE MINISTRY TRAINING

We are pleased to have you join us in children's/youth ministry at Lighthouse Church where we have a wonderful opportunity to teach our young people about Christ.

There are a few things that need to happen before you start that are required by law or for insurance purposes for anyone working with children. This preparation process is designed to ensure the safety and welfare of our children, young people and ministry workers.

The following provides all the information you need to get started. If you are under 18 years, or you already have a WWC number, you won't need to complete Step 1 and 2.

#### Step 1 - Working with children application

The application is completed online. Go to <https://wwccheck.ccyp.nsw.gov.au/applicants/application>

Make sure you fill in your details exactly as they are listed on your chosen form of identification. Select 'volunteer' clearance (no fee involved), and 'religious services' as the sector in which you 'work'.

On completion of the application form you will be issued with an application number. You will need this number before completing Step 3 below. If you already have a WWC clearance, skip step 1 and 2 - go straight to Step 3 below. You will need to enter your existing WWC clearance number (which will look something like WWC0xxxxxV) in Step 3.

#### Step 2 - Visit a NSW Government Service Centre

Take your application and identification to a NSW Government Service Centre to verify your identity.

#### Step 3 - Safe ministry training

This short online training course provides information about expectations of children's/youth ministry workers, and how to respond to concerns about safety and welfare of children and young people.

To complete the training process you will need:

- your WWC number (from Step 1)
- contact details for two referees who can confirm your suitability to work with children/youth
- to pay a \$10 fee for the course by credit card (talk with your ministry leader if this is a problem)
- to read the document *LC04 Policy and procedure - serving in children's and youth ministry* (the link to this document will be provided in during the online training).

To do the training go to: <http://online.safeministrytraining.com.au/origtraining/Training.php?oid=579f5574955f7>

#### Step 4 - Finalisation

The training provider will let us know when you have completed the training. They will forward your WWC number and referee contact information. Once you have completed this process you are ready to serve in children's/youth ministry.

We know this is a bit of process, so if you have any questions or have difficulties at any point please contact your ministry overseer or email [admin@lighthouse.net.au](mailto:admin@lighthouse.net.au)

The steps above allow you to serve in any children's/youth ministry at church for the next three years.

## Appendix 2 – Exemptions from Working with Children check

### Child Protection (Working with Children) Regulation 2013

#### Clause 20 Exemption from Act for specified workers and employers

- (1) The following workers engaged in child-related work (and employers of those workers in that capacity) are exempt from the Act (other than section 7 of the Act):
- (a) a worker who provides administrative, clerical or maintenance services, or other ancillary services, if the work does not ordinarily involve contact with children for extended periods,
  - (b) a worker who works for a period of not more than a total of 5 working days in a calendar year, if the work involves minimal direct contact with children or is supervised when children are present,
  - (c) a worker who carries out the work in the course of an informal domestic arrangement that is not carried out on a professional or commercial basis,
  - (d) a worker whose work involves direct contact only with children who are close relatives of the worker, other than a worker who carries out the work in the capacity of an authorised carer,
  - (e) a parent, or close relative, of a child who attends a school, an education and care service or other educational institution when volunteering at or for activities of the school, service or institution,
  - (f) a parent, or close relative, of a child when volunteering in connection with a team, program or other activity of which the child is a member or in which the child usually participates,
  - (g) a worker who is under 18 years
  - (h) a police officer or a member of Australian Federal Police when working in his or her capacity as a police officer
  - (i) a worker who is a health practitioner in private practice, if provision of services by the practitioner in the course of that practice does not ordinarily involve treatment of children without one or more other adults present,
  - (j) a worker who is a co-worker of a child or who is a work supervisor or work placement supervisor of a child (other than as referred to in clause 12 (2)) - community Justice placements.
  - (k) a home care worker who holds a police certificate that is current for the purposes of the Accountability Principles 1998 made under the Aged Care Act 1997 of the Commonwealth, if the work is home care work and the clients are not primarily children,
  - (l) a health practitioner who is working in and visiting New South Wales from outside the State, if the period of work does not exceed a total of 5 days in any period of 3 months,
  - (m) a worker who is working in and visiting New South Wales from outside the State for the purposes of a one-off event such as a jamboree, sporting or religious event or tour, if the event is the only child-related work carried out by the worker in New South Wales in that calendar year and the period of the work does not exceed 30 days,
  - (n) a worker who is working in and visiting New South Wales from outside the State for the purposes of child-related work (other than a worker referred to in paragraph (l) or (m)), if the worker is the holder of an interstate working with children check in the jurisdiction in which the person ordinarily resides, or is exempt from the requirement to have such a check in that jurisdiction, and the period of the child-related work in New South Wales does not exceed a total of 30 days in any calendar year,
  - (o) a visiting speaker, adjudicator, performer, assessor or other similar visitor at a school or other place where child-related work is carried out if the work of the person at that place is for a one-off occasion and is carried out in the presence of one or more other adults.
- (2) Subclause (1) (e) and (f) do not apply to a parent or close relative, if the volunteering involves any of the following:
- (a) providing personal care services to children with disabilities, being services that involve intimate contact with those children, such as assistance with toileting, bathing or dressing,
  - (b) providing mentoring services as part of a formal mentoring program provided by a government or non-government agency.

(3) In this clause:

**holder of an interstate working with children check** means a person who has undergone interstate child-related work screening under a law of another jurisdiction in which the person ordinarily resides and who is permitted by that law to carry out child-related work.

**interstate child-related work screening** has the same meaning as in section 34 of the Act.

**How is the exemption for parents volunteering with their children applied?**

Parents volunteering at their child's school can assist in a volunteer capacity with any activity in that school (even if for example their child is in year 2 and they want to help with reading in a year 5 class). For other activities the parent can volunteer for activities in the group in which their child is involved only (eg can coach under 7's team in which their child plays but can't coach under 10's if their child is not in that team). For Kids Church activities a parent can assist with the class their child is in but not with other classes unless they have a check.

**Find out more:** <http://www.kids.nsw.gov.au/kids/working/newcheck> **NSW Commission for Children and Young People**

### Appendix 3 - Definitions and indicators of child abuse

<p><b>Child or children</b></p> <p>The <i>Child Protection (Working with Children) Act 2012</i> defines children as persons under the age of 18 years. A person who is 16 or 17 years of age may be referred to as a young person or youth.</p>
<p><b>Child abuse</b></p> <p>Any act of omission or commission that endangers or impairs a child's physical or emotional health and development. This includes conduct in relation to a child which is bullying, emotional abuse, harassment, neglect, physical abuse, spiritual abuse or any sexual behaviour with or in the presence of a child including sexual communications and gestures, showing sexually explicit or suggestive material and sexual physical contact.</p>
<p><b>Child related work</b></p> <p>Under the Child Protection (Working with Children) Act 2012 a worker [employee or volunteer] is engaged in child related work <b>if the work</b> involves <b>direct</b> contact with children or is in a child related role which under the Act includes work for, or in connection with, religious services by any religious organisation. Under the Act <b>direct</b> contact with children means physical contact, or face to face contact in the line of <b>work</b> (ie church attendees are not performing work, ministry workers are performing 'work' on behalf of Lighthouse Church).</p>
<p><b>Conviction</b></p> <p>Under the Act a conviction includes a finding that the charge for an offence is proven, or that a person is guilty of an offence, even though the court does not proceed to a conviction.</p> <p>Those offences included on a person's criminal record which, because of the passage of time and legislative preconditions having been met, are no longer to be considered in any administrative decision making. Sexual offences and child-related personal violence offences can never be "spent" for the purposes of the Working With Children Check.</p>
<p><b>Child neglect</b></p> <p>Child neglect occurs where a child is harmed by failure to provide the basic physical and emotional necessities of life such as adequate and proper food, nursing, clothing, medical aid or lodging. Neglect can be ongoing or a single significant incident. However, neglect typically develops as a pattern of behaviour that results in harm to a child over a period of time. When considering whether a child is being, or has been, neglected, it may be useful to focus on the effect on the child. Incidents that do not suggest any impact on the long-term physical, emotional or intellectual well-being of the child are unlikely to constitute neglect.</p> <p>Indicators can include:</p> <ul style="list-style-type: none"> <li>• hunger, begging or stealing food, gorging when food is available</li> <li>• consistently poor hygiene and/or inappropriately dressed for weather conditions</li> <li>• unattended health problems and lack of routine medical care eg gum disease, untreated sores</li> <li>• tired, listless, falling asleep in class</li> <li>• behaviours such as tiredness, irritability, inability to concentrate</li> <li>• evasive in discussions about home, address, when parents are home</li> <li>• withdrawn, alienation from peers, poor socialising habits</li> <li>• poor or irregular school attendance or staying at school long hours.</li> </ul>
<p><b>Domestic violence</b></p> <p>Domestic violence is violent, abusive and intimidatory behaviour by one person against another in a personal, intimate relationship. Domestic violence occurs between two people where one has power over the other causing fear and physical and/or psychological harm.</p>
<p><b>Emotional abuse</b></p> <p>Encompasses a range of behaviours by a parent or caregiver which can destroy the confidence of a child, resulting in significant emotional deprivation or trauma. It involves impairment of a child's social, emotional, cognitive and intellectual development and/or disturbance of a child's behaviour. Indicators can include:</p> <ul style="list-style-type: none"> <li>• low self-esteem</li> <li>• Fear of failure, overly high standards, excessive neatness or cleanliness, anxiety</li> <li>• behavioural problems – unexplained mood swings, unusually demanding behaviour or overly compliant, passive behaviour, behaviours that are not age appropriate ie overly infantile or parenting behaviours, attention seeking behaviour</li> </ul>

<ul style="list-style-type: none"> <li>• delays in emotional and/or physical development</li> <li>• unconcerned parents and/or very limiting in terms of contact with other children.</li> </ul>
<p><b>Person of interest (POI)</b></p> <p>A person who has been convicted, accused, is reasonably suspected of, or has admitted to child abuse or sexual offences.</p>
<p><b>Physical abuse</b></p> <p>Physical abuse refers to non-accidental injury to a child by a parent, caregiver or another person responsible for the child. It includes injuries that are caused by excessive discipline, severe beatings or shakings, bruising, lacerations or welts, burns, fractures or dislocation.</p> <p>Indicators can include:</p> <ul style="list-style-type: none"> <li>• injuries without a plausible explanation, bruises, welts or burns in unusual configurations, fractures</li> <li>• multiple injuries in varying stages of healing</li> <li>• evasive answers, improbable explanations</li> <li>• unusual fear of physical contact eg flinching, wariness or fear of parent/caregiver, reluctance to go home</li> <li>• habitual absences from school or other regular activities</li> <li>• aggressive, withdrawn or sad eg frequent crying.</li> </ul> <p>From online mandatory reporting guide: While corporal punishment is not endorsed, it is not prohibited as long as physical force is not applied to any part of the head or neck of a child, or any other part of the body of a child in such a way as to be likely to cause harm to the child that lasts for more than a short period. (Crimes Act 1900 s 61AA; Education Act 1990)</p>
<p><b>Prohibited person</b></p> <p>A person convicted of a serious sex offence, the murder of a child, a child-related personal violence offence or a person who has been found guilty of a registerable offence against children under the Child Protection (Offenders Registration) Act 2000.</p>
<p><b>Registrable person</b></p> <p>A person who has been found guilty of a registrable offence against children under the Child Protection (Offenders Registration) Act 2000.</p>
<p><b>Relevant record</b></p> <p>Relevant records include Relevant criminal records, Relevant Apprehended Violence Orders and Relevant employment proceedings.</p>
<p><b>Sexual abuse</b></p> <p>Child sexual abuse is any sexual act or sexual threat imposed on a child. Adults or adolescents who perpetrate child sexual abuse exploit the dependency and immaturity of children. Coercion, which may be physical or psychological, is intrinsic to sexual abuse and differentiates such abuse from consensual peer sexual activity.</p> <p>The sexual abuse of a child commonly has the following characteristics:</p> <ul style="list-style-type: none"> <li>• usually starts with something minor and gradually builds to more involved behaviours through 'grooming'</li> <li>• secretive and generally known only to the abuser and victim making it extremely difficult to detect;</li> <li>• perpetrated by someone known to the child and/or held in a position of trust by the child or their parents</li> <li>• rarely a one-off incident but part of an ongoing relationship that is corrupting and distorting.</li> </ul> <p>Indicators can include:</p> <ul style="list-style-type: none"> <li>• inappropriate sexual activity and/or sexual knowledge beyond their years</li> <li>• unusual fear and anxiety</li> <li>• deteriorating relationships with peers and adults</li> <li>• sudden decline in performance at school</li> <li>• avoiding going home or to another venue they previously enjoyed visiting</li> <li>• evidence of grooming eg unexplained gifts</li> <li>• injury, discomfort in the genital areas, inflammation or recurrent infections eg urinary tract infections.</li> </ul> <p>Sexual abuse is often preceded by grooming. The grooming process is a <b>pattern</b> of behaviour that can include:</p> <ul style="list-style-type: none"> <li>• persuading a child that a 'special' relationship exists – spending special time with the child, establishing a relationship outside the employment/ministry context, giving gifts, showing special favours to them only,</li> </ul>

allowing the child to overstep rules etc  
testing of boundaries – undressing in front of the child, allowing the child to sit on the lap, talking about sex, ‘accidental’ inappropriate touching.

#### **Serious sex offence**

An offence, involving:

- sexual activity or acts of indecency committed in NSW and was punishable by penal servitude or imprisonment for 12 months or more; or
- an offence, involving sexual activity or acts of indecency, committed elsewhere that would have been an offence punishable by penal servitude or imprisonment for 12 months or more, if committed in NSW; or
- an offence under section 800 or 80E (sexual servitude) of the Crimes Act 1900, committed against a child: or
- an offence under Sections 910-91 G (child prostitution, other than if committed by a child prostitute) of the Crimes Act 1900 or a similar offence under a law other than a law of New South Wales; or
- an offence under Section 91 H, 578B or 578C (2A) (child pornography) of the Crimes Act 1900 or a similar offence under a law other than a law of NSW; or
- offence of attempting, or of conspiracy or incitement, to commit an offence referred to above;
- any other offence, whether under the law of New South Wales or elsewhere, prescribed by the regulations.

Offences that are no longer offences in New South Wales are not included. Offences involving sexual activity or an act of indecency are excluded if the conduct constituting the offence occurred in a public place and would not have constituted an offence in New South Wales if the place were not a public place. Sexual offences include sexual assault, the involvement of children in sexual acts or acts of indecency and any sexual threat imposed on a child. Sexual assault refers to sexual intercourse by a person with a child.

#### **Spiritual abuse**

Spiritual abuse occurs when a person is mistreated by actions or threats when justified by appeal to God, faith or religion. It includes the use of a position of spiritual authority to dominate or manipulate another person or group, isolation from friends and family members, claims for inappropriate deference to a person with spiritual authority, and the use of Christian terminology to justify abuse.

Indicators can include:

- low self-esteem
- anxiety and fear
- excessive deference to a leader

isolation from friends and family.

## Appendix 4 - EA / Ansvar Insurance requirements

Lighthouse Church's sexual abuse/molestation insurance policy has the following exclusion clause:

### KNOWN OFFENDERS MOLESTATION/SEXUAL ABUSE EXCLUSION

This policy does not cover the legal liability of the Insured to pay damages or compensation to any third party, or legal costs associated with any claim, in respect of an injury sustained by a third party in circumstances where;

(a) that injury arises either directly or indirectly from sexual abuse; AND

(b) the perpetrator of the sexual abuse was a representative, member, employee, or service provider of the insured;

AND

(c) the insured knew or ought reasonably to have known that the perpetrator of the sexual abuse had previously:

(i) committed sexual abuse; and/or

(ii) been convicted of sexual abuse; and/or

(iii) whilst being a representative, member, employee, or service provider of the insured; had been the subject of a prior complaint in respect of a sexual abuse, which has not been appropriately investigated.

The following requirements are included in our insurance policy as guidelines to ensure our insurance coverage:

When engaging or appointing **new** employees, representatives, members or service providers [ie to positions of leadership or trust] ensure you have:

- a. inquired with two referees as to their suitability for the role or position (for 'non volunteers')
- b. inquired with their previous posting or employment as to their suitability for the role/position
- c. inquired of them whether they have ever been convicted or investigated for sexual abuse, assault or a sexual offence of any kind
- d. asked them to sign an authority allowing you to conduct a search to determine whether they have a criminal record, and have conducted this search
- e. Not placed known volunteers in a position of trust within their first six months of joining your organisation
- f. The two-person rule in place at all times.

With **existing** employees, representatives, members or service providers, ensure you:

- i. investigate fully any complaint regarding any alleged sexual abuse, assault or offence
- ii. if appropriate, remove that person from their role or position.

The following email is a copy of communication with EA Insurance in order to clarify our responsibilities in relation to the above guidelines with reference to the insurance exclusion policy:

From: Robyn Withers Sent: Thursday, 26 June 2014 1:04 PM

To: Jean Paas Cc: Connan O'Shea

Subject: RE: Lighthouse Church insurance - sexual abuse/molestation cover

Hi Jean,

Thank you for your assistance today. Following on from our conversation Neal also confirmed:

1. The guidelines in the policy are just 'guidelines' – not explicit 'requirements'
2. The term 'members' in the exclusion policy is not used in reference to 'members of the association' – but has a vaguer, potentially broader meaning
3. EA had NOT advised, and not does expect, 'all leaders in church' to go through the safe ministry screening (and training) process that legislatively is required for all involved in 'child related work' (and their supervisors).



Thanks again for your helpful and clear assistance in this matter.

Regards,  
Robyn Withers, Secretary - Lighthouse Church

From: Robyn Withers [mailto:robyn.withers@digitalwelcomemat.com]  
Sent: Wednesday, 25 June 2014 8:42 PM  
To: Connan O'Shea  
Cc: Jean Paas  
Subject: Lighthouse Church insurance - sexual abuse/molestation cover

Hi Jean,

We are in the process of reviewing our safe ministry policy, systems and procedures again. I would like to phone to find out more about our safe ministry insurance requirements, how these fit with our existing policy and procedure and the changes to our system we are considering. Specifically, with reference to the sexual abuse/molestation exclusion clause in our policy I would like to ask about:

When engaging or appointing new employees, representatives, members or service providers ensure you have:

- a. inquired with two referees as to their suitability for the role or position (for 'non volunteers') - this is just for paid staff?
- b. inquired with their previous posting or employment as to their suitability for the role/position - is this for any leader or just paid staff and child related work? This exceeds the legislative requirement relating to child related work.
- c. inquired of them whether they have ever been convicted or investigated for sexual abuse, assault or a sexual offence of any kind
- d. asked them to sign an authority allowing you to conduct a search to determine whether they have a criminal record, and have conducted this search - this would have changed with the introduction of the new working with children check? Presumably this check and verification is sufficient to meet this requirement?
- e. Not placed known volunteers in a position of trust within their first six months of joining your organisation - is this a fixed time period? Our process is currently 3 months, then membership process, then serving. I assume this must have been OK as we sent our policy and procedures to you in 2013?
- f. The two-person rule in place at all times – assume this is for child related work only? If for 'employees, representatives, members or service providers' would like to get more info on this requirement.

Our legislation requirements generally relate only to child related work. I would like to understand based on the above whether our insurance requirements go beyond that, and if so does this specifically mean we are being asked to screen and train anyone in our organisation that holds a position of trust (leadership position) to reduce the risk of non-coverage as a result of this exclusion clause? This question is critical to our considerations about changing our safe ministry systems.

If you think this can be answered by email – that would be wonderful as phone calls are difficult. However if you feel a phone call is necessary is there a time tomorrow (Thurs) or Friday I could phone?

Thank you in advance for your assistance,  
Robyn Withers  
Secretary