



Child Safe Environments Policy

South Australia

1. Purpose

Adults interacting with children and young people occupy a position of trust and influence. The policy aims to ensure the safety and protection of children and young people whilst in the care of Bible Study Fellowship (BSF), consistent with BSF's legal requirements.

2. Commitment to the Safety of Children and Young People

- 2.1 BSF is committed to providing children and young people with a safe and nurturing environment in which they can learn and thrive.
- 2.2 BSF supports, values and respects all children and young people, and is committed to their safety, participation and empowerment.
- 2.3 BSF has zero tolerance for all forms of harm against children and young people, and all allegations will be treated seriously in accordance with our policies and procedures.
- 2.4 The safety, welfare and best interests of the child are paramount.

3. Scope

- 3.1 This Policy applies to all employees, contractors, volunteers and leaders of BSF in South Australia (together referred to as Staff). This includes but is not limited to Children's Program Leaders (including the Children's Supervisor, Children's Leader, Assistant Children's Supervisor and Area Team) (together referred to as leaders).
- 3.2 For the purpose of this Policy, a child or young person means a person who is under 18 years of age.

4. Responsibilities

- 4.1 The safety of children and young people is everyone's responsibility.
- 4.2 At BSF, all Staff have a shared responsibility for contributing to the safety and protection of children and young people.
- 4.3 BSF will ensure, as far as possible, that all Staff are aware of:
 - (a) their responsibilities to create and maintain child safe environments, including their obligations under this Policy; and
 - (b) the appropriate standard of conduct and behaviour which BSF requires of them.
- 4.4 All Staff are required to:
 - (a) read and agree to comply with this Policy and the Child Safety Code of Conduct;
 - (b) participate in BSF's child safety training;

- (c) take all reasonable steps to maintain an environment that prevents the commission of harm against children and young people;
- (d) report concerns about actual or suspected harms or risks of harm towards a child as soon as possible; and
- (e) report any breach or suspected breach of this Policy or the Child Safety Code of Conduct in line with this Policy as soon as possible.

4.5 Teaching Leaders:

- (a) must ensure that all Staff and Applicants are trained on their reporting obligations, this Policy and the Child Safety Code of Conduct and provide such training if not provided by the Children's Supervisors;
- (b) are responsible for ensuring, as far as possible, that all Staff comply with this Policy; and
- (c) must ensure that thorough background checks are completed and recorded for all Staff and Applicants prior to their commencement.

4.6 Children's Supervisors are responsible for:

- (a) providing Staff and Applicants with training on their reporting obligations, this Policy and the Child Safety Code of Conduct;
- (b) supervising children and young people who access BSF's services and programs.

5. Child Safety Code of Conduct

- 5.1 BSF's Child Safety Code of Conduct is publicly available on the BSF website at <https://www.bsfindernational.org/australia-and-new-zealand/>. A copy of the Child Safety Code of Conduct is attached as an appendix to this Policy.
- 5.2 The Child Safety Code of Conduct applies to all Staff. Before working with children, Staff must read, understand and agree to comply with the Child Safety Code of Conduct as a part of BSF's child safety training.

6. Breaches

- 6.1 If BSF becomes aware of a suspected breach of this Policy or the Child Safety Code of Conduct, BSF will take immediate steps to ensure the safety and wellbeing of any child or young person who may be at risk or endanger as a result of or in relation to the breach.
- 6.2 Suspected breaches of this Policy and the Child Safety Code of Conduct are treated seriously by BSF and will be investigated (either internally or externally, depending on the severity of the suspected breach) in a manner which affords procedural fairness to the respondent to the investigation.
- 6.3 Following an investigation into a suspected breach, any person who is found to be in breach of this Policy or the Child Safety Code of Conduct may face disciplinary action (up to and including termination of their engagement with BSF).

7. Children and Young People's Participation

- 7.1 BSF provides a structured and engaging learning experience to children and young people, and actively encourages them to participate in group Bible study and lesson activities in a safe and inclusive environment.

- 7.2 BSF is responsive to the needs of children and young people. We listen to children and young people by:
- (a) using consultation methods which are suited to the age, developmental level and cultural backgrounds of the children and young people who access BSF's services and programs;
 - (b) inviting informal feedback from children and young people about their experiences;
 - (c) clearly communicating (using age-appropriate language) how children and young people (or their parents or caregivers) can report their concerns or provide feedback;
 - (d) outlining the rights of children and young people who access BSF's services and programs.

8. Recruitment Practices

- 8.1 BSF engages in a range of recruitment strategies to help ensure the safety of children and young people, including:
- (a) developing clear position descriptions, examining written applications and engaging in face-to-face interviews (where possible) persons who seek to work or volunteer for BSF as an employee, contractor, leader or volunteer (collectively, Applicants);
 - (b) engaging in a thorough examination of a person's suitability to work with children prior to inviting them to take a leadership position with children; and
 - (c) screening all persons that will (or could reasonably) work with children to verify that they have a valid Working With Children Check (WWCC) before they commence working with children at BSF.

Working With Children Check Screening

- 8.2 Prior to appointing a person to commence work with BSF or perform a role that will (or could reasonably) work with children and young people, BSF will verify that:
- (a) a WWCC has been conducted in relation to person within the preceding five years;
 - (b) the person has provided their full name, address, date of birth and unique identifier to BSF;
 - (c) the person is not prohibited or restricted from working with children.
- 8.3 BSF conducts a WWCC of each of its Staff at least once every five years from the commencement of their engagement.
- 8.4 If BSF becomes aware that any Applicant, or Staff member is prohibited from or has restrictions placed on their ability to work with children, then BSF will notify the central assessment unit in accordance with the Child Safety (Prohibited Persons) Act 2016 (SA).
- 8.5 All information obtained from these screening processes is:
- (a) treated by BSF as confidential; and

- (b) stored and managed in the BSF Class Database, which is validated twice a year by Area Personnel and updated as needed.
- 8.6 An Applicant's identity should not be revealed to other leaders (besides Class Staff) until the screening process has been successfully completed.
- 8.7 BSF has a 'zero tolerance' policy regarding lack of compliance with the screen process for all Staff and Applicants that will (or are likely to) work with children.

9. Supervision, Training, Development and Support for Staff

- 9.1 BSF has strategies and safeguards in place to ensure that all Staff are adequately supervised, trained and supported to understand their obligations and responsibilities to create a child safe environment. Those strategies and safeguards include:
 - (a) induction and/or refresher training for all Staff to support their understanding of their reporting obligations;
 - (b) ongoing supervision by a Children's Supervisor trained in BSF policies and procedures;
 - (c) safety monitoring by a trained assistant Children's Supervisor, and oversight of Children's Supervisor's responsibilities if a Children's Supervisor is absent;
 - (d) training for Children's Leaders before assuming teaching duties and weekly training throughout a BSF class year;
 - (e) compliance with Child Protection Policy monitored by trained Area Personnel overseeing classes; and
 - (f) instructing leaders in procedures for suspected harms and risks of harm towards children.

10. Reporting and responding to a reasonable belief that a child or young person is or may be at risk of harm

- 10.1 BSF is committed to ensuring that children and young people who access BSF's services and programs are kept safe from harm and the risk of harm.
- 10.2 When the BSF suspects that a child or young person has been harmed or is at risk of harm, BSF will handle that suspicion in an appropriate manner which prioritises the safety of children and young people.
- 10.3 All BSF Staff are:
 - (a) mandated notifiers for the purpose of the Children and Young People (Safety) Act 2017 (SA);
 - (b) responsible for reporting reasonable beliefs that a child or young person has been harmed or is at risk of harm.
- 10.4 If, in the course of work with BSF, a Staff member of BSF suspects on reasonable grounds that a child or young person is, or may be, at risk of harm, then the leader or volunteer must report that suspicion by:
 - (a) making a telephone notification to the Child Abuse Report Line (CARL) on 13 14 78; or

- (b) making an electronic notification at <http://www.reportchildabuse.families.sa.gov.au/>.
- 10.5 For the purpose of paragraph 10.4:
- (a) the Staff member who suspects on reasonable grounds that a child or young person is, or may be, at risk of harm is responsible for making a notification of that suspicion; and
 - (b) the notification must include:
 - (i) the name and address (if known) of the child or young person; and
 - (ii) information setting out the grounds for the leader's or volunteer's position.
- 10.6 If a Staff member makes a notification in accordance with paragraph 10.4, the person is strongly encouraged to notify the Children's Supervisor that they have made that notification.
- 10.7 If a Children's Supervisor or leader is notified that a child is, or may be, at risk of harm, they must:
- (a) take immediate steps to ensure the safety and wellbeing of any child or young person who may be at risk or danger;
 - (b) confirm that the concern has been reported in accordance with paragraph 10.4, and if not, assist the Staff member to make the report;
 - (c) complete the *BSF Report of Suspected Child Abuse* form (CP 113) and submit the original to HQ in the *BSF Confidential Envelope for CS* (CP 114); and
 - (d) investigate the suspicion in accordance with the Children's Supervisor Manual, noting that an independent investigation may be appropriate.
- 10.8 In addition to making a notification under paragraph 10.4, if ever there is an immediate risk to a child or young person, then that risk should be reported to Police on 000.

Recognising signs of risk or harm

- 10.9 A child or young person may be at risk of harm if they are behaving irregularly.
- 10.10 The following indicators may indicate that a child or young person is or may be at risk of harm:
- (a) change in usual behaviour.
 - (b) usually and persistently compliant, shy, withdrawn, passive, uncommunicative and unwilling to join group activity.
 - (c) excessively nervous, hyperactive, aggressive, disruptive, or destructive behaviour.
 - (d) persistently fearful of other children and adults, especially if this is a changed behaviour;
 - (e) has an unexplained injury such as a cut, a burn, a limp, broken bone or bruises.

- (f) is emaciated, constantly tired, or showing evidence of malnutrition and dehydration.

Responding to a child or young person who discloses harm

- 10.11 Staff are not engaged as counsellors and are not authorised to provide professional support or hold themselves out as being able to provide professional support when approached by a child or young person who discloses (or wishes to disclose) harm.
- 10.12 The first response to any disclosure made by a child or young person is extremely important. All Staff must follow the HEARTS technique as part of a first response.
 - (a) Hear – Listen, believe and remain calm.
 - (b) Empathise – Encourage, give them your attention, let them use their own words.
 - (c) Affirm that is not their fault – Reassure them and acknowledge that this happened.
 - (d) Record Observations – Keep a record of what has happened.
 - (e) Tell someone – Discreetly notify a Teaching Leader, Children’s Leader or Children’s Supervisor. Privately report your concern to relevant authorities as soon as possible.
 - (f) Self-care – Take care of yourself and seek help if you need it.
- 10.13 Practice confidentiality. Give no information to anyone else. You may call your Area Team for prayer support.
- 10.14 Staff must not, under any circumstances:
 - (a) promise not to tell anyone else or make any other promises that they cannot keep. (Instead, Staff should consider telling the disclosing child or young person in age appropriate language that they are required to report to the relevant authority to help stop the harm and explain the role of these authorities if appropriate. For example, a leader or volunteer could simply say ‘I will need to talk to people to work out what to do next to help you’.)
 - (b) pressure the disclosing child or young person into disclosing more than they want to.
 - (c) bring another child or young person into the disclosure, even if the disclosing child or young person requests this.
 - (d) keep the disclosure a secret.
 - (e) provide any information that the Staff member is unsure about.
 - (f) give any opinions about the disclosing child or young person’s next choices. (Staff should never tell the disclosing child or young person that they should report or that they should say nothing, as this is entirely up to the disclosing child or young person.)
 - (g) ask leading questions. (Rather, Staff could ask ‘what happened next’.)
 - (h) give the disclosing child or young person any of their personal contact information.

Responding to a child person who is harmed or at risk of being harmed by a BSF leader or volunteer

- 10.15 If a Staff member suspects on reasonable grounds that a child or young person is, or may be, at risk of harm by another leader or volunteer, then:
- (a) that suspicion must be reported in the same way as if it arose in relation to a person outside of BSF in accordance with paragraphs 10.4 to 10.8 above; and
 - (b) the person is strongly encouraged to report that suspicion to a Children's Supervisor or Teaching Leader so that steps can be taken to minimise potential harm to children.

11. Reporting and Responding to Complaints or Feedback about BSF

- 11.1 All Staff are responsible for reporting complaints or feedback about BSF's services or programs or the conduct of another leader or volunteer which harms, or is at risk of harming, a child or young person.
- 11.2 All complaints or feedback received by BSF about BSF's services or programs or the conduct of a leader or volunteer will be dealt with:
- (a) promptly, sensitively and fairly;
 - (b) in a manner which reinforces that the safety and protection of children and young people from harm or risk of harm is always of utmost importance; and
 - (c) in a manner which affords procedural fairness to the subject of the complaint or feedback.
- 11.3 When a complaint or feedback is received by a Children's Supervisor or Teaching Leader about BSF's services or programs or the conduct of a leader or volunteer, the Children's Supervisor or Teaching Leader will:
- (a) record and listen to the complaint or feedback;
 - (b) consider whether immediate action must be taken (such as making a report to South Australia Police on 000 if there is an immediate risk to a child or young person);
 - (c) consider whether the subject of the complaint or feedback is a child or young person and, if so, consider whether the complaint or feedback warrants further action (such as making a notification pursuant to paragraphs 10.4 to 10.15 above); and
 - (d) clearly document and securely store decisions and actions taken in response to the complaint or feedback.

12. Risk Management

- 12.1 BSF understands that there are a number of risks associated with its services and programs which may arise in relation to:
- (a) images taken of children and young people throughout the provision of BSF's services and programs;
 - (b) the supervision of children and young people;

- (c) the physical environment in which children and young people engage in BSF's services and programs;
- (d) any physical contact which may occur between Staff and children and young people; and
- (e) the protection of privacy and confidentiality.

12.2 To mitigate or prevent those risks, BSF:

- (a) prohibits photos or videos of children being taken without the consent of a parent or guardian;
- (b) requires that children only attend BSF when their enrolled registered adult is on the host church premises;
- (c) prohibits children being taken off church property for BSF programs;
- (d) prohibits contact with children outside the BSF setting, including email/telephone/social media;
- (e) reviews its risks and implements strategies to minimise its risks on a regular basis;
- (f) provides all Staff with training to support their understanding of their obligations.

13. Communication

13.1 This Policy, BSF's Child Protection Policy and BSF's Child Safety Code of Conduct are:

- (a) included in leader manuals;
- (b) distributed to all leaders and volunteers for review on an annual basis; and
- (c) accessible to parents, caregivers and the general public on the BSF website at <https://www.bsfindernational.org/australia-and-new-zealand/>.

13.2 BSF will provide a link or copy of this Policy to any person in relation to whom BSF provides its services and programs, or at the request of that person.

13.3 By commencing or continuing work with BSF, all Staff acknowledge that they have read, understood and agree to this Policy.

14. Related policies and procedures

Children's Supervisor Manual

Child Safety Code of Conduct

15. Policy review

BSF will review this Policy at least once every five years in accordance with relevant legislation, including the Children and Young People (Safety) Act 2017 (SA).

Appendix A

Child Safety Code of Conduct

As a leader, member or volunteer, I am responsible for promoting the safety and wellbeing of children and young people.

I will:

- Treat children with respect and be a positive role model in my conduct.
- Communicate with children in an age-appropriate and realistic manner.
- Set clear boundaries about appropriate behaviour between myself and a child.
- Physically contact a child only in ways which are appropriate to my agreed role and responsibilities.
- Willingly listen and respond appropriately to a child's views and concerns.
- Respond quickly, fairly and transparently to any serious complaints made by a child or related to a child.
- Abide by my reporting obligations to tell a BSF Children's Supervisor in confidence.
- Ensure a child is never left alone with one adult.

I will not:

- Subject a child to any form of corporal punishment, social isolation, immobilisation, sexual suggestion, offence or misconduct.
- Direct a child to perform in a sexually provocative or unsafe manner.
- Communicate with a child in ways that are likely to humiliate, frighten or distress a child.
- Use tobacco products or possess or be under the influence of alcohol or illegal drugs at any time while working with children.
- Develop any "special" relationships with children that could be seen as grooming/favouritism, such as the offering of gifts or special treatment.
- Do things of a personal nature that a child can do for themselves. However, if help is required due to age or disability (such as toileting or changing clothes), I understand two people must be present.