



Seventh-day
Adventist Church



South Pacific

Seventh-day Adventist Church Child and Vulnerable Adult Protection Policy

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

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

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

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Acknowledgements

Adsafe would like to acknowledge the tireless work of Safe Place Services in developing and implementing Child Safe Policies over its 16 years of service to the church.



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1 Executive Summary

1.1 History

This version of the policy (V1.3.1) follows the first release of the Adsafes Child and Vulnerable Adult Protection (V1.2) released in July 2020. It represents some minor updating of the document to reflect legislation changes and to address concerns raised in the release of version 1.2. See the document controls for an outline of the revisions.

[<to document controls>](#)

Version 1.2 was an update of the Safe Place Service “Creating a Safe Place Policy” and incorporates some elements from the “Local Conference, Safe Place Policy”.

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

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

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

[<Appendix A: Child and Vulnerable Adult Safe Standards>](#)

[<Appendix B: External Conduct Standard 4>](#)

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

1.2 A New Policy Framework

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

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

Table 1: Adsafes Safeguarding Framework

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



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

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

1.3 Audience

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

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

This document is specifically designed to inform two groups.

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

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

1.4 Governance Implications

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

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

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

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

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



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

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

1.5 Implementation Schedule

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

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

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

Tasks in the implementation schedule (for Version 1.2)

1. The Church Board or equivalent or the Church Company Board (the board) should complete the following tasks no later than **1 July 2021**:
 - a) approve the Child and Vulnerable Adult Protection Policy
 - b) appoint an Adsafes Responsible Officer. (Job description for this role can be found in the Role Requirements Guidelines – being release in conjunction with this policy)

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

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

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

Figure 1: Implementation Framework

Entity or Person

Board or equivalent

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

Appointed Person

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

Policy or Guideline

Executive Summary
Implementation Schedule

1. Adopt
2. Appoint
3. Appoint

Responsibilities

1. _____
2. _____
3. _____

Implementation

1. _____
2. _____
3. _____

One on One Advice and Support (Adsafes)



Training (Adsafes)



Supporting Material

Frequently Asked Questions (FAQ)

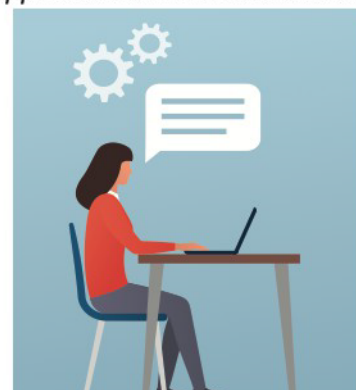
1. _____
2. _____
3. _____

Checklist

- ☒ 1. _____
- ☒ 2. _____
- ☒ 3. _____

Tools

Applications to maintain records





1.6 Other helpful information in this document

For further information on...

Go to...

Why the policy?

[<Policy Rationale>](#)

What does the policy try to do?

[<Policy Aims>](#)

What is the context for this policy?

[<Policy Context>](#)

How do you define...?

[<Definitions>](#)

What legal principles guide the policy?

[<Legal Principles>](#)

What is the applicable key legislation?

[<Key Legislation>](#)

How does the Church Manual and Church Policy guide cvp protection?

[<Church Manual and Policy>](#)

What is Adsafes's role in policy development?

[<Adsafes's role>](#)

Better practice: the role of standards?

[<Child Safe Standards>](#)

What must be done?

[<Implementation Plan>](#)

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



2 Rationale

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

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

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

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

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

3 Aims

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

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



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

4 Context

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

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

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

5 Compliance

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

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

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



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

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

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

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

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



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

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

6 Definitions

Table 2: Definitions

Term	Definition
Adsafes	Organisation set up by the SPD that is concerned with physical and sexual abuse of children and vulnerable adults on its property or by its employees, persons in leadership or volunteers holding positions. This is done by: 1. safeguarding the organisation by the development and implementation of policy and providing training for persons with responsibility who interact with children and vulnerable adults. 2. supporting survivors and their families 3. coordinating independent investigations into allegations 4. managing known offenders and persons of concern 5. providing advice about safeguarding measures, support and risk mitigation 6.
The Adsafes Safeguarding Framework	A suite of Policies, Guidelines and Practices developed by Adsafes to guide the Church, its affiliated entities, Adsafes and the independent investigators that it engages.
Child	A person under the age of 18 years
Church Company	One of: • Seventh-day Adventist Church (Australian Union Conference) Ltd • Seventh-day Adventist Church (South Pacific Division) Ltd • Seventh-day Adventist Church (Greater Sydney) Ltd • Seventh-day Adventist Church (Northern Australia) Ltd



Term	Definition
	• Seventh-day Adventist Church (NNSW) Ltd • Seventh-day Adventist Church (South Australia) Ltd • Seventh-day Adventist Church (SNSW) Ltd • Seventh-day Adventist Church (Pacific) Ltd • Seventh-day Adventist Church (South Queensland) Ltd • Seventh-day Adventist Church (SPD) Ltd • Seventh-day Adventist Church (Tasmania) Ltd • Seventh-day Adventist Church (Victoria) Ltd • Seventh-day Adventist Church (Western Australia) Ltd
CVP	Children and Vulnerable adults
Conference	One of: • Greater Sydney Conference • Northern Australian Conference • North New South Wales Conference • North New Zealand Conference • South Australian Conference • South New Zealand Conference • South New South Wales Conference • South Queensland Conference • Tasmanian Conference • Victorian Conference • Western Australian Conference
Safe Place Services Child Protection Policy Framework	A group of policies consisting of: • Local Church Policy: Safer Environments for Children and Young People (2014.11) • Local Conference: Safe Place Policy (2013.06) • AUC and NZPUC: Creating a Safe Place Policy (2012.01) • Safe Place Services: Framework for Investigations (2011.01) • Safe Place Adjudication Committee - Terms of Reference (28/11/2012)
South Pacific Division of the Seventh-day Adventist Church (SPD)	A division of the Seventh-day Adventist Church that incorporates Australia, New Zealand, Papua New Guinea and the Islands in the South Pacific
Union	One of: • Australian Union Conference of the Seventh-day Adventist church (AUC) • New Zealand Pacific Union Conference of the Seventh-day



Term	Definition
	Adventist church (NZPUC)
Vulnerable Adult	<i>A vulnerable adult is a person who is aged 18 or over who, at the time of the alleged abuse, was or may have been unable to take care of themselves or unable to protect themselves from significant harm, exploitation, or abuse due to a pre-existing psychological, mental and/or physical impairment.</i> <i>Because vulnerability is complex and shaped by multiple factors, Adsafes will determine whether a person meets this definition on a case-by-case basis, considering how different aspects of their situation may interact.</i>

7 Legal Principles

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

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

8 Key Legislation

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

Table 3: Key Legislation

Jurisdiction	Legislation
--------------	-------------



Australian Capital Territory	CRIMINAL CODE 2002 (ACT) • Section 716 - Compounding of offence (All criminal offences from which a person may receive a benefit from silence or non-reporting. – includes Child Sexual Offences) Children and Young People Act 2008 (ACT) • Mandatory reporting – reporting of sexual, physical or emotional abuse of a child – required by doctor, nurse, teacher. Optional by others. Ombudsman Act 1989 • Reportable Conduct – allegation made against persons engaged in the organisation Working with Vulnerable People (Background Checking) Act 2011 • Persons working with Children and VP need to be registered (WWCC)
New Zealand	Children’s Act 2014 Children’s (Requirements for Safety Checks of Children’s Workers)



Jurisdiction	Legislation
	Regulations 2015 - Safety checks on Children's workers (optional for churches) Oranga Tamariuki Act 2017 - Optional reporting of concerns about the well-being of a child or young person Education And Training Act 2020 (NZ) - Employers to report to the Teaching Council a belief that a teacher has engaged in serious misconduct. - Employers to report to the Teaching Council if within 12 months after a teacher ceases to be employed the employer receives a complaint about the teacher's conduct.
New South Wales	Crimes Act 1900 (NSW) - Section 43B – Failure to reduce or remove risk of child becoming victim of child abuse - Section 316A - Concealing child abuse offence Children and Young Persons (Care and Protection) Act 1998 (NSW) - Mandatory Reporting – Reporting sexual, physical, psychological abuse, neglect exposure to DV required by teachers, doctors, nurses only – optional otherwise Children's Guardian Act 2019 - Reportable Conduct – The investigation of alleged conduct about persons engaged by the organisation (church and schools) Child Protection (Working with Children) Act 2012 (NSW) - WWCC – must verify persons WWCC number - Report findings of sexual misconduct and serious physical abuse to the Office of the Children's Guardian.
Northern Territory	CRIMINAL CODE 1983 (NT) - Section 104 - Compounding indictable offences (All criminal offences from which a person may receive a benefit from silence or non-reporting. – includes Child Sexual Offences) Care and Protection of Children Act 2007 (NT) Care and Protection of Children (Screening) Regulations - Mandatory Reporting – Reporting sexual abuse or other exploitation, physical, psychological or emotional abuse or neglect of the child required by only health practitioners. - Ochre Card – person in child related engagement must hold clearance
Queensland	Criminal Code 1899 (QLD) - Section 133 -Compounding an indictable offence – (concealing criminal conduct) - Section 229BB – Failure to protect a child from child sexual



Jurisdiction	Legislation
	offence. - Section 229BC – Failure to report belief of child Sexual offence committed in relation to child Child Protection Act 1999 (QLD) - Mandatory Reporting – Reporting physical and sexual abuse required by only teachers, doctors and nurses - optional otherwise Working with Children (Risk Management and Screening) Act 2000 (Qld) - Blue Card - Religious representatives involving children – must have current positive notice - Churches and schools who are regulated by the blue card system must have a child and youth risk management strategy.
South Australia	Criminal Law Consolidation Act 1935 (SA): - Section 243 - Fabricating, altering or concealing evidence Children and Young People (Safety) Act 2017 - Organisations to have policies and procedures to ensure that safe environments for children and young people are established and maintained (S114) - Organisations to submit a compliance statement to the Department of Human Services indicating that policies and procedures are in place to ensure safe environments for children and young people and re-lodge the statement as soon as reasonably after making changes. Children and Young People (Safety) Regulations 2017 - Mandatory Reporting – Reporting sexual, physical, mental or emotional abuse or neglect by Ministers, employees and volunteers Child Safety (Prohibited Persons) Act 2016 - Not engage persons in child related work without current WWCC - Report persons currently engaged to screening unit if circumstances change Child Safety (Prohibited Persons) Regulations 2019
Tasmania	Criminal Code Act 1924 (TAS): - Section 99 - Suppressing evidence - Section 102 - Compounding crimes – or concealing a crime - Section 105A- Failing to report the abuse of a child - Section 162A - Failing to report the killing of a person Children, Young Person's and their Families Act 1997 (Tas.) - Mandatory Reporting – Report abuse or neglect of a child by Principal, Teacher and Minister



Jurisdiction	Legislation
	Registration to Work with Vulnerable People Act 2013 (Tas) - Section 53A - Duty of reporting body to notify of reportable behaviour by persons it engages - Persons working with children required to be registered The Family Violence Act 2004 (Tas.) - Section 91 - Offence to fail to protect child from harm by a person who has a duty of care in respect of a child
Victoria	Crimes Act 1958 (VIC) - Section 327 - Failure to disclose sexual offence against a child - Section 490 – Failure by a person in authority to protect a child from a sexual offence Children, Youth and Families Act 2005 (VIC) - Mandatory Reporting – Report physical, sexual abuse, emotional or psychological abuse by Principal, Teacher, Nurse, Doctor, people in religious ministry - Section 493 - Offence to fail to protect child from harm by a person who has a duty of care in respect of a child Child Wellbeing and Safety Act 2005 (VIC) - Reportable Conduct – The notification and investigation of alleged conduct about persons engaged by the organisation (church and schools) Worker Screening Act 2020 (Vic) - Persons engaged in child related work required to have a WWC clearance
Western Australia	Criminal Code Act Compilation Act 1913 (WA): - Section 136 - Compounding or concealing offence – concealing criminal conduct including child sexual offences Children and Community Services Act 2004 (WA) - Mandatory Reporting – Report sexual abuse of a child by doctor, nurse, teacher, Minister of Religion Working with Children (Criminal Record Checking) Act 2004 - WWCC – not to engage or continue to engage persons without an assessment or with a negative notice

9 Compliance with the Church Manual and Church Policy

“In order to intentionally protect children and the vulnerable from abuse, and be admitted to membership, or maintain membership of the sisterhood of churches, local church congregations must comply with Adsafes child safe policies. These policies are updated periodically as best practices in this area continue to evolve. It is essential to ensure the version of the policies followed are current.” (SPD Executive Committee Nov 15, 2016)

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



Table 4: Church Manual cvp references

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

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

10 Compliance with Adsafe policies, processes and directions.

10.1 Obligatory Policy, Guidelines and Practices

In accordance with SPD Working Policy the local Church and the Church Company cvp policy, guidelines, practices and actions are to comply with Adsafe policies, processes and directions. This generally will be done by the adoption of a suite of Adsafe developed



policies, guidelines and practices on behalf of the Church or Church Company. These documents will be designed by Adsafes to be compliant with all legal requirements in the jurisdiction and the stated best practice imperatives in child and vulnerable adult protection as found in previously approved Safe Place Service policy, Adsafes policy and Child Safe Standards legislated or recommended by Government bodies.

10.2 Optional Policy, Guidelines and Practice Templates

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

11 A Standards Approach to Protection

11.1 Child Safe Standards

The Australian Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission) recommended to all organisations that work with children the adoption of a set of Child Safe Standards. These standards provide a benchmark that organisations can use to assess their present capability and drive improved outcomes into the future. The Standards approach recognises that each organisation may be at different stages in the development of a child safe culture.

Adsafes is committed to the implementation of these standards within the Church in the South Pacific. Many of the principles and strategies have already been incorporated into church policy through Safe Place Services' work with the church since 2000. While Adsafes is committed to the Standards approach it reserves the right to implement the principles and strategies within each standard from the perspective of the Church's unique worldview.

Since the release of these Standards various Australian governments have announced the obligatory adoption of these standards for their Jurisdiction. This may include the requirement to show compliance through the submission of Compliance Statements. For further information on compliance expectations see [Appendix D](#)

The National Office for Child Safety and the Australian Human Rights Commission has taken the Royal Commission's ten recommended Child Safe Standards and renamed them the National Principles for Child Safe Organisations and made a number of minor adjustments. One notable adjustment is that while the Royal Commission recommended under standard 4, which reads

"Equity is upheld and diverse needs respected in policy and practice."

and item 4.c, which originally read,

"The organisation pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with disability, and children from culturally and linguistically diverse backgrounds" (Final Report Recommendations, page 8, ***final_report_-_recommendations.pdf***)

This has been adjusted to;

"The organisation pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and lesbian, gay, bisexual, transgender and intersex children and young people."
(National Principles for Child Safe Organisations, Page 12, Principle 4, Key action Area 4.3, <https://chilsafe.humanrights.gov.au/national-principles/download-national-principles>)



With this variation, Adsafes on behalf of the Church has chosen to adapt Principle 4 to read,

“Equity is upheld and diverse needs respected in policy and practice within the context of the church’s worldview including its fundamental beliefs and teachings.”,

in acknowledgement of how the church will approach the meeting of the diverse needs of its community. For further detail on Adsafes implementation of these standards see Appendix A

11.2 External Conduct Standards

As Not-for-Profit Organisations, each of the Seventh-day Adventist Church entities registered in Australia are required to comply with the Australian Charities and Not-for-profits Commission (ACNC) External Conduct Standards for all of their work external to Australia. While standards 1 – 3 are outside the scope of Adsafes work, Standard 4 particularly addresses the protection of the Vulnerable Individual. As a consequence this policy will address compliance to this standard. Fortunately many of the elements of External Standard 4 overlap with the requirements of the Child Safe Standards. For an outline of how these standards compare see Appendix B.

While only the work of Seventh-day Adventist Church (South Pacific Division) Ltd routinely works overseas. The other church entities may from time to time run or participate in overseas events where their staff travel and work overseas with vulnerable individuals. While technically local SDA churches in Australia are not registered entities with ACNC, this policy aims to protect Child and Vulnerable Adults and so the principles in this policy applies to any occasional work a church may engage in overseas.

New Zealand SDA entities have no obligation to these standards however in implementing the Adsafes Framework will by default met these standards.



12 Implementation

12.1 Legal Obligations

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

12.2 Compliance with Church Policy

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

12.3 Adoption of church policy and guidelines as developed by Adsafes

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

12.4 Policy Imperatives

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

1. Have systems in place that ensures the **timely adoption and implementation** of child and vulnerable adult protection **policy, guidelines and practices** (the cvp protection framework). (NP10)
2. Have systems in place that ensure **through continual education and training** that volunteers, including persons in governance roles, are **suitably trained and equipped with knowledge, skills and awareness** to keep children and vulnerable adults safe. (NP7)
3. Have systems in place to ensure that the child and vulnerable adult protection framework is **continuously reviewed and improved**. (NP9)
4. Have systems in place to **regularly assess the risk of abuse** in physical and online environments used for church activities and implement plans to **suitably manage** these risks. (NP8)
5. Have systems in place to ensure that **stakeholders** and particularly cvp **are aware of how to report** cvp protection **complaints or concerns** and that the church's reporting obligations are routinely met. (NP6)
6. Have systems in place to ensure that **persons working with cvp are suitable** by using a variety of screening techniques before appointment and are supported by **providing appropriate** post appointment **supervision**. (NP5)
7. Have systems in place to **ensure that cvp protection is a core priority** in the church and is actively **supported by church leadership**, in church governance



decisions and by intentionally and strategically working to improve the cvp culture. (NP1)

8. Have systems in place to ensure that the opinions of cvp are valued and that they are able to participate in any relevant decision-making process. (NP2)
9. Have systems in place to ensure that families and communities are ***appropriately informed and involved in cvp*** matters. (NP3)
10. The diverse nature of our church communities is acknowledged. When responding to cvp protection related matters have systems in place to ***ensure due weight is given to these diverse needs*** and that this is done ***through a framework of equity***. (NP4)
11. A church or church entity may conduct some of its activities overseas from time to time. When this occurs the entity is to ***ensure the safety of vulnerable individuals overseas*** by following the imperatives outlined in 1-10 above and only engage with third parties who will do the same. (ECS4)

12.5 Policy Statement

Risk of abuse mitigation

*For further detail on this section see the document **Risk Mitigation Guidelines – Late 2021***

Two Adult policy

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

Human and Environment factors

2. It is required that the board of a church or affiliated entity routinely assess the child and vulnerable adult risk of abuse associated with all its activities both human and environmental and specifically with relationship to supervisor-child ratios for all age groups over and above those specified in (1) above. For further information and risk assessment templates see the Risk Mitigation Guidelines available from the Adsafes Website – Policy page.
3. It is required that the board of a church or affiliated entity implement a sign-in sign-out system in programs designed for children under 10 years of age but extended to other age groups if the risk is assessed as heightened.

Open Door Policy

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

Privacy

5. The church or church entity is to respect the privacy rights of its employees, volunteers, members and attendees but particularly its children and volunteers by ensuring only authorised digital images and sound recordings are taken on its sites or at its activities and only with the consent of the subject, and for a child, the consent of the parent or guardian.



Managing Risk when Poor Conduct is alleged

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

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

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

6. Disclosures of concerning alleged conduct beside being referred to police or the child protection agency in the jurisdiction, should only be reported to Adsafes or the **Adsafes Responsible Officer** in the organisation and the matter should not be discussed with other community members. Advice on confidentiality from Police, the child protection agency from Adsafes must be followed.
7. For an initial period, Police, the child protection agency or Adsafes may require Child Protection risk to be managed using increased vigilance (closer monitoring) without the person subject of allegation (PSOA) being notified of the allegation. This is to protect the integrity of the investigation.
8. At an appropriate time the PSOA will be notified of the allegation after which risk will be managed in the organisational context by a confidential interim fellowship agreement and a possible standing-down from roles during the investigation.

Managing Risk when Poor Conduct is Sustained

9. The Church may accept as *prima facie* proof of the facts of an allegation the findings of any Court, Professional Tribunal or association, or disciplinary proceeding. In addition, the local church and its Board or Business Meeting may accept as *prima facie* proof of the facts of an allegation, any allegations found proved, established, or sustained by a Professional Standards body, an Adsafes oversight investigation or an investigation established by a Conference, Union, Division or an affiliated entity of the Seventh-day Adventist Church throughout the South Pacific. Individuals who have sustained finding may represent a heightened risk to the community and for the purposes of this policy are referred to as Persons of Concern (POC).
10. Once an investigation either internal or external concludes and in the situation where a sustained finding is given, child protection risk needs to be assessed and managed. This responsibility is given to Adsafes and is coordinated with the senior leadership team of the organisation. Risk is generally managed either through exclusion from services, if the risk is too high, or through a confidential fellowship agreement implemented in the local community.



11. Even in situations where a sustained finding is not made, Adsafes in consultation with the local church is still entitled and has authority to implement short-term and ongoing risk-management strategies.
12. In considering the management of risk associated with the attendance of a POC Adsafes will give attendance preference to Survivors of abuse and as a consequence may ask the POC to attend another church.

Volunteer and Employee Screening

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

13. It is required that all staff and volunteers who are new to the congregation or serving for the first time complete a volunteer information form including referees. Those responsible for appointing staff must check these referees, screen the name against the Adsafes database and, if required by law or policy, complete a successful police background check or its equivalent. (Church Manual, 2016 edition, page 175)
14. It is a requirement that those responsible for appointing staff must:
 - a) develop a detailed job description for the position,
 - b) screen the potential candidates with Adsafes to assess risk,
 - c) check at least three referees including the most recent employer and a referee associated with church attendance,
 - d) include questions relating to child protection and vulnerable adult protection in the interview process.
15. It is a requirement that all church and affiliated entities wishing to appoint persons to governance role or an employed or voluntary designated child related position must ensure that the candidate is cleared in a Working With Children Check or its equivalent.

Waiting Period Policy

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

Training

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



Code of Conduct

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

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

Complaints handling

*For further detail on this section see the document **Complaints Handling Guidelines – 2022***

20. It is required that the board of a church or affiliated entity implement a procedurally fair process to handle complaints about alleged conduct or Code of Conduct breaches in the organisation that includes but is not limited by:
 - a) Mechanisms that advertise the importance to the organisation that concerns be raised and dealt with and further, how, when and to whom a person can raise a complaint.
 - b) A commitment to confidentiality in the process.
 - c) A commitment to an unbiased decision maker.
 - d) A commitment to a decision based on the evidence gathered.
 - e) A commitment to a resolution.
21. Allegations of Criminal conduct, Investigable conduct and serious breaches of a staff code of conduct must be reported to the appropriate authorities as outlined in 26 - 28 below. No church or affiliated entity complaints investigation should commence until the all-clear is given by these authorities and Adsafes. While the police may choose not to investigate allegations of criminal conduct, Adsafes may be required by policy to oversee an independent investigation into these allegations under the definition of Investigable conduct.
22. Best practice in the handling of evidence dictates that complainants and witnesses should not be asked to discuss their evidence prior to being interviewed by an investigator. For this reason members of the church community must be asked not to discuss untested matters until an investigation is completed.

Reporting and Notifications

*For further detail on this section see the document **Reporting and Notifications Guidelines – 2022***

Internal Reporting

23. It is required that the board of a church or affiliated entity designate a **senior officer** to receive all concerns, complaints, allegations or notifications within the organisation and that the mechanism for doing so be displayed prominently in the organisation.



24. Concerned members of the community may and all employees and volunteers must report all allegations of criminal conduct, alleged criminal convictions or other findings, investigable conduct, and breaches of the Code of Conduct to this senior officer. These matters will be dealt with using the complaint handling mechanism listed above.
25. Alternatively concerned members of the community may and all volunteers must report all allegations of criminal conduct, alleged criminal convictions or other findings, investigable conduct, and breaches of the Code of Conduct to Adsafe and seek advice on how to manage the matter.
26. This senior officer will report all alleged criminal conduct to police.
27. This senior officer will report all alleged harm or risk of harm to children to the designated government child protection agency in the jurisdiction
28. The senior officer is to report all allegations of criminal conduct, alleged criminal convictions or other findings, alleged reportable and investigable conduct, breaches of the Code of Conduct to Adsafe and seek advice on how to proceed with the matter. These matters will be dealt with using the complaint handling mechanism listed above.

External Reporting

In addition to the internal reporting mechanism outlined above employees and volunteers may have legal obligations to report abuse to external agencies in their jurisdictions. To this end:

29. Employees and Volunteers are reminded that in some jurisdictions it is a criminal offence not to report current and historical alleged child abuse offences known to an individual to the police. This is typically referred to as **Failure to Report** legislation.
30. Employees and Volunteers who are in a position of authority with the power to intervene are reminded that in some jurisdictions it is a criminal offence not to intervene if it is known that a child is likely to be a victim of a child abuse offence. This is typically referred to as **Failure to Protect** legislation.
31. All mandatory reporters, either employee or volunteers, in the organisation are to report all alleged harm or risk of harm to children to the designated child protection agency in the jurisdiction.

For further information see the Practice update on Legal obligations on the Adsafe Website, Policy page.

Investigations

*For further detail on this section see the document **Investigation Guidelines – 2022***

32. The church, any affiliated entity and Adsafe will defer and cooperate with the police on any allegations that are made a police matter.
33. The church and any affiliated entity will cooperate with Adsafe and the appropriate government agency with any Reportable or Investigable Conduct allegations.
34. Reportable conduct allegations must be notified to the appropriate agency, investigated and the final findings from the investigation be notified



appropriately. All recommendations from the investigation must be implemented.

35. Investigable conduct allegations must be notified to Adsafe, the investigation oversighted by Adsafe and the recommendations from the investigation must be implemented.
36. Any alleged breaches of the Staff Code of Conduct by employees and volunteers may be investigated by Adsafe but if not must be considered for investigation by the appropriate local church or church entity.
37. Any alleged breaches of the behavioural expectations outlined in the Code of Conduct by members or attendees of a local church must be addressed within the church's complaints handling procedures. (See above)
38. Any sustained findings from investigations will inform an Adsafe risk assessment and mitigation process

Compliance Reporting (Internal)

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

Compliance (External Bodies)

41. Church entities offering services and activities for children may have some jurisdictional obligations to show compliance to legislative criteria including but not limited to having Policies and Procedures in place that establishes and maintains child safe environments in those organisations.
42. These obligations are outlined for each of the jurisdictions in Appendix D: Schedule of Compliance Reporting Obligations (External Bodies). The Adsafe Responsible Officer for the church entity will ensure that these Reporting Obligations are met as outlined in the Schedule. [<Appendix D>](#)

Service Trips, Development and Relief work Overseas

43. All elements of this policy statement apply to any planned activities that a Local Church, Local Conference, Union or the Division engages overseas with particular reference to ensuring that within their activities children and vulnerable Adults are protected from abuse.
44. In planning overseas activities the risks be properly assessed and managed including the travel, medical, work and potential conflict zone risk for all participating staff engaged in the activity.
45. That when partnering with overseas third parties in any work with children or vulnerable people that proper due diligence by conducted with those parties including:



- a) checking legal status, reputation and operating procedures
- b) ensuring they hold the appropriate registrations and licences to work with vulnerable people and that they meet the required standard.
- c) prior to the commencement of operations have written agreement that set out roles and responsibilities and further that there is ongoing monitoring of these activities.

12.6 Other related policies and guidelines

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

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

12.7 Implementation Schedule

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

12.8 Safeguarding Framework Guidelines

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

Roles, Responsibilities and Processes

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

Frequently Asked Questions

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

Checklists, Templates and Tools

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



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

☒ = Draft Guideline developed in this project

☐ = Scheduled for development in this project

✓ = Existing Guidelines developed prior to this project

Table 5: *Adsafe Safeguarding Framework: Planned documents*

Item	Roles, Responsibilities and processes	FAQ	Templates, Checklists and Tools
<i>Core Child and Vulnerable Adult Protection Policies Policies that inform churches and church companies</i>			
Child Protection Policy - July 2020 (v1.2) <i>Local Churches and Church Companies</i>	☒	☐	
<i>Core Child Protection Guidelines Guidelines that inform churches and church companies</i>			
Role Requirement Guidelines – July 2020 <i>Local Churches and Church Companies</i>	☒	☐	
Reporting and Notifications Guidelines – 2022 Local churches, church companies and affiliated entities	☐	☐	☐
Risk Mitigation Guidelines - Late 2021	☒	☐	☐
Code of Conduct Guidelines - Nov 2019 Local Churches and Church Companies	☒	☒	
Governance Guidelines - Late 2022 Local Churches and Church Companies	☐	☐	☐
WWCC guideline - Late 2022 Local churches, church companies and affiliated entities	☐	☐	☐



Item	Roles, Responsibilities and processes	FAQ	Templates, Checklists and Tools
Mandatory Reporting - <i>Late 2022</i> Local churches, church companies and affiliated entities	☐	☐	☐
<i>Adsafe Polices and Guidelines</i>			
<i>Policies and Guidelines that inform Adsafes work</i>			
Guidelines for Conducting Investigations	☐		
Survivor Support Guidelines	☐	☐	
Risk Mitigation Guidelines	☐	☐	
Training Guidelines	☐	☐	☐
Complaints handling guidelines	☒	☐	☐
Privacy Guidelines	☒	☐	☐
<i>Guidelines handled outside the cvp Protection framework</i>			
	☐	☐	☐



Appendix A: Child and Vulnerable Adult Safe Standards

The following table outlines the Child and Vulnerable Adult standards relevant to the Church's work within Australia, the jurisdictional requirement for these standards and the Adsafes policy document that addresses each of these standards. It should be noted that each of the standards has a number of sub-elements that provides greater detail on the standard. In the interest of brevity these are not listed here but can be found by following the external links below.

Table 6: Comparison of the Relevant Standards, where it is required and the Safeguarding document that addresses that standard

Source Standard or Principle	Jurisdictional Requirement	Safeguarding framework
<i>National Principles for Child Safe Organisations</i> 1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.	ACT NSW South Australia Tas – CCS1,5e,f Victoria– CSS2 Western Australia	Child and Vulnerable Adult Protection Policy Governance Guidelines Code of Conduct Guidelines Risk Mitigation Guidelines
<i>National Principles for Child Safe Organisations</i> 2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.	ACT NSW South Australia Tasmania – CCS2 Victoria– CSS3 Western Australia	Child and Vulnerable Adult Protection Policy Governance Guidelines
<i>National Principles for Child Safe Organisations</i> 3. Families and communities are informed, and involved in promoting child safety and wellbeing.	ACT NSW South Australia Tasmania – CCS3 Victoria– CSS4 Western Australia	Child and Vulnerable Adult Protection Policy Governance Guidelines
<i>National Principles for Child Safe Organisations</i> 4. Equity is upheld and diverse needs respected in policy and practice within the context of the church's worldview including its fundamental beliefs and teachings.	ACT NSW South Australia Tasmania – CCS1 Victoria– CSS5 Western Australia	Child and Vulnerable Adult Protection Policy Governance Guidelines
<i>National Principles for Child Safe Organisations</i> 5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.	ACT NSW South Australia Tas – CCS5a,b Victoria– CSS6 Western Australia	Role Requirement Guidelines Reporting and Notifications Guidelines Privacy Guidelines



Source Standard or Principle	Jurisdictional Requirement	Safeguarding framework
<i>National Principles for Child Safe Organisations</i> 6. Processes to respond to complaints and concerns are child focused.	ACT NSW South Australia Tasmania – CCS5d Victoria– CSS7 Western Australia	Complaints Handling Guidelines Reporting and Notifications Guidelines Privacy Guidelines
<i>National Principles for Child Safe Organisations</i> 7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.	ACT NSW South Australia Tasmania – CCS5b Victoria– CSS8 Western Australia	Role Requirement Guidelines
<i>National Principles for Child Safe Organisations</i> 8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.	ACT NSW South Australia Tasmania – CCS5g Victoria– CSS9 Western Australia	Risk Mitigation Guidelines
<i>National Principles for Child Safe Organisations</i> 9. Implementation of the national child safe principles is regularly reviewed and improved.	ACT NSW South Australia Tas – CCS4,5h Victoria– CSS10 Western Australia	Child and Vulnerable Adult Protection Policy Governance Guidelines
<i>National Principles for Child Safe Organisations</i> 10. Policies and procedures document how the organisation is safe for children and young people.	ACT NSW South Australia Tasmania – CCS5c Victoria – CSS11 Western Australia	Child and Vulnerable Adult Protection Policy Governance Guidelines
<i>Victorian Child Safe Standards</i> Child Safe Standard 1 – Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued	Victoria	



Source Standard or Principle	Jurisdictional Requirement	Safeguarding framework
<i>ACNC External Conduct Standard</i> 4. A charity must take reasonable steps to ensure the safety of vulnerable individuals overseas. An organisation is to ensure that any overseas operations are undertaken in a way that minimises the risk of harm, exploitation or abuse of a vulnerable adult.	ACT NSW Northern Territory Queensland South Australia Tasmania Victoria Western Australia	Child and Vulnerable Adult Protection Policy Governance Guidelines Risk Mitigation Guidelines Role Requirement Guidelines Privacy Guidelines Code of Conduct Guidelines

Child Safe Standards History

As part of its work the Australian Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission) reflected on what a Child Safe Organisation might look like. A description of the qualities of a child safe organisation was articulated in ten Child Safe Standards. These standards provide a framework to bring about change in an organisation's culture around how it works with children.

The Royal Commission recommended to all organisations that work with children the adoption of this set of Child Safe Standards. These standards provide a benchmark that organisations can use to assess their present capability and drive improved outcomes into the future. The Standards approach recognises that each organisation may be at different stages in the development of a child safe culture.

Adsafe is committed to the implementation of these standards within the Church in the South Pacific. Many of the principles and strategies have already been incorporated into church policy through Safe Place Services' work with the church since 2000. While Adsafe is committed to the Standards approach it reserves the right to implement the principles and strategies within each standard from the perspective of the Church's unique worldview.

Prior to the release of the Royal Commission's recommendations a number of Australian State jurisdictions had implemented their own child safe standards. Since the release various Australian governments have announced the adoption of these standards or commenced their own implementation of the Royal Commission's Standards.

The National Office for Child Safety and the Australian Human Rights Commission has taken the Royal Commission's ten recommended Child Safe Standards and renamed them the National Principles for Child Safe Organisations.

The following table outlines each jurisdiction's present and previous approach to Child Safe Standards.

Jurisdiction	Standards	Previous
New Zealand	No requirement as yet	
Australia	10 National Principles of Child Safe Organisations (NP) <i>Based on the original Royal Commission's 10 Child Safe Standards</i>	Nil



Jurisdiction	Standards	Previous
ACT	10 National Principles of Child Safe Organisations <i>Same as NP</i> Plan for Legislation	Nil
NSW	10 Child Safe Standards <i>Original RC standards</i> Drafted Bill with compliance monitoring	Nil
Northern Territory	Yet to announce	Nil
Queensland	Yet to announce	Nil
South Australia	10 National Principles of Child Safe Organisations <i>Same as NP</i> Legislated with compliance monitoring	Principles of Good Practice
Tasmania	5 Child Safe Standards <i>Proposed variation on NP</i> Drafted Bill	Nil
Victoria	11 Child Safe Standards <i>Based on the NP with an additional standard for work with Aboriginal Children</i> Legislated with compliance monitoring	3 Guiding Principles and 7 Child Safe Standards
Western Australia	National Principles of Child Safe Organisations WA <i>Same as NP</i> Implementation Promoted	Child Safe Organisations guidelines <i>nine child safe domains for organisations</i>

The **National Principles for Child Safe Organisations** can be found at this external link.

[<National Principles>](#)

Victoria has recently moved to the 11 Child Safe Standards from its previous 3 Guiding principles and 7 Child Safe Standards. These can be found at this external link. [<Victorian Standards>](#)

New South Wales has adopted the original 10 Standards as recommended by the Royal Commission. These can be found at this external link. [<NSW Child Safe Standards>](#)

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



Appendix B: (ACNC) External Conduct Standard 4

The External Conduct Standard 4 can be expressed as:

A charity must take reasonable steps to ensure the safety of vulnerable individuals overseas. An organisation is to ensure that any overseas operations are undertaken in a way that minimises the risk of harm, exploitation or abuse of a vulnerable adult.

The ACNC website suggests 9 strategies to minimise the risk of harm to a vulnerable adult. These have been numbered 4.1 – 4.9 and have been matched with the National Child Safe Principles to which the church has already made a commitment.

National Child Safe Principles	External Conduct Standard
1 Child safety and wellbeing is embedded in organisational leadership, governance and culture. 1.1 The organisation makes a public commitment to child safety. 1.2 A child safe culture is championed and modelled at all levels of the organisation from the top down and the bottom up. 1.3 Governance arrangements facilitate implementation of the child safety and wellbeing policy at all levels. 1.4 A Code of Conduct provides guidelines for staff and volunteers on expected behavioural standards and responsibilities. 1.5 Risk management strategies focus on preventing, identifying and mitigating risks to children and young people. 1.6 Staff and volunteers understand their obligations on information sharing and recordkeeping.	4.1 Develop a policy that commits the charity's staff, volunteers, third parties and visitors to protecting vulnerable individuals. Make the safety of vulnerable people an important criterion when selecting third parties. 4.2 Develop a code of conduct outlining appropriate behaviour when working with vulnerable people. 4.8 *Ensure staff and volunteers working overseas have access to suitable housing, food, insurance, medical services and communications. Establish an emergency exit plan for staff and volunteers working in conflict zones or other dangerous locations. 4.9 *Thoroughly check the legal status, reputation and procedures of third parties. Ensure they have the appropriate registrations and licenses to conduct activities with vulnerable people, and that they meet required standards. Have written agreements that clearly set out roles and responsibilities of third parties, and monitor third parties' activities through regular reporting and checks. * Items 4.8 and 4.9 will be addressed through Risk Management strategies
2 Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.	
3 Families and communities are informed, and involved in promoting child safety and wellbeing.	
4 Equity is upheld and diverse needs respected in policy and practice within the context of the church's worldview including its fundamental beliefs and teachings.	



National Child Safe Principles	External Conduct Standard
5 People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice. 5.1 Recruitment, including advertising, referee checks and staff and volunteer pre-employment screening, emphasise child safety and wellbeing. 5.2 Relevant staff and volunteers have current working with children checks or equivalent background checks. 5.3 All staff and volunteers receive an appropriate induction and are aware of their responsibilities to children and young people, including record keeping, information sharing and reporting obligations. 5.4 Ongoing supervision and people management is focused on child safety and wellbeing.	4.3 Ensure staff, volunteers and visitors are aware they must report suspected abuse within the charity. 4.4 Ensure the privacy of vulnerable people is always protected. 4.5 Establish thorough staff and volunteer recruitment processes, including adequate background checks. 4.6 Ensure staff and volunteers are suitably qualified in safeguarding vulnerable people and properly supervised when working with them.
6 Processes to respond to complaints and concerns are child focused. 6.1 The organisation has an accessible, child focused complaint handling policy which clearly outlines the roles and responsibilities of leadership, staff and volunteers, approaches to dealing with different types of complaints, breaches of relevant policies or the Code of Conduct and obligations to act and report. 6.2 Effective complaint handling processes are understood by children and young people, families, staff and volunteers, and are culturally safe. 6.3 Complaints are taken seriously, and responded to promptly and thoroughly. 6.4 The organisation has policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and co-operates with law enforcement. 6.5 Reporting, privacy and employment law obligations are met.	4.7 Have a procedure for confidential complaints that is accessible for all vulnerable adults, staff, volunteers and third parties. Deal with complaints appropriately, sensitively and promptly. 4.4 Ensure the privacy of vulnerable people is always protected.
7 Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training. 7.1 Staff and volunteers are trained and supported to effectively implement the organisation's child safety and wellbeing policy. 7.2 Staff and volunteers receive training and information to recognise indicators of child	4.6 Ensure staff and volunteers are suitably qualified in safeguarding vulnerable people and properly supervised when working with them.



National Child Safe Principles	External Conduct Standard
harm including harm caused by other children and young people. 7.3 Staff and volunteers receive training and information to respond effectively to issues of child safety and wellbeing and support colleagues who disclose harm. 7.4 Staff and volunteers receive training and information on how to build culturally safe environments for children and young people.	
8 Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.	
9 Implementation of the national child safe principles is regularly reviewed and improved.	
10 Policies and procedures document how the organisation is safe for children and young people. 10.1 Policies and procedures address all national child safe principles. 10.2 Policies and procedures are documented and easy to understand. 10.3 Best practice models and stakeholder consultation informs the development of policies and procedures. 10.4 Leaders champion and model compliance with policies and procedures. 10.5 Staff and volunteers understand and implement policies and procedures.	4.1 Develop a policy that commits the charity's staff, volunteers, third parties and visitors to protecting vulnerable individuals. Make the safety of vulnerable people an important criterion when selecting third parties.



Appendix C: Queensland's Child and Youth Risk Management Strategy

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

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

The eight requirements are:

Table 7: Queensland's risk management strategy implementation

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



Appendix D: Schedule of Compliance Reporting Obligations (External Bodies)

New Zealand

No external compliance reporting requirements as at November 2021

Australian Capital Territory

The ACT Government is yet to announce how oversight will occur.

New South Wales

No external compliance reporting requirements as at November 2021

Northern Territory

No external compliance reporting requirements as at November 2021

Queensland

Requirement to have a **Child and Youth Risk Management Strategy**. For further information see Appendix C



South Australia

An organisation offering services or activities for children in South Australia is required to:

1. Adopt Policies, Guidelines and practices that establish and maintain a child safe environment in accordance with the National Principles for Child Safe Organisations.
2. Ensure that all persons appointed to child related work have a current Working with Children Check and are not Prohibited Persons.
3. Lodge and keep updated a Compliance statement with the Department of Human Services (DHS) setting out that their policy documents are in accordance with the National Principles for Child Safe Organisations.

The Compliance Statement

A compliance statement is done online and consists of:

- Your organisations answers to a series of questions about your child safe policies.
- Copies of relevant Policies, Guidelines and Procedures that you upload to the site.

A new organisation must lodge a compliance statement as soon as is reasonably practicable after the adoption of new policy documents and is given six months to complete the statement. When changes are made to an organisation's policy documents the organisation is required to update their statement again as soon as is reasonably practicable after the adoption of the documents. Compliance Statements for an organisation may be reviewed by DHS and requests for further documents or improvements made.

Submitting or updating a Compliance Statement

To make or update your organisation's compliance statement:

1. Register your organisation online if you don't have an existing account. This should be done at [CSEC online lodgement system](#).
2. At this time lodge your statement under the **"Single Organisation"** category.
3. Adsafes has created the Policies, Guidelines and Procedure documents on your behalf and will assist your organisation with any adjustment needed to make these compliant.
4. Answer all the questions on the statement. Seek Adsafes's advice if you are unsure of your answers.
5. Upload the following policy documents (available from the Adsafes website)
 - a. The Child and Vulnerable Adult Protection Policy V1.3.1
 - b. The Role Requirement Guidelines V3.4.1
 - c. The Working with Children Check Guidelines (SA) V1.0
 - d. The Employee and Volunteer Code of Conduct V1.8.1
 - e. Practice Update: SA Mandated Notifications
 - f. Risk Mitigation Guidelines V1.1 (SA)



Tasmania

No external compliance reporting requirements as at November 2021.

Victoria

No present Compliance report required as at November 2021. External monitoring would expect an organisation to show ***Indicators of Compliance*** to each of the standards.

Western Australia

No external compliance reporting requirements as at November 2021.



Appendix E: Document Controls

Document Controls	
Document Name	Child and Vulnerable Adult Protection Policy Child Protection Policy (Church) DV1.3.1.docx
Status	Version 1.3.1 – Final version for release
Version	1.3.1
Created	24 March 2019
Implemented	July 2020
Amended	August 2019 (1.0), Nov 2019 (1.1), July 2020 (1.2), June 2021 (1.3), Oct (1.3.1)
Change Log	V1.0 V1.1 Update of legislation Addition of Queensland Standards V1.2 Addition of executive summary Update of implementation schedule Removal of Appendix E: Mapping of standards V1.3 V1.3.1 8 Key Legislation SA legislative inclusion Child Safety (<i>Prohibited Persons</i>) Regulations 2019 Victorian Legislation Change reference to “Working with Children Act 2005 (VIC)” to “Worker Screening Act 2020 (Vic) Persons engaged in child related work required to have an assessment notice WWC clearance Negative notices taken to be WWC exclusions Interim Negative notices taken to be interim WWC exclusions Inserted Heading 11 A Standards Approach to Protection Changed heading 11 Child Safe Standards to 11.1 Child Safe Standards Revised text on Child Safe Standards Revisions addressing: 1. concerns raised about the church’s approach to Principle 4, 2. the adjustment to Victorian standards - Change from 7 Standards -- > 11 Standards (Implemented by 1 July 2022) 3. South Australia moving to the National Principles



Document Controls	
Document Name	Child and Vulnerable Adult Protection Policy Child Protection Policy (Church) DV1.3.1.docx
	Complete revision of the text <i>Inserted heading</i> 11.2 External Conduct Standards Added discussion on ACNC External Conduct Standards 12 Implementation 12.4 Policy Imperatives Added point 11 (ensuring the safety of vulnerable individuals when engaging in activities overseas) 12.5 Policy Statement Added to the bottom of the section Risk Mitigation “Managing Risk when Poor Conduct is Sustained” Added heading Compliance (External Bodies) after 12.5.34 Added points 12.5.35 and 12.5.36 35 Church entities offering services and activities for children may have some jurisdictional obligations to show compliance to legislative criteria including but not limited to having Policies and Procedures in place that establishes and maintains child safe environment in those organisations. 36 These obligations are outlined for each of the jurisdictions in Appendix D: Schedule of Compliance Reporting Obligations (External Bodies). The Adsafes Responsible Officer for the church entity will ensure that these Reporting Obligations are met as outlined in the Schedule. Appendix A Revised Appendix A to: 1. include a preamble 2. added a table showing all applicable standards, where these are jurisdictionally required and where these are addressed in the Adsafes framework. 3. a history of Child Safe Standards in Australia replaced Appendix B: Victorian CSS with an external link to their website Added Appendix B: ACNC External Conduct Standard 4 Ensuring the safety of vulnerable individual when working overseas Removed Appendix C: South Australian Principles of Good Practice -- SA has moved to the National Principles - MC Renamed Appendix D as Appendix C Added Appendix D: Schedule of Compliance Reporting Obligations



Document Controls	
Document Name	Child and Vulnerable Adult Protection Policy Child Protection Policy (Church) DV1.3.1.docx
	(External Bodies) With specific reference to South Australian Requirements Moved Document Controls to Appendix E
Acknowledgements	Adsafe would like to acknowledge the tireless work of Safe Place Services in developing and implementing Child Safe Policies over its 16 years of service to the church.