

1.1 - Management Process for Incidents and other Concerns

Introduction

1. Plain English summary

If you are worried about the safety or wellbeing of someone at church, you can talk to any of the Safe Ministry Contacts, even if you are not a member of the church, and even if you're not sure if there is a problem. The Safe Ministry Contacts will listen to your concerns and figure out what to do next to keep people safe from harm. They will write their decisions down in a report, and the information will be shared with the smallest number of people possible. The Administration Committee will look at the report and might decide that the church should do other things to keep people safe.

2. Purpose and scope

The purpose of this process is to assist Southern Christian Church to help keep people safe. It does this by encouraging people to report any concerns about the safety and wellbeing of people connected to the church, and by ensuring the church responds appropriately when an incident happens or a concern is raised. It outlines responsibilities, principles and processes to follow. The process set out in this document applies not only to incidents, but to complaints, allegations, near-misses or any other concerns (hereafter 'concerns') that relate to the safety or wellbeing of a person at Southern Christian Church. The scope of this process is wide, because we want to do whatever we can to care for people connected to our church community. Therefore, any person who wishes to raise a concern may do so, even if they are not a member of the church, and a concern can be raised in relation to any person connected to the church, even if that person is not a member.

This process forms an important part of our organisation's commitment to creating a culture of safety and protection of vulnerable people, and forms part of our Safe Ministry Policy Framework.

3. Summary of process

Any person who has a concern about the safety or wellbeing of someone connected to Southern Christian Church should raise that concern with any of the following Safe Ministry Contacts immediately:

Safe Ministry Contacts

Liz Shanhun (also Safe Ministry Lead)	0479 173 815	liz@southern.org.au
Ashley Horton	0417 980 293	ash@southern.org.au
Robyn Hofstra	0416 633 739	robyn.hofstra@outlook.com

When a Safe Ministry Contact receives information about an incident or concern, they will listen and collect information about the incident or concern, work through the detailed checklist in this document to determine what needs to be done in response to the concern to keep people safe, and then document this information in a draft written report. The Safe Ministry Contact may liaise with the other Safe Ministry Contacts at any point in this process that they consider will be beneficial.

Approval of draft incident report

No action recommended in the draft report should be taken until the report has been approved by the Safe Ministry contacts as per the below process, unless the Safe Ministry Contact has authority to take a particular action, and that action is urgently required for a person's safety or wellbeing.

The draft report must be sent to all other Safe Ministry Contacts, unless considered inappropriate because of a conflict of interest, in which case it should only be sent to Safe Ministry Contacts without a conflict of interest. The draft report will be finalised once signed off by at least two Safe Ministry Contacts. However, the other Safe Ministry Contact(s) may determine that they disapprove the draft report being finalised, in which case the draft report will not be approved until signed off by all Safe Ministry Contacts.¹

The incident report may recommend that the church take internal action (e.g. recommending a change to a program or policy, developing new training, recommending that a person be removed from a leadership role), and/or external action (e.g. reporting to the Department of Communities under mandatory reporting legislation, reporting to police if there is a concern that criminal activity has occurred). If the Safe Ministry Contacts decide to take external action, they will immediately notify the Administration Committee.

In many cases, the Safe Ministry Lead will have authority to implement recommendations outlined in an incident report (e.g. changing the details of Safe Ministry Training content). In other cases, the Safe Ministry Contacts will only be able to make recommendations which will need to be submitted to others in Southern's governance structures (e.g. policy changes to be approved by administration committee, lead pastor in relation to staff employment). The

¹ This arrangement seeks to allow Safe Ministry Contacts who serve on paid church staff to respond efficiently to incidents or other concerns, without imposing too much time-pressure on those who operate on a voluntary basis, while ensuring all Safe Ministry Contacts are given the opportunity to provide input where considered appropriate.

Safe Ministry Contacts will clarify responsibility for considering and implementing recommendations as part of their incident report.

Concerns should be responded to on a case-by-case basis, considering whether each of the below steps is appropriate in the circumstances.

4. Communication of this process

This document should be made easily accessible to children, vulnerable people, staff, volunteers and families, and will be published on Southern Christian Church's website, the online members' area, and from time-to-time in the weekly email notices. A copy of this process will also be provided to new families who register for our kids' programs, and awareness of this process will also be raised as part of our Safe Ministry Training program.

5. Legislation

- *Children and Community Services Act 2004* – Mandatory reporting for ministers of religion
- *Family Court Act 1997 – s9A* – Definition of family violence

6. Principles

When concerns or incidents are reported, our response will be guided by the following key principles:

- All incidents and other concerns will be taken seriously and responded to promptly and thoroughly;
- Our response will protect the confidentiality, dignity, health and well-being of all individuals involved (including any individuals suspected of behaving inappropriately);
- Special consideration must be given to protecting the interests of children (if they are in any way involved), and we recognise that this may require expert involvement to assist the incident response;
- We will promote a culture where all leaders, volunteers and participants are encouraged to raise concerns and report incidents as they happen. We will make this process accessible to everyone and ensure we meet our reporting obligations (senior staff, regulators, law, insurance) on every occasion.

At each point in the process, the Safe Ministry Contact(s) will need to;

1. Work together with the other Safe Ministry Contact(s) as per the above process to determine a reasonable course of action, based on the information at hand, applying the principles on a case-by-case basis;
2. Ensure the incident and outcomes or responses are thoroughly documented and saved in the central, secure p-cloud folder for incident reports as a record of their decisions;
3. Ensure that roles and responsibilities in relation to any actions they have determined to take are clear, and then take appropriate action, or delegate as required;

4. Manage any conflicts of interest, and ensure that the process is impartial (for example, if an incident involves one of the Safe Ministry Contacts, that Safe Ministry Contact to be excluded from the process where appropriate, Administration Committee to be notified of conflict of interest).;
5. Table the incident report on the agenda for the next Administration Committee meeting, where the Administration Committee will be given the opportunity to review the incident, the Safe Ministry Contacts' response, and make additional recommendations on further specific or general actions to be taken.

7. Governance

A summary of incidents and responses will be regularly reviewed by the Administration Committee at its quarterly meeting. While Safe Ministry Contacts are responsible for the immediate response to the incident or other concern, including reporting externally where appropriate, the Administration Committee is the oversight body responsible for reviewing the safety of our ministries at Southern Christian Church. The Administration Committee will review all incident reports, and have the opportunity to make its own recommendations, in addition to recommendations already made by the Safe Ministry Contacts. The Administration Committee should focus on recommendations preventing, identifying and mitigating risks to children and vulnerable people. One of the Safe Ministry Contacts will be responsible for giving a report to the Administration Committee. Depending on the type of recommendations made by the Administration Committee, responsibility for implementation will rest with the Safe Ministry Contacts, the Lead Pastor or his delegates, the Administration Committee (e.g. if policy changes are required) or the Eldership. Responsibility for considering and implementing recommendations will be clarified at the Administration Committee meeting.

In addition to the quarterly review of incident reports, the Safe Ministry Contacts must immediately report the following to the Administration Committee:

- any actual, alleged or reasonable suspicion of sexual abuse; and
- any external reporting or investigation of any incident or other concern (e.g. contact to the police, report to the Department of Communities, notification to the insurer).

If either of the above occur, the Administration Committee may designate a member of the Administration Committee to be involved in the ongoing management and/or external reporting of the incident.

Further, any actual or alleged sexual abuse, or any reasonable suspicion of sexual abuse should be immediately reported to the Insurer.

8. Confidentiality

All discussion and documentation in relation to the matter or concern will be kept confidential, except to the extent that this process requires other parties to be notified – e.g. if there is a reasonable belief of child sexual abuse and mandatory reporting to the Department of Communities is required, or a team leader needs to be notified of a

particular incident to implement appropriate safeguarding strategies in their team. In these situations, the privacy of the person(s) raising the concern, and of the person(s) the subject of the concern will be respected to the extent possible. Special attention will be given to protect the dignity, safety and confidentiality of anyone who has been the subject of abuse or other harm.

In the event that a staff member is raising a concern related to the lead pastor or their line manager, the confidentiality of the person raising the concern will be protected to the extent possible.

9. Process followed by Safe Ministry Contacts on receiving information about an incident or other concern

This process should be initiated when a Safe Ministry Contact(s) receives a concern or a report of an incident.

Step 1. Record Details of the Concern

When someone raises a concern or is reporting an incident, it's important to record as much detail as possible. The details of those reporting the incident or concern should be kept private and confidential, only made known to those in leadership to the extent necessary to protect people's safety and wellbeing, and to individuals and organisations who are legally required to know those details.

Some significant elements to record include:

- **Name of Safe Ministry Contact who received the report**
- **Date incident/ concern Received**
- **Name of person who raised the incident/concern**
- **Initial details of the concern, including the dates and times of any relevant events**

Record as much of the concern as you can remember. If possible and appropriate, ask the reporter to email their concern.

- **Further details of the concern**

It might be important to ask further questions of the person raising the concern. However, if the person reporting is the alleged victim, it might be important to seek external advice before asking further questions.

- When exactly did the incident occur? Time of day, etc.
- Who else was there?
- What happened before? After?
- Where were you when it happened? Were there things you couldn't see?
- Have you seen something similar before? Since?
- Has anything else happened in relation to this incident since this event?

Step 2. Work through steps

The Safe Ministry Contact who received the Incident/Concern should work through each of the questions below. They may consult with the other Safe Ministry Contact(s) to assist them with this process, or they may go through this process independently and then submit their draft report to the other Safe Ministry Contact(s) in writing.

If the answer to any of the below questions is yes, record the next steps to be taken and who is responsible for taking those steps, and when they are to do so.

1. Are there reasonable grounds to believe that there was or is a risk to somebody's wellbeing or safety?

- A person has reasonable grounds where, based on the information available, a reasonable person would form that belief. It is not the same as having proof, but it is more than mere rumour or speculation.
- and that ,
- It may be helpful to use the decision-tree tool at <https://reporter.childstory.nsw.gov.au/s/mrg>. This tool leads you through a series of questions relating to a concern about harm or wellbeing, and suggests some next steps that may be taken.
- If there ARE reasonable grounds, then the Safe Ministry Contacts must further review the incident or other concern by asking the rest of the questions in this checklist.
- If there are NOT reasonable grounds as per step 1, then the Safe Ministry Contact may either:
 - i. conclude in their draft report that NO further action is required; OR
 - ii. conclude in their draft report that while there are NOT reasonable grounds to believe that was a risk to wellbeing or safety in that particular situation, there would still be benefit to the safety or wellbeing of people at Southern from the Safe Ministry Contacts further considering the incident / concern.

2. If you have concluded in step 1 that further investigation is required, what is the appropriate response?

- Do we have all the information we need to review the incident or other concern and take appropriate safeguarding steps?
- If further information is required, should this be further investigated, and if so, how, when, and who should be involved?
 - Is an internal investigation appropriate, or is it most appropriate to engage an external investigator because of the seriousness of the concern and/or the seniority of the people involved?
 - Note that if an external investigation is initiated, the Safe Ministry Contacts should immediately notify the Administration Committee.
 - Ensure the recommendations of any investigation are recorded and responded to.
- Are there any internal leadership structures that need to be contacted?
 - Note that if there is any actual, alleged or reasonable suspicion of sexual abuse, the Safe Ministry Contacts should immediately notify the Administration Committee.
- Are there any external organisations who need to be contacted? For example:

- Making, or helping the reporter to make an official Report to the Dept. of Communities, either in the form of a general report, or under the mandatory reporting legislation.
 - For further information see <https://www.wa.gov.au/service/community-services/community-support/mandatory-reporting-of-child-sexual-abuse-wa>.
 - If mandatory reporting requirements apply and it is safe and appropriate to do so, facilitate the involvement of the lead pastor, who is one of the legislated mandatory reporters of child sexual abuse. If the lead pastor has a conflict of interest, contact one of the other elders to determine who should make the report.
 - Note that it may still be appropriate to contact the Department of Communities even where mandatory reporting requirements do not apply, where there are concerns about the safety or wellbeing of a child – for example, where there is a concern about family violence (see further s9A *Family Court Act 1997* (WA))
- Contacting the Police to inquire if they need to be informed
- Making a Police Report
- Contacting the Insurance provider – note that this should always occur if there is any actual or alleged sexual abuse, or if there is a reasonable suspicion of sexual abuse.
- Contacting an Elder Abuse Hotline or National Aged Care Advocacy Line on 1800 700 600
- Contacting the National Disability, Abuse & Neglect Hotline 1800 880 052
- Contacting the State Ombudsman to inquire if there needs to be a formal notification.
- Contacting denominational support teams, or Southern Christian Church’s external Board of Reference, particularly if the concern relates to the lead pastor or an elder;
- Contacting any pastoral care persons to provide support to the child and carers.

Following contact with any external agencies:

- record the recommendations made by those agencies, and determine who will take any further action;
 - notify the Administration Committee that an external report has been made.
- Are there any pastoral care needs arising from this situation, e.g. in relation to the suspected victim or anybody else in the church?
 - Does some additional action need to be taken in relation to a leader in the church? E.g.:
 - Communication with the leader, the leader’s supervisor, the Administration Committee or the Eldership?
 - For the safety and wellbeing of those involved, suspension of the leader, or removing from some or all responsibilities while an investigation occurs, or following an investigation?
 - Does some action need to be taken in relation to another person in the church? E.g.:
 - Was there inappropriate behaviour from a member, or a person participating in a church program?
 - Does somebody need to speak with a participant or their parent or guardian?
 - Do standards of behaviour need to be outline?
 - Does a person need to be excluded from a program for a time, or unless certain standards of behaviour are met?
 - Does some action need to be taken in relation to a church ministry, event or program? E.g:
 - Change the way a program operates, cancel a program?
 - Conduct a new Risk Assessment Plan, or amend an operational policy or procedure?

- Implement new training with those that lead the program?
- Who is responsible for taking each of the above actions, and by when?
 - If the Safe Ministry Contacts do not have authority to take a particular action (e.g. suspending a member of staff, amending a policy), who has authority to do so, and who will communicate with them?
 - If the Safe Ministry Contacts recommend an action to be taken, and the relevant decision-maker decides NOT to take that action, the decision-maker should document their reasons for not following the Safe Ministry Contacts' recommendations.

Step 3. Record a Summary and Review Regularly

After the report has been approved, the Safe Ministry Contacts should ensure the report is saved in the central p-cloud Incident Report folder. The report should be tabled at the next Administration Committee meeting for review and further recommendations. The Safe Ministry Contacts are responsible for taking or delegating any immediate action in relation to the incident or concern. Further actions may be recommended by the Administration Committee at its next meeting. If the Safe Ministry Contacts determine that input from the Administration Committee is required more urgently, they may choose to refer the matter to the Administration Committee at an earlier date.

Approved by Administration Committee: **25 November 2023**

Due for review: **November 2024**