


**POLICY: Child Protection    POLICY No. CC.2.2v5**

VERSION CONTROL				
File name:	Policy No.	Reviewed by:	Approval date:	Recommended review date:
Child Protection CC.2.2v5	CC.2.2v5	CRU Board	3/06/2024	3/06/2027
Author:	Gary Hill	Signature:		
THIS POLICY APPLIES TO: all staff and volunteers				
POLICIES AFFECTED: Staff Recruitment, Termination of Employment, Off Program Contact, Communication of Incidents				

## 1. POLICY INTRODUCTION

The Crusader Union of Australia (CRU) has a legal, moral and spiritual responsibility to promote a positive and safe environment for all children we work with, regardless of age, disability, gender identity, sexual orientation, racial, social and religious background. As a result, we are entirely opposed to **child abuse** or related **misconduct** in any form and take our responsibility for children seriously; we take a zero tolerance stance towards such behaviour and, therefore, will never ignore, tolerate or condone any potential or actual child abuse. We do this, being motivated to follow the example of Jesus and being committed to upholding the standards of the gospel as we serve children entrusted to our care.

Our policies and practices in this area reflect CRU’s commitment to the National Principles for Childsafe Organisations in particular, and to child safety in general.

Child protection is a shared responsibility involving CRU and all its **workers\*** (i.e. **employees** and **volunteers**). This policy contains the details of how CRU plans to recognise, prevent and respond to situations of potential harm and any allegation of serious misconduct, **reportable conduct** or child abuse. It includes the ways CRU seeks to appropriately recruit, screen and train workers in child protection, and how we will respond to allegations of harm or abuse. This response includes disclosure to us by a child of abuse by outside agents, as well as allegations of child abuse against CRU’s workers.

CRU is committed to investigate all allegations promptly and fairly to best facilitate justice and care for those who may have been harmed, as well as to protect workers from wrongful allegations of misconduct or abuse.

For the purpose of this policy, a **child** is anyone under the age of 18, unless otherwise stated. The Executive Director is the Head of Relevant Entity for the purposes of fulfilling CRU’s responsibility under the Children’s Guardian Act. For further definitions, see Appendix 1: Definitions.

## 2. POLICY PURPOSE

The main objectives of this policy are to assist CRU to:

- a. Promote a safe environment for children while in our care.

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\* NB: The Children’s Guardian Act 2019 (NSW) definition of an employee: *“for a religious body—an individual who holds, or is required by the religious body to hold, a working with children check clearance for the purpose of engagement with the religious body.”* However, for the sake of consistency with other policies, this policy will use the term ‘worker’ to describe those engaging with the work of CRU in a paid or unpaid capacity, and reserve the term ‘employee’ for those who do so in a paid capacity.

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- b. Give relevant information on how CRU views child protection to those who entrust their children into our care.
- c. Appropriately recruit, screen and train workers in child protection.
- d. Handle all allegations seriously and appropriately.
- e. Protect and care for workers.
- f. Demonstrate commitment to all relevant child protection legislation.
- g. Continue to develop best practice in policy and procedures that seeks to ensure children are protected from harm and abuse.

### 3. POLICY PUBLICATION AND DISTRIBUTION

- a. This Policy will be placed on the general drive of CRU's IT servers.
- b. This Policy will be placed on the **CRU Board** portal.
- c. Documents outlining pertinent features of the policy will be provided to all workers during orientation and training.
- d. This policy will be available on our website.
- e. This Policy will also be given to:
  - Any person who makes an allegation of reportable conduct in CRU's ministry; and
  - Any person who requests a copy.

### 4. LEGAL REQUIREMENTS

CRU is covered by the following relevant legislation and seeks to comply with each Act. In NSW, these are:

Legislation	Focus	Status
Children and Young Persons (Care and Protection) Act 1998 (NSW)	Child or young person at risk of significant harm → Community Services	Every CRU worker is classified as a <b>"mandatory reporter"</b>
Children's Guardian Act 2019 (NSW)	Allegations of <b>'reportable conduct'</b> against workers → Office of the Children's Guardian (OCG)	CRU is classified as a <b>"relevant entity"</b>
Child Protection (Working with Children) Act 2012 (NSW)	Child-related employment screening → Office of the Children's Guardian (OCG)	Must comply

Additionally, other pieces of legislation can include sections pertaining to child protection. It is worth specifically noting two sections of the NSW Crimes Act 1900 that were added in August 2018 – Section 43B and Section 316A. In summary, these sections state that failing to take reasonable steps to reduce or remove the risk of a child becoming a victim of child abuse is a criminal offence. Failing to ensure that the police are notified of child abuse offences is also a criminal offence.

CRU has processes to monitor changes in legislation and best practice in regards to child protection, including those of the Royal Commission into Institutional Responses to Child Sexual Abuse, and implement recommendations as appropriate to our context.

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## 5. ROLES AND RESPONSIBILITIES

Role	Responsibility
Executive Director (Head of Relevant Entity)	<p>Under the Children and Young Persons Act:</p> <ol style="list-style-type: none"> <li>1. Ensure that systems are in place to report children or young people who are at risk of significant harm.</li> <li>2. Ensure that CRU's policies, procedures and practices are in line with the Act in relation to child protection.</li> </ol>
	<p>Under the Children's Guardian Act:</p> <ol style="list-style-type: none"> <li>1. Establish systems within CRU to ensure that the Children's Guardian is advised of any allegations of reportable conduct against workers.</li> <li>2. Investigate any allegation of serious misconduct or abuse, following the Principles of Investigation outlined in Appendix 6.</li> <li>3. Notify the Children's Guardian as soon as possible and no later than 7 business days after being made aware of the allegation.</li> <li>4. Notify the Children's Guardian whether or not CRU plans to take disciplinary or other action in relation to a staff member who is the subject of a reportable allegation or conviction, and the reasons for taking or not taking such action as soon as practicable.</li> <li>5. Provide the Children's Guardian with any documentary and other information as the Children's Guardian may from time to time request to assist in the Children's Guardian's oversight of an allegation.</li> </ol>
	<p>Under the Child Protection (WWCC) Act:</p> <ol style="list-style-type: none"> <li>1. Ensure that policies and procedures are in place to ensure that CRU only employs those with a verified Working with Children Check (WWCC) clearance to work with children.</li> <li>2. Remove any barred or unauthorised person from child-related work.</li> </ol>
	<p>As Executive Director of The Crusader Union of Australia:</p> <ol style="list-style-type: none"> <li>1. Ensure procedures are in place so that all workers of CRU are aware of their responsibilities under this policy in respect of: <ul style="list-style-type: none"> <li>• standards of personal behaviour;</li> <li>• the requirements of the CRU's Child Protection Code of Conduct (see Appendix 2);</li> <li>• strategies for minimising harm and preventing child abuse;</li> <li>• reporting and record keeping requirements;</li> <li>• responding to disclosures and/or allegations of child abuse.</li> </ul> </li> <li>2. Monitor the implementation of this policy including the necessary record keeping required to ensure adherence to all obligations detailed within.</li> <li>3. Facilitate the training and professional development of staff and volunteers required for the implementation of this policy.</li> <li>4. Facilitate the pastoral care of any child who has been harmed while under the supervision of any CRU's activity.</li> <li>5. Facilitate the pastoral care of any worker who is the subject of any allegation of child abuse.</li> <li>6. Facilitate the appropriate pastoral care for CRU's workers who hear and report disclosures of child abuse.</li> <li>7. Bring this policy to CRU Board for review at least once every three years.</li> </ol>

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CRU Board Chair	The Chair may assume the role of Head of Relevant Entity when the Executive Director is on extended leave, when allegations involve the Executive Director, or at other times when deemed most appropriate.
Divisional Heads (also known as 'Divisional Directors')	<ol style="list-style-type: none"> <li>1. Conduct reference checking in line with Staff Recruitment Policy and/or other relevant procedures.</li> <li>2. Ensure that each worker is only employed or engaged after their WWCC is verified and the result of "cleared" or "in progress" is recorded.</li> <li>3. Ensure that each worker maintains a current (ie: not expired or barred) WWCC as long as they are engaged by CRU.</li> <li>4. Ensure all workers undertake and maintain <b>CRU's Child Protection Certificate</b> training in a timely manner and have agreed to CRU's Child Protection Code of Conduct.</li> <li>5. Provide a copy of and/or access to CRU's Child Protection Overview (as is seen in Appendix 3) to all workers.</li> <li>6. Provide regular training and/or professional development to all staff and volunteers within their division on matters pertaining to child protection.</li> <li>7. Report to the Executive Director any allegations or findings of misconduct involving children made against staff or volunteers.</li> <li>8. Assist the Head of Relevant Entity with investigations where required.</li> <li>9. Conduct regular monitoring of the implementation of this policy and report to the Executive Director areas of weakness and/or misapplication in the implementation of the policy.</li> </ol>
All Workers (ie: employees and volunteers)	<p>Regarding their conduct:</p> <ol style="list-style-type: none"> <li>1. Agree to and follow CRU's Child Protection Code of Conduct (Appendix 2) and related child protection procedures, including but not limited to off program conduct and use of social media procedures, recognising that failure to follow these may result in disciplinary action appropriate to the offence. This action may range from a warning up to termination of the role/employment.</li> <li>2. Agree to act in a way consistent with CRU's Child Protection Overview (Appendix 3) and CRU's Child Protection Training Guidelines (Appendix 4).</li> <li>3. Realise that if they engage in reportable conduct outside of work, this also requires reporting and investigation by CRU and may affect their ongoing ability to find child-related employment.</li> </ol> <p>Regarding their Working with Children Check (WWCC):</p> <ol style="list-style-type: none"> <li>1. Hold and maintain a valid and cleared (or 'in progress') Check.</li> <li>2. Not engage in child-related work at any time that they are subject to an interim bar or a bar.</li> <li>3. Report to the Executive Director if they are no longer eligible for a WWCC, if the status of their check changes, or if they are notified by the OCG that they are subject to a risk assessment.</li> </ol> <p>Regarding CRU's Child Protection Training and Procedures:</p> <ol style="list-style-type: none"> <li>1. Hold a current CRU Child Protection Training Certificate.</li> <li>2. Attend all required training and professional development on matters relating to child protection. (This includes being familiar with CRU's Child Protection Training Guidelines, as outlined in Appendix 4, which must be read prior to gaining a CRU Child Protection Training Certificate.)</li> <li>3. Provide feedback and make recommendations to their Divisional Head on ways of improving CRU's overall system of child protection.</li> </ol>

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	<p>Regarding disclosures and allegations:</p> <ol style="list-style-type: none"> <li>Report the existence of any allegations or disclosures made to them in a timely manner and in accordance with the Communication of Incidents Policy. Any worker of CRU is required to report to their Camp Director or Divisional Head any of the following: <ul style="list-style-type: none"> <li>Allegation of sexual misconduct towards a child;</li> <li>Allegation of physical assault towards a child;</li> <li>Allegation of mistreatment towards a child;</li> <li>Observed breach of CRU’s Child Protection Code of Conduct by a worker;</li> <li>Inappropriate conduct towards a child by a worker;</li> <li>Disclosed information that alleges harm to a child by another person;</li> <li>A situation where a child displays evidence of neglect, physical or behavioural characteristics that causes concern for their safety and/or welfare.</li> </ul> <p>Camp Directors must report any of these allegations or disclosures to their Divisional Head.</p> </li> <li>If it is felt that CRU has not responded and reported appropriately on a disclosure or allegation, raise this concern with the Executive Director. If the disclosure/allegation is still not handled appropriately, report this to the Police and/or the Department of Communities and Justice (DCJ) and/or Office of the Children’s Guardian.</li> <li>Keep written records of all such conversations. (See Appendix 5.)</li> <li>Follow the requirements of Mandatory Reporting as outlined in CRU’s Child Protection Training Guidelines (Appendix 4).</li> </ol>
	<p>Regarding other workers’ behaviour:</p> <ol style="list-style-type: none"> <li>All employees are to report, typically in writing, to the Executive Director any concerns they have about another employee or volunteer engaging in reportable conduct or any allegation of reportable conduct. All volunteers should report this, typically in writing, to their Divisional Head, who will report to the Executive Director.</li> <li>If workers are unsure whether it is reportable conduct, but consider the behaviour inappropriate in any way, it is still be reported.</li> <li>They are also to report if they are aware that any worker has been charged with, or convicted of, an offence involving reportable conduct.</li> <li>They are to take any practicable steps to ensure that children are protected from harm, including when it is reasonable to believe that another worker could harm a child.</li> </ol>

## 6. CREATING A CHILD-SAFE ENVIRONMENT

CRU seeks to prevent children from encountering harm by creating a child-safe environment by ensuring appropriate selection and training of all workers. Promoting a safe environment for children also extends beyond matters like abuse to areas of preventing neglect, bullying, assault, grooming, crossing professional boundaries, sickness and injury. It also requires due consideration of general safety and this is achieved by activity risk assessments using CRU’s Risk Management Framework, which can be found in a separate policy.

*NB: the following steps for section 6 are outlined in reference to NSW legislation and procedures. Equivalent processes will be in place for CRU’s activities in other states. For details on CRU’s procedures in WA, refer to Appendix 7.*

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## 6.1 Appropriate recruitment, screening and training of workers

1. According to the Children's Guardian Act, all positions within CRU are classified as mandatory reporters of any child abuse they suspect, and will be subject to investigation should an allegation be made against them.
  - a. Information regarding child protection provisions will not necessarily be included in advertisements for new workers, but this will be part of any information package sent to applicants.
2. All members of the CRU Board are required to be verified under the Working with Children Check, in accordance with the Child Protection Act 2012.
3. Prior to commencing work with us, all employees and volunteers will be verified via a NSW Working with Children Check, in accordance with the Child Protection Act 2012.
  - a. CRU will not employ, or allow volunteering by, any person who fails to provide their WWCC number or is not cleared prior to commencing work.
    - i. Anyone who becomes barred from working with children can expect their employment to be terminated.
    - ii. Anyone who has an interim bar, or has an allegation made against them, will immediately be suspended from child-related employment until the matter can be fully investigated. (This may be a suspension from some or all of their duties.)
  - b. In the case where an APP number is given, the verification result of "In Progress" is considered suitable for engagement. However, a subsequent verification must result in a cleared status in a reasonable timeframe. If the in-progress status remains "in progress" for over 6 weeks for a continuing worker, the Executive Director should be advised. Prolonged delay may require the Executive Director to perform a risk assessment and take subsequent action, which may include termination of contract.
  - c. Exemptions to the requirement of a NSW WWCC verification may apply in any of the following circumstances:
    - i. Workers are under 18 years of age. CRU will however require they be reference checked with their school or other suitable body/person. If they have ongoing work with us, they will be encouraged to apply for their WWCC clearance three months prior to their 18th birthday. All workers under 18 will be required to do the CRU Child Protection Certificate training.
    - ii. Workers meet the specific exemption categories outlined by the Office of the Children's Guardian (OCG) (e.g. short-term workers from overseas or interstate). All other child protection requirements will still be required.
    - iii. The camp or program on which the worker is engaged occurs in a state or territory other than NSW, in which case the Executive Director will set out the guidelines under which verification must occur. Typically, this involves verifying each leader via the WWCC provisions of their home state or territory, however the exact details will depend on various factors, including the state or territory the leaders reside in and how long they have been residing there, which state or territory the camp begins and ends in, and the duration of the camp or program. The process for WA is covered in Appendix 7.
    - iv. The Executive Director deems the engagement of a worker will be restricted to a limited, short-term period with no direct, face-to-face contact with children.

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4. Additionally, all new workers will need to be reference-checked prior to commencing any paid or voluntary position with us by communication with a suitable referee(s) to ensure they are of good character. Specifically, the referee(s) must be asked, at a minimum, the question, “Is there any reason that you know of why [applicant] shouldn’t be working with children?”
  - a. As per our Staff Recruitment Policy Org.1.2, new employees’ most recent employer and/or a leader from their church must be used as a referee. Details of which referees are mandated in various scenarios are outlined in the Staff Recruitment Policy.
  - b. All volunteer leaders require at least one external referee check with a leader from their church.
  - c. Volunteers are to be re-reference-checked if their previous check is older than 2 years.
5. All workers will receive training in child protection before commencing working with children, and this will be renewed on a regular basis. They are required to have a current CRU Child Protection Certificate, and to agree to and abide by CRU’s Child Protection Code of Conduct.

## 6.2 Handling complaints, disclosures and allegations seriously

In some cases, complaints or disclosures of abuse may be heard by our workers, as well as allegations made against our workers. In these situations, it is important that the response is fair, timely and takes the matter seriously.

1. Each full day or residential program catering for children will have some way for children or a responsible adult to raise their concerns and will encourage a culture of listening in a supportive environment. These pathways for raising concerns will be communicated to children and adults, as is appropriate for each program, in a child-friendly way.
2. All complaints, disclosures and allegations will be treated seriously and appropriately. The reporting procedure details are in the Communication of Incidents Policy.
3. CRU undertakes to be a mandatory reporter and follows the obligations required by this. The Executive Director or his designate will make the appropriate referral to the Department of Communities and Justice and/or police.

## 6.3 Allegation of abuse or misconduct against a worker

If the allegation of reportable conduct is against a CRU worker, further investigation needs to be done by CRU, after the police and Community Services have completed their investigations as necessary.

1. Any person who is the subject of an allegation will be suspended until the investigation is complete. This suspension may be from all duties or just from some duties as directed by the Executive Director, based on an appropriate risk assessment. (Typically, this suspension will be on full pay.)
2. The Executive Director or Divisional Head will ensure reporting of any matters involving children at risk of significant harm to Community Services according to the *Children and Young Persons (Care and Protection) Act 1998*.
3. The Executive Director, as the Head of Relevant Entity, will also make an initial report regarding the allegation against the worker to the Children’s Guardian.
4. Community Services and the police will do their investigations as necessary. Once those investigations are complete, the Executive Director will be responsible for overseeing the undertaking of investigations within the organisation, including making findings and taking the appropriate and required action. This includes any risk assessments required.

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5. A final report will be provided to the Children’s Guardian.

Further comments:

- i. If an allegation is made against the Executive Director, then the Chair of the CRU Board takes on the role of the Executive Director in the reporting and investigating above.
- ii. All workers will be treated with procedural fairness in the investigation of any allegation made against them. Further details of this can be found in Appendix 6.
- iii. In some circumstances the police may need to be called. Ideally this is to be done by the Executive Director or the senior investigator conducting a Children’s Guardian investigation. However, in the case of an immediate threat, there should be no delay in contacting the police and another staff member may be required to contact them and advise the Executive Director promptly afterwards.
- iv. All workers should be aware that allegations regarding their conduct outside of their involvement with CRU are also reportable to the Children’s Guardian, require investigation and may also result in suspension or termination.
- v. The Executive Director will report these matters as appropriate to the Chair of the CRU Board.
- vi. If any party is unhappy with the results of an organisational investigation, they have the right to make a complaint to either CRU’s Executive Director or the Chair of the CRU Board. If they are unhappy with CRU’s response, they are welcome to lodge a complaint with the Children’s Guardian.

**7. DOCUMENTATION AND RECORD KEEPING**

- 1. CRU is committed to keeping accurate records of all matters required by this policy and to take all reasonable measures to prevent unauthorised access to information held on paper or electronic system.
- 2. All documents and statements relating to any investigation or complaint made against an employee of the organisation are to be kept confidential. Records of investigations into reportable offences will be stored by the Executive Director with access strictly on his or her authority and will be stored for at least 45 years in a secure location. All workers with “sustained” allegations of reportable conduct will be designated “persona non grata” with notes available to the relevant Divisional Head.
- 3. Where CRU collects and/or holds personal information relating to this policy, it does so in accordance with the Privacy Act 1988 (Cth).
- 4. Outcome of the results of WWCC verifications must be recorded and stored.
- 5. A worker against whom a finding has been made that the worker has engaged in
  - i. sexual misconduct committed against, with or in the presence of a child, including the grooming of a child, or
  - ii. Any serious physical assault of a child,

is entitled to apply for access under section 46 of the Child Protection (Working with Children) Act 2012 to any information about the finding.

- 6. All workers’ pertinent records will be kept in a secure location. This includes current staff (including permanent and casual staff) and ex-staff, along with current and former volunteers.

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**8. PASTORAL CARE**

1. CRU undertakes to facilitate appropriate counselling, pastoral care and support to any child where an allegation of misconduct or abuse by a CRU worker has been reported. This response will be determined in consultation with the parent(s)/guardian and in partnership with the relevant Government or community agencies.
2. Where the allegation is against a CRU worker, CRU will implement its policy of investigation rigorously and without prejudice. An appropriate pastoral care response will be considered by the Executive Director.
3. CRU will facilitate the appropriate pastoral care for CRU workers who hear and report disclosures of child abuse.

**9. CRU EVENTS IN OTHER STATES OR JURISDICTIONS**

If a worker is to be engaged in, or a matter relates to, a jurisdiction other than NSW, the principles above should be followed and the relevant jurisdiction legislation adhered to. (The procedure for WA is outlined in Appendix 7.)

**10. REVIEW OF POLICY**

The Executive Director is required to promptly revise this policy in light of legislative and best practice changes and at minimum bring this policy to the CRU Board every three years for review.

**END OF POLICY DOCUMENT**

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## APPENDIX 1: Definitions\*

1. **Agency investigation of an allegation against a worker:** refers to the investigation undertaken by CRU when an allegation has been made against an employee or volunteer. This investigation is undertaken in consultation with direction from the Children’s Guardian and may involve contact with the police and Community Services.
2. **Child:** any person under the age of 18.
3. **Child Abuse** means all forms of physical abuse, emotional ill treatment, bullying, sexual abuse and exploitation, neglect or negligent treatment, exposure to domestic violence or substance abuse, commercial or other exploitation of a child and includes any actions that result in actual or potential harm to a child.
4. **CRU** means The Crusader Union of Australia.
5. **CRU Board** is the governing body of The Crusader Union of Australia.
6. **CRU Child Protection Certificate** is an internal online child protection training course completed by all workers.
7. **Employee:** refers to a paid, permanent or casual worker employed by CRU.
8. **Mandatory Reporter** is a person or agency in NSW required by under Section 27 of the *Children and Young Persons (Care and Protection) Act 1998 NSW* to report to the Child Protection Helpline or Child Protection online reporting system when he/she has reasonable grounds to suspect that a child, or a group of children, is at risk of significant harm from abuse or neglect, and those grounds arise during the course of or from the person’s work.
9. **Misconduct** is any behaviour that breaches the CRU Child Protection Code of Conduct and/or does not meet the standard of personal behaviour required of a Crusaders worker.
10. **Relevant entity** is an organisation described in Section 12 of the *Children’s Guardian Act 2019 NSW*, which is required to comply with this legislation, including notifying the Children’s Guardian of and conducting an investigation into alleged **reportable conduct**.
11. **Reportable conduct** is defined in Sections 20 – 25 of the *Children’s Guardian Act 2019 NSW* and includes:
  - a) any sexual offence or sexual misconduct committed against, with or in the presence of a child (including grooming behaviour, a child pornography offence or an offence involving child abuse material);
  - b) any assault, ill-treatment or neglect of a child;
  - c) any behaviour that causes psychological harm to a child; or
  - d) a failure to take reasonable steps to reduce the risk of a child becoming a victim of child abuse, or a failure to report child abuse of which they knew or reasonably ought to have known; regardless of whether a child has consented to the conduct.
12. **Reportable allegation or conviction:** refers to an allegation or conviction of reportable conduct.
13. **Volunteers** are those who give of their time to participate in a CRU activity but are not paid a fee for their services.
14. **Workers:** refers to both paid staff and volunteers. (Note, however, this policy does not apply to visiting tradesmen, contractors, delivery drivers and such like.)

\* For additional definitions, please refer to the glossary section of the NSW Mandatory Reporter Guide. Legal definitions of these and other terms are provided in the respective Acts.

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**APPENDIX 2: CRU Child Protection Code of Conduct (version 1.1)**

The Crusader Union of Australia (CRU) is committed to providing a welcoming, supportive and safe environment for all children and young people whom we come into contact with during the course of our programs and activities. We undertake to act with integrity and transparency and uphold all requirements of child protection law and best practice.

This code is applicable to all who serve with CRU, whether paid or voluntary. It is consistent with the details included in the CRU’s Child Protection Policy and Training Certificate that all CRU workers and volunteers complete.

As a representative of CRU, I commit myself to keeping this code of conduct which requires me to show care to all children, treating them with respect and honesty, providing a positive role model of Christian living in all I do.

**I will:**

- treat all children with dignity and kindness, refraining from discrimination against, showing different treatment to or favouring children to the exclusion of others
- use appropriate and positive language around children
- spend time with children within the boundaries set up in any CRU activity (camp or school event) and adhere to post event policies and procedures. This includes having another adult present or in sight when with a child
- respect the confidentiality of a child’s personal information including but not limited to the use of images on social media and other public platforms
- report any possible or actual breaches of this code of conduct to the relevant manager or authority as soon as I become aware of the situation

**I will not:**

- cause any harm to, mistreat or neglect any child
- show favouritism or inappropriate attention to any child, including the giving of gifts
- allow or tolerate bullying or humiliation of a child by other children or adults
- have any inappropriate physical contact with children or unnecessarily restrain children for behavioural management
- initiate or have any sexual or inappropriate personal relationship with a child, being aware that such contact is reportable conduct
- provide to or allow the use of pornography, illegal drugs, alcohol or tobacco by children
- conduct any activity that is unsafe or in breach of CRU’s Child Protection Policy and Training Guidelines

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**APPENDIX 3: Child Protection Overview [NB: In practice, this overview also includes Appendix 2 above, the Child Protection Code of Conduct, as the final page.]**

Version 1.2

# CRU Child Protection Overview

The Crusader Union of Australia (CRU) has a legal, moral and spiritual responsibility to promote a positive and safe environment for all children we work with, regardless of age, disability, gender identity, sexual orientation, racial, social and religious background. As a result, we are entirely opposed to child abuse or related misconduct in any form and take our responsibility for children seriously. We do this, being motivated to follow the example of Jesus and being committed to upholding the standards of the gospel as we serve children entrusted to our care.

This commitment to child protection includes workers' conduct outside their role or involvement with CRU.

This document has been given to you, to summarise the key features of our Child Protection Policy. We encourage you to keep it in a place that you can easily refer to it if needed. The CRU Child Protection Policy can be found on CRU's website: [www.cru.edu.au/child-protection-statement/](http://www.cru.edu.au/child-protection-statement/)

## Responsibilities for ALL Workers

Prior to engaging in child-related work, all workers (staff and volunteers) must:

- Hold and maintain a valid Working with Children Check (WWCC).
- Provide contact details for suitable referees.
- Hold a current CRU Child Protection Training Certificate (which expires every 3 years).
- Have signed the CRU Child Protection Code of Conduct (which is re-signed every time the Child Protection Training Certificate is undertaken).

During child-related work, all workers (staff and volunteers) must:

- Act in accordance with the CRU Child Protection Policy and Code of Conduct at all times.
- Report the existence of any allegations or disclosures of child abuse made to them as a CRU worker, as soon as possible, to their Divisional Head, Site Director or Camp Director.
- Report to the Executive Director any concerns they have about the reportable conduct of an employee or volunteer of CRU.

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# Recognising Child Abuse

Child Abuse may take many forms:

- **Sexual abuse:** any sexual act or sexual threat imposed on a child, including suggestive behaviour and inappropriate touching.
- **Physical abuse:** non-accidental injury and/or harm to a child or an injury caused by excessive discipline.
- **Emotional and psychological harm:** behaviours that may psychologically harm a child, including severe verbal abuse and threats of abuse or excessive and unreasonable demands.
- **Neglect or relinquishing care:** where a child is harmed by the failure to provide the child with the basic necessities of life, such as nutrition, hygiene/clothing, supervision, shelter, medical and mental health care, or schooling/education; or a parent/carer states they will not or cannot continue to provide care for a child.
- **Danger to self or others:** a child is a danger to themselves or others, including suicide or self-harming behaviour, and the parent/carer is unwilling or unable to provide appropriate support.
- **Carer concern involving domestic violence, substance abuse or mental health concerns:** where the child is a witness to any form of abusive behaviour used to gain control and maintain control over another person in the family unit, or where a child is significantly affected by the mental health or substance abuse of a parent/carer.

Fuller definitions can be found in NSW Mandatory Reporter Guide:

<https://reporter.childstory.nsw.gov.au/s/mrg>

Workers should also be aware of and vigilant in responding to other types of abuse including camper-camper bullying and spiritual abuse from leaders pressuring children or making them feel excessively guilty.

**If you suspect that abuse has taken place you need to report it as soon as possible.**

**Ensure that the child is not in any immediate danger. If there is immediate danger to the child, call the Police.**

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# Responding to Child Abuse

If there is reason to believe that abuse has taken place workers should:

## 1. LISTEN

Listen carefully, treat the information with great priority and stay calm.

## 2. REASSURE

Reassure the child. Don't dismiss what you are being told, let them know you hear what they are saying. Only ask clarifying questions that are necessary to be clear about what they are telling you. Assume the child is telling the truth. The child is to be protected and made to feel safe. Inform the child of what needs to happen next. Do not promise confidentiality to any child.

## 3. REPORT

The trust of the child should be maintained but all staff and volunteers are obligated to report any such disclosure, suspicion or reportable conduct to the Camp Director, Site Director or Divisional Head as soon as possible. The Camp Director has the responsibility to inform the Divisional Head. If a CRU employee or volunteer is accused, the Executive Director should be contacted directly.

## 4. RECORD

As soon as possible, record the incident or disclosure of suspected risk or harm, noting what you observed or heard the child say. Keep this document in a safe place and send a copy to [childprotection@cru.edu.au](mailto:childprotection@cru.edu.au)

## REMEMBER

- If you are unsure whether or not to report, talk to your Camp Director, Site Director or Divisional Head.
- Don't start an investigation to try to prove the disclosure.
- Don't ask leading questions.
- Don't ask them to tell the story more times than is absolutely necessary.
- Don't promise that the abuse will discontinue, but reassure them you are here to support them.
- Don't repeat the story to anyone else unless advised to by the Camp Director or relevant CRU Divisional Head.
- Don't do anything that would alert the person(s) accused.
- Don't speak or make comment to the media or other persons asking for information.

If the allegation of reportable conduct is against a CRU worker, further investigation needs to be done by CRU, after the Police and Community Services have completed their investigations as necessary.

CRU is committed to conducting a thorough, timely, unbiased and pastorally appropriate investigation into allegations of reportable conduct. Any person who is the subject of an allegation will be suspended, from some or all duties, until the investigation is complete.

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## APPENDIX 4: Child Protection Training Guidelines

### Child Protection Training Guidelines for CRU Leaders

(NB: These guidelines are in addition to CRU's Child Protection Overview.)

#### Understanding child abuse:

Child abuse can take many forms. Children may be harmed by *verbal* and/or *physical* actions. They may also be harmed by people failing to provide them with basic care. Child abuse can be broken up into six distinct categories:

- **Sexual abuse:** any sexual act or sexual threat imposed on a child, including suggestive behaviour and inappropriate touching.
- **Physical abuse:** non-accidental injury and/or harm to a child or an injury caused by excessive discipline.
- **Emotional and psychological harm:** behaviours that may psychologically harm a child, including severe verbal abuse and threats of abuse or excessive and unreasonable demands.
- **Neglect or relinquishing care:** where a child is harmed by the failure to provide the child with the basic necessities of life, such as nutrition, hygiene/clothing, supervision, shelter, medical and mental health care, or schooling/education; or a parent/carer states they will not or cannot continue to provide care for a child.
- **Danger to self or others:** a child is a danger to themselves or others, including suicide or self-harming behaviour, and the parent/carer is unwilling or unable to provide appropriate support.
- **Carer concern involving domestic violence, substance abuse or mental health concerns:** where the child is a witness to any form of abusive behaviour used to gain control and maintain control over another person in the family unit, or where a child is significantly affected by the mental health or substance abuse of a parent/carer.

Fuller definitions can be found in NSW Mandatory Reporter Guide: <https://reporter.childstory.nsw.gov.au/s/mrg>

#### The effect of child abuse and neglect on a child:

Child abuse and neglect can have serious effects on children and can shape their later life experiences. An accumulation of risk factors places children at greater risk of harm. These could include:

- Age or disability - younger children or those with a disability are at greater risk because they are more vulnerable.
- Severity and frequency - the more frequently and severely a child is abused, the more damaging it will be for the child.
- Relationships with adults - abuse by parents is particularly damaging because the child often has no one else to turn to for support and comfort.
- Community's response - if the family is isolated from the community, or the community does not speak out against child abuse and neglect, this increases the risk to the child.

#### Some indicators of child abuse:

It may be possible that a child/relative may actually tell of the abuse or the child, referring to someone else being abused, may be him/herself being abused.

#### Sexual Abuse

- Age-inappropriate sexual behaviour and sexually explicit language, descriptions and drawings
- Depression, suicide attempts/self-harmful behaviour and poor self-care/personal hygiene
- Bruising or bleeding to breasts, buttocks, abdomen, thighs or genital area
- Presence of one or more STIs
- Anorexia/over-eating
- Adolescent pregnancy
- Unusual aversion to physical contact or inappropriate friendship expressions with adults
- Known exposure to pornography/being used for pornographic purposes

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**Physical Abuse** (inflicted intentionally or an inadvertent consequence of punishment)

- Unexplained bruising, particularly in the face, head or neck region, and bruising showing the shape of the object that caused it
- Multiple bruising or injuries (old and new) e.g. burns, scalds, sprains, dislocations or fractures
- Injury left untreated
- Differing versions of how injury occurred
- Drowsiness, vomiting, fits, retinal haemorrhages or abdominal pains
- Wearing clothes that do not match weather conditions to hide injuries
- Unusually afraid of physical contact with adults, or to the other extreme, overly friendly with strangers
- Does not display emotion when hurt or shows little fear when threatened
- Nightmares/bedwetting/going to bed fully clothed

**Emotional/Psychological Harm**

- Extreme attention seeking behaviour, disruptive or aggressive behaviour and bullying
- An inability to relate well with adult and/or children
- Overly passive behaviours and/or a high level of distrust of other people
- Drawings or writings that are violent
- Extreme reactions to discipline and criticism

**Neglect or Relinquishing Care**

- Begging, stealing or gorging on available food
- Acts of vandalism and abuse
- Poor self-care/hygiene, pale, thin, poor hair texture, untreated health conditions
- Regularly tired, hungry, withdrawn, miserable and/or irritable
- Inappropriate dress for weather conditions
- Extreme desire for adult attention and anxiety about abandonment
- Self-comforting behaviours such as rocking, sucking, sleeping curled up

**Danger to Self or Others**

- Scars or marks on the body suggesting previous cutting, burning or hitting
- Avoiding situations where the arms or legs are exposed
- Strange excuses for injuries
- Changes in mood
- Participating in risky behaviours
- Withdrawing from usual activities
- Being secretive

**Exposure to Domestic Violence, Substance Abuse or Mental Health Concerns for the Carer**

- Anxiety, symptoms of depression, low self-esteem, emotional distress
- Hypervigilance and/or oversensitivity to surroundings
- Aggressive behaviours
- An unhealthy focus on having control of their own circumstances and the behaviours of others
- Phobias, insomnia and physical complaints
- Reduced social and/or academic competence including poor empathy

**The presence of one indicator does not necessarily suggest that a child is the subject of abuse. Common sense should be used when reporting an indicator of child abuse.**

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NB: staff and volunteers should also be aware of, and vigilant in responding to other types of abuse including camper-camper bullying, sexual grooming by adults and spiritual abuse from leaders pressuring children or making them feel excessively guilty.

**Reportable conduct – as defined in the Children’s Guardian Act NSW 2019 – is:**

- a) any sexual offence, or sexual misconduct, committed against, with or in the presence of a child (including a child pornography offence).
- b) any assault, ill-treatment or neglect of a child.
- c) any behaviour that causes psychological harm to a child – even if the child consented to the behaviour.
- d) a failure to take reasonable steps to reduce the risk of a child becoming a victim of child abuse, or a failure to report child abuse of which they knew or reasonably ought to have known; regardless of whether a child has consented to the conduct.

**Reportable conduct does not extend to:**

- a) conduct that is reasonable for the purposes of the discipline, management or care of children. The age, maturity, health or other characteristics of the children and any relevant codes of conduct/standards should be considered.
- b) the use of physical force that considering circumstances, is trivial or negligible. (this does not imply that these matters should not be investigated for compliance with other standards).
- c) other conduct considered exempt includes:
  - i. Touching a non-intimate part of the child’s body in order to attract attention, to guide, or to comfort a distressed child
  - ii. Raising your voice to restore order
  - iii. Conduct established as accidental
  - iv. Provision of medical care (First Aid)
  - v. Not providing supervision for a short period of time with good reason when the risk of harm was reasonable or perceived as low
  - vi. Appropriate physical contact in sports, games, activities, etc.

**Accountability:**

- Never be alone with a camper in a solitary place, or in a room, or in darkness. Try not to separate yourself and a camper from the line of sight of other people. If you are in a conversation with a child, ensure that it is in an open place near others. Preferably, you would invite another leader to join the conversation or talk to more than one young person at a time.
- If a camper approaches you and wants to talk to you privately about a matter, do so in an open area in sight of other leaders. Ideally, advise another leader of the camper’s request and ask them to stay within sight while you have the discussion. If the camper becomes emotional, indicate for another leader to come and support you in dealing with the camper.

**Physical contact:**

- Physical contact can be initiated by the camper or occur with their permission. Avoid any physical contact that is provocative, sexually suggestive, or that may be construed as sexually suggestive. Children and teenagers may or may not be aware of creating such situations. It is your responsibility to be alert for such situations and to cease any inappropriate physical contact immediately. If contact is likely to occur, it is advisable to have another adult present and the camper’s permission as the circumstances allow. Other appropriate forms of contact include ‘high fives’, handshake, upper arm or upper back contact, shoulders, open hugs.
- If you inadvertently touch another person in a way which could be considered inappropriate, acknowledge the contact and apologise immediately and then inform the camp director as soon as is possible.

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- Avoid kisses and hugs if possible, but please note:
  - It is common for a camper to want to hug a leader at the end of camp. In this case, we advise to use a '3 pat side hug'. This involves turning slightly sideways so that the hug is not fully front to front, pat the camper's back 3 times and release. In most cases, the camper will recognise that you have finished the hug.
  - Occasionally a distressed camper will need a hug for comfort. In this case it is probably neglectful not to do so.

### Identification:

- All CRU-authorized personnel are to wear CRU ID. This includes: CRU wristbands, staff uniforms or lanyards with Photo ID. Be cautious of strangers. Any strangers on site should be asked to identify themselves and the purpose of their visit. If you are dissatisfied with their response, refer it to the camp director or site manager.

### Language:

- Adopt encouraging and positive language when talking to a camper or when in the presence of a camper. It is against CRU policy to use aggressive or derogatory language. Such language can intimidate and manipulate a child or young person and is inappropriate for a Christian leader.

### Cabins/bathrooms:

- Leaders should not normally sleep in the same cabins as campers. In recent times and in light of the recent Royal Commission, this topic is more in the minds of parents than ever and we want to stay above reproach.
- When entering a cabin or a changeroom/bathroom knock or announce that you will be coming in. Do not isolate yourself and a camper from others in the cabin.
- When working with young persons of the opposite gender, in addition:
  - Never be involved in their toileting or ablutions; and
  - Never be in their bathroom or bedroom, unless invited and accompanied by a leader of the same gender as the young person(s).

### Dress:

Be aware of and sensitive to the effect of your clothing and dress appropriate.

### Transporting Campers:

If required for medical centre trips or in other circumstances, any transporting of campers should usually be done with at least 2 leaders in a reliable and registered car driven by a fully licenced driver. At least one leader should ideally be the same gender as the camper where possible. There may be exceptions to this – for example in the case of an emergency. For further details, refer to the *Transporting Campers in Vehicles* policy.

### Privacy:

Camp folders, surveys (including statements about religious beliefs), and camper lists such as medical information and special diet reports, should NOT be left out in publicly accessible locations such as a dining hall table, kitchen bench. These are to be kept confidential by the camp director and shared only amongst leaders on a need-to-know basis.

### Photographs/Videos:

There are significant legal consequences related to inappropriate taking and use of photos and videos on camps. Photos and videos of campers are permitted to be used for CRU promotional purposes; however, the following considerations and restrictions apply:

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1. **On camp photos/videos are permitted:** Photographs/videos taken by designated person(s) during camp are fine to use for on-camp purposes such as slideshows, highlight reels, video edits etc. Restrictions apply in relation to publications outside of camp use.
2. **Permission must be obtained for any publications:** Permission must be obtained from a suitable authority in the relevant school, parents or guardians before identifiable photos/videos of minors can be published in either online or offline publications. For most holiday camp campers their parents will have agreed permission in the terms and conditions but there is an option to opt-out. These children will be identified in the director's folder notes.
3. **Some campers are restricted from all photo/video publications:** This includes opt-outs and all Children under the care of the Minister for Community Services unless explicit written permission has been granted by an authorised representative of the Minister. These campers will be known to the director and listed in the director's camp folder notes. Any photos/videos supplied to CRU at the end of camp should not contain any of these children.
4. **Campers' use of cameras is discouraged and banned in some circumstances:** CRU Campers should be discouraged from photographing, filming and uploading media (of themselves or others) and this must be strictly banned in cabins and bathrooms. This is particularly important in relation to restricted campers mentioned above.
5. **Uploading photos to the specified internet/social media sites only:** CRU Camp volunteers and campers may only upload photos to a CRU Camps approved camp gallery, group or cloud storage service. No other uploading or sharing on other websites or social media is permitted, including for camp activities such as photo rallies.
6. **Deleting all photos and videos post camp:** Volunteers are encouraged to share good quality camp photos and videos with CRU Camps staff for use in marketing and fundraising material. However all photos and videos should be deleted from phones/SD cards/computers/etc after this is completed.

**Any inappropriate or sexually explicit photographs or video must be reported to the camp director and the Director of CRU Holiday Camps immediately.**

### Communication After Camp:

- One of the strengths of CRU's ministry is that it is highly relational. Through the sharing of the lives of both voluntary leaders and permanent staff, thousands of students at school and campers on CRU Camps are impacted for the glory of God and the growth of His Kingdom.
- Trust between students/campers and volunteers/staff is essential for the effectiveness of relational ministry. It's important that we respect the trust given to us by being above reproach in our conduct with students and campers before, during and after our programs, and that we are also able to account for our actions.
- Inherent to relational ministries such as these, however, are risks of inappropriate behaviour, and perceptions or allegations of inappropriate behaviour. CRU must comply carefully with child protection legislation to ensure we are above reproach in every ministry context.
- To ensure we are above reproach in our actions during follow up, volunteers and staff should exercise caution when engaging in communication with campers. The following table outlines the types of communication that are appropriate for various ages.

### Off Program Policy – Summary

	School Years K–6	Years 7–10	Years 11–12	Approved junior leaders*
Online CRU Camp Group	✓	✓	✓	✓
Website comments & blogs	✓	✓	✓	✓
Letters to whole class groups (CEC)	✓ <i>Should be sent in bulk to the teacher from the camp director</i>	n/a	n/a	n/a

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	School Years K–6	Years 7–10	Years 11–12	Approved junior leaders*
Letters in the mail	! <i>With written parental permission following introductory letter</i>	♀ ♂ <i>Parent notified with introductory letter</i>	✓	✓
Emailing individuals	! <i>With written parental permission following introductory letter</i>	♀ ♂ <i>Parent notified with introductory letter</i>	♀ ♂	✓
In Person	! <i>Only group contexts for Church/School/Christian/approved CRU events &amp; with parental permission (or school permission if applicable)</i>		! <i>Only in group contexts</i>	♀ ♂ <i>In group contexts wherever practicable</i>
Phone/video calls	! <i>Only in relation to a CRU event</i>		♀ ♂ <i>Event related or after another form of contact</i>	✓
Social Media: public spaces	✘	! <i>Must be aged 13+</i>	✓	✓
Social Media: friend/follower	✘	♀ ♂	♀ ♂	✓
1-to-1 messaging (eg: social medial private chat, text messages, etc.)	✘	♀ ♂ <i>Limit and steer towards group messaging (eg: add another adult into the conversation)</i>	♀ ♂ <i>Limit and steer towards group messaging (eg: add another adult into the conversation)</i>	♀ ♂ <i>Unless camp/event/ministry related; group messaging is preferred</i>
Group chat (eg: social media, WhatsApps, etc.)	✘	✓	✓	✓
Untraceable contact/messaging	✘ <i>Don't delete messages, and don't use apps that delete messages</i>			
Photo/video content & sharing	! Staff, volunteers and campers may only upload photos/videos to approved galleries, groups or cloud storage service and not to personal social media pages or any other public site/platform. <ul style="list-style-type: none"> <li>• <i>CRU Holiday Camps – refer to procedure: Photography and filming on CRU Camps by campers and leaders.</i></li> <li>• <i>CRU Educational Camps and Schools Ministry – No video or photos should be uploaded to these groups/pages without the permission of the relevant Divisional Director. No photos where individual children can be identified are to be uploaded without parental permission.</i></li> </ul>			

<b>Key:</b>	
✓	= Permitted
✘	= Not permitted
♀ ♂	= Permitted with students of the same gender as the leader
!	= Permitted with specific restrictions, as outlined in the detailed guidelines
*	= A junior leader is 'approved' once their parent/guardian has been sent the 'Junior leader letter to parents'

**NB: Reasonable efforts must be made to store and not delete any form of correspondence.**

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## Example Scenarios

### Responding to specific incidents involving CAMPERS:

EXAMPLE INCIDENT	APPROPRIATE ACTION
<p style="text-align: center;"><b>A</b></p> <p>A camper approaches you in tears claiming that their life is in a 'mess' and they need someone to talk to about it. They indicate it is a private matter and request that you go to a private place to talk. They request complete confidentiality. During your discussion, they inform you that they have been sexually abused by a family member.</p>	<p><b>Leader:</b></p> <ul style="list-style-type: none"> <li>• You verbally comfort the camper and assure them that you will listen to them but that you can't promise complete confidentiality since you may be legally obliged to inform the Camp Director in the interest of the camper's own safety.</li> <li>• You respect the camper's need for a 'private place' to talk, <b>but</b> ensure that you are in complete view of at least one other leader at all times.</li> <li>• You must be careful in the use of any physical comfort actions such as a hug or wiping tears from the camper's face. Comforting a child with a hug might be completely appropriate in one context but not in another. For instance, a brief 'arm around the shoulder' could be interpreted by the child as caring support on your part but a lingering 'arm around the shoulder' for the duration of counselling might be interpreted very differently and would not be wise.</li> <li>• If the camper discloses information of abuse of any kind you: <ul style="list-style-type: none"> <li>○ Counsel the camper as far as you feel capable and comfortable. This could include reassurance that what has happened is definitely not their fault and that what has happened to them does not affect God's love for them in any way.</li> <li>○ Inform the camper that you will need to inform the camp director who will know what to do with the information but that you won't speak with anyone else on camp.</li> <li>○ Offer to pray with the camper.</li> <li>○ Encourage them to continue to join in on the activities.</li> <li>○ Avoid surreptitiously providing information to other leaders during 'prayer times'.</li> </ul> </li> <li>• Report the matter to the camp director.</li> <li>• Maintain confidentiality unless required to report further to the camp director or Divisional Director (eg: Director of Holiday Camps).</li> </ul> <p><b>Camp Director:</b></p> <ul style="list-style-type: none"> <li>• Report the incident to the Divisional Director</li> <li>• Seek the Divisional Director's advice for the best way to support both the child and the leader while on camp.</li> </ul>

EXAMPLE INCIDENT	APPROPRIATE ACTION
<p style="text-align: center;"><b>B</b></p> <p>A camper shows interest in you by sitting at your table at meal times. As camp progresses, this camper always requests to be in your group for activities and will find any excuse to touch you. On the third day of camp, the camper comes up behind you and gives you a hug.</p>	<p><b>Leader:</b></p> <ul style="list-style-type: none"> <li>• You back away from the camper and request in a stern, but kind, voice for the camper not to do that.</li> <li>• You inform the director, and a leader of the same gender as the camper, of the incident.</li> <li>• You request the director and leader of the same gender to speak to the camper at an appropriate time.</li> <li>• You distance yourself as much as possible from the camper during meal times and activities and request another leader of the same gender to watch the camper more closely.</li> </ul> <p><b>Camp Director:</b></p> <ul style="list-style-type: none"> <li>• Counsel the camper (with a leader of the same gender present) of the inappropriateness of their behaviour.</li> <li>• Monitor the situation and intervene further if necessary.</li> </ul>

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## Responding to specific incidents involving LEADERS:

EXAMPLE INCIDENT	APPROPRIATE ACTION
<p><b>C</b></p> <p>On a CRU Study Camp, a female leader on camp continuously referred to one boy as 'gorgeous', would run her fingers through his hair and would appear to be continually hanging around him.</p>	<p>This behaviour is clearly not appropriate. While the male camper concerned may or may not be offended (he may even enjoy the attention), disciplinary action needs to be taken against the offending leader to ensure that the boy is not subjected to this kind of behaviour in the future. While this conduct is not appropriate for any CRU leader, it probably does not fall into a category that the Director of Holiday Camps would need to report to the Children's Guardian.</p> <p><b>Witnessing Leader:</b></p> <ul style="list-style-type: none"> <li>• Check in with the camper to see if he is ok, and inform the camp director if he isn't.</li> <li>• Speak to the offending leader directly if you feel comfortable.</li> <li>• Report your observations and concerns to the director of the camp.</li> <li>• If the director does not agree with your observations or concerns or fails to take reasonable action, you should call the Director of Holiday Camps directly.</li> </ul> <p><b>Camp Director:</b></p> <ul style="list-style-type: none"> <li>• If the leader has already been spoken to, monitor her change in behaviour in response to the counselling. If the leader hasn't already been spoken to, counsel her directly to change her behaviour.</li> <li>• Discuss the situation with the Director of Holiday Camps, who will decide with you if the leader needs to be removed from camp and also whether the camper's parents should be contacted.</li> </ul>

EXAMPLE INCIDENT	APPROPRIATE ACTION
<p><b>D</b></p> <p>On a CRU Holiday Camp during an activity, a leader gets annoyed at two children because they keep talking when instructions are being given. He grabs both children by the arm and pulls them out of the group and tells them to 'be quiet' and 'behave'. His grab is harder than he realizes and one child begins to cry. Bruises are left on the arm of that child.</p>	<p>This is clearly not appropriate. Although the leader may not have intended to harm the child, a degree of harm did occur which will require action. It may be necessary for the Director of Holiday Camps to report the incident.</p> <p><b>Witnessing Leader:</b></p> <ul style="list-style-type: none"> <li>• Attend to the needs of the child.</li> <li>• Report the incident to the director of the camp detailing the exact sequence of events.</li> <li>• If the director does not agree with your observations or concerns or fails to take reasonable action, you should call the Director of Holiday Camps directly.</li> </ul> <p><b>Camp Director:</b></p> <ul style="list-style-type: none"> <li>• Suspend the offending leader from camp activities until advice can be sought from the Director of Holiday Camps.</li> </ul>

EXAMPLE INCIDENT	APPROPRIATE ACTION
<p><b>E</b></p> <p>After camp, you notice a leader is friends with and/or a follower of a camper of the opposite gender on social media.</p>	<p>This could be a violation of our Off Program Contact Policy.</p> <p><b>Witnessing Leader:</b></p> <ul style="list-style-type: none"> <li>• If you have an opportunity and feel comfortable, raise the matter with the leader. They may have a pre-existing relationship which allows social media contact.</li> <li>• If you are uncomfortable raising the issue with the leader or dissatisfied with their response, raise your concerns with the relevant Divisional Director.</li> </ul>

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EXAMPLE INCIDENT	APPROPRIATE ACTION
<p><b>F</b></p> <p>On a CRU Holiday Camp, one of the campers has a learning disability and takes a longer time to fully understand instructions given by a leader. A leader becomes frustrated with the camper and yells 'you're useless' in front of other campers.</p>	<p>The concern here is that the verbal abuse could cause emotional distress on the camper. A Christ like model of patience and love has certainly not been displayed.</p> <p><b>Witnessing Leader:</b></p> <ul style="list-style-type: none"> <li>Attend to the needs of the camper.</li> <li>Speak to the offending leader directly if you feel comfortable and</li> <li>Report the incident to the camp director.</li> </ul> <p><b>Camp Director:</b></p> <ul style="list-style-type: none"> <li>Counsel the offending leader that their behaviour is inappropriate.</li> <li>Suggest alternative ways for the leader to handle the situation.</li> <li>Encourage the leader to apologise to the camper concerned and other witnessing campers.</li> <li>The offending leader's response to counselling will determine whether he remains on camp.</li> <li>Report the incident to the Director of Holiday Camps.</li> </ul>

### Scenarios involving site staff:

EXAMPLE INCIDENT	APPROPRIATE ACTION
<p><b>G</b></p> <p>A male site-staff worker walks past a room where a girl is changing while the curtains are open. They both see each other and the girl responds with embarrassment.</p>	<p><b>Site staff worker:</b></p> <ul style="list-style-type: none"> <li>Apologise and vacate the area immediately.</li> <li>Inform the camp director.</li> </ul> <p><b>Camp Director (if Summit Camp):</b></p> <ul style="list-style-type: none"> <li>Inform supervising Teacher.</li> <li>Report details on an incident form</li> </ul> <p><b>Camp Director (if Holiday Camp):</b></p> <ul style="list-style-type: none"> <li>Report details on an incident form</li> </ul> <p>This might seem like over-reaction but if the girl makes a complaint and the incident hasn't been reported, the site staff worker will be held in suspicion. It is much better to pre-empt any suspicion by reporting all such incidents.</p>

EXAMPLE INCIDENT	APPROPRIATE ACTION
<p><b>H</b></p> <p>A cleaner is cleaning a cabin recently vacated by a group. One of the campers returns to try to find some lost article of clothing.</p>	<p><b>Cleaner</b></p> <p>The concern here is that the Cleaner has found themselves in a situation in which they are alone with a camper which is contrary to CRU's guidelines. The Cleaner should immediately vacate the area and only return to the room after the camper has left.</p> <p>If the Cleaner stays in the room with the camper, even if perfectly innocent, it exposes the Cleaner to the danger of false allegations being made by the camper which must be acted upon according to Child Protection Legislation.</p>

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## APPENDIX 5: Risk of Harm/Child Protection Allegation Report Form

### Crusader Union of Australia Risk of Harm/Child Protection Allegation Report Form (version 2.1)

From time to time, a child will disclose an incident where they have been harmed. This is a significant event, particularly for the child, and needs to be handled in a way that protects the child and allows for action to be taken. If you are the person that a child discloses to, don't panic. The best thing you can do is listen, and reassure the child that it was not their fault and that they have done the right thing by talking to you about it. Disclosing is a big thing for a child and it may occur a long time after the abuse happens. Allow the child or young person to speak freely and disclose as much or as little as they would like. Remember, you are not an investigator and you do not need to delve into the situation. Remain calm, listen carefully and non-judgementally, and record all you hear as soon as possible after the conversation.

CRU takes child protection seriously. Child abuse comes in various forms – sexual abuse, physical abuse, emotional abuse, psychological abuse, neglect and exposure to domestic violence. As a CRU worker (i.e.: CRU volunteer or staff member), you are expected to report when a child discloses that they have been harmed or are at risk of harm, or when another person informs you that a child has been harmed or is at risk of harm. You may also have reason to believe, by a child's behaviour or something else that you have seen or heard (such as bruises seen in unusual places, sexualised behaviours that are inappropriate for a child's age, etc.), that a child has been abused – this must also be reported.

Helpful additional information can be found at:

<https://www.facs.nsw.gov.au/families/Protecting-kids/reporting-child-at-risk/harm-and-neglect>

Please note:

- **THE DIVISIONAL DIRECTOR MUST BE CONTACTED IMMEDIATELY, AS PER THE CHILD PROTECTION POLICY REPORTING GUIDELINES**
- **THIS FORM IS TO BE FILLED IN BY THE PRIMARY LEADER INVOLVED WITHIN 24 HOURS OF A DISCLOSURE.**
- **THIS FORM IS TO BE COMPLETED IN CONSULTATION WITH THE CAMP DIRECTOR (unless the allegations have been made against them).**

#### Disclosures - “Dos and Don'ts” – for workers

##### Dos:

- Do listen ... do not add anything to what the child says (you will need to write down, as much as is possible, word-for-word what the child says). Recall as much detail as you can about who, where, when, etc. Be careful to not prompt for excessive amounts of detail, but capture as much as you can.
- Do reassure ... the child that they have done the right thing in speaking to you.
- Do inform ... the child that you need to tell people who may try to help them. (Make no promises, as the sad reality is that this information may not be responded to by FACS). Reassure them that you will not tell anyone who does not need to know.
- Do ensure ... that the child is not in immediate danger.

##### Don'ts:

- Don't start an investigation into the situation. Do not ask leading questions, where you could be tainting evidence.
- Don't promise the child that the abuse will stop.
- Don't promise to keep the information a secret. You are obliged to report it, and doing this will break the child's trust if you have promised to not tell anyone.
- Don't tell anyone who does not need to know.

#### GENERAL INFORMATION

Camp name			
Camp dates		Camp location	
Person making report		Camp director	

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DETAILS ABOUT THE CHILD OR YOUNG PERSON HARMED OR AT RISK OF HARM			
Child/young person's name			
Date of birth		Age or approximate age	
Gender	<input type="checkbox"/> Male	<input type="checkbox"/> Female	<input type="checkbox"/> Not known <input type="checkbox"/> Other
Known disability issues			
Current whereabouts of child/young person			
Are any other children/young people involved in this report?	<input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, please provide details:</i>		
ADDITIONAL INFORMATION IF KNOWN (may be required if reporting to FACS)			
Home address			
Name(s) of parent(s)			
Name(s) of sibling(s)			
Is English spoken as a second language?	<input type="checkbox"/> No <input type="checkbox"/> Yes →	If English is a second language, please identify the language(s) spoken at home	
Is it likely that a child involved will require an interpreter?	<input type="checkbox"/> No <input type="checkbox"/> Yes	Is the child an Aboriginal or Torres Strait Islander?	<input type="checkbox"/> No <input type="checkbox"/> Yes
RISK OF HARM / ALLEGATION / DISCLOSURE INFORMATION			
<p>Please provide FULL details of the allegation/disclosure. You will need to include:</p> <ul style="list-style-type: none"> <li>• A full transcript of all conversations (including any follow up conversations)</li> <li>• Where were you at the time of the conversation?</li> <li>• Who else was present in the conversation?</li> <li>• What was the child's emotional/mental/behavioural state at the time?</li> <li>• Where is the child now and what has been told to them in regards to the next steps?</li> </ul> <p>Please provide only facts and observations, without making assumptions or jumping to conclusions or making "value" judgments.</p> <p><i>(You will likely need to attach additional pages to document all the details required.)</i></p>			

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**LEADER'S OBSERVATIONS**  
**How is the child experiencing the suspected or actual harm?**

Are your concerns about the child or young person's harm (or risk of harm) due to their appearance and/or behaviour? If so, what have you observed?	
Did the events disclosed or observed result in: <ul style="list-style-type: none"> <li>• A physical injury to a child/young person? <input type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>• Medical attention or treatment? <input type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>• Any kind of psychological or emotional harm? <input type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>• Sexual harm? <input type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>• Neglect? <input type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>• Any kind of harm (as above) to another person? <input type="checkbox"/> Yes <input type="checkbox"/> No</li> </ul> If you have answered yes to any of the above, please note what you have observed and/or heard in as much detail as possible:	
Is the child in immediate danger (e.g.: about to go home to danger)?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide details:

**OTHER INFORMATION**  
(To be completed at the time this report is first compiled; any future contact will be documented separately by CRU's Divisional Head.)

Is the child or young person aware that this report has been made? <input type="checkbox"/> Yes <input type="checkbox"/> No Are the parents aware that this report has been made? <input type="checkbox"/> Yes <input type="checkbox"/> No Do you consent for your identifying information to be provided to NSW Department of Family and Community Services (FACS), JCPR (Joint Child Protection Response Program), and/or NSW Police in the event that a child protection report is made? <input type="checkbox"/> Yes <input type="checkbox"/> No Have the police already been contacted by you about this report? <input type="checkbox"/> Yes <input type="checkbox"/> No
NB: If the report is referred to NSW Police, the same protections and confidentiality relating to your identity will continue to apply as per Section 29 of the <i>Children and Young Persons (Care and Protection) Act 1998</i> .

**DETAILS ABOUT THOSE MAKING THE REPORT**

<input type="checkbox"/> By checking this box, I agree that this is a true and accurate record of events and actions.			
Report prepared by	Name:	Signature:	
	Phone no.:	Date & time:	
Witnessed by <small>(typically the camp director)</small>	Name:	Signature:	
	Phone no.:	Date & time:	
Name/s of other leaders involved		Nature of involvement	

**THIS REPORT MUST BE SENT IMMEDIATELY AND CONFIDENTIALLY TO THE CRU DIVISIONAL DIRECTOR (or Executive Director if a leader or staff member is accused).**

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OFFICE USE: FACS REPORTING & ADDITIONAL FOLLOW UP					
MANDATORY REPORTER GUIDE (MRG) INFORMATION					
Was an MRG Decision Tree completed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If yes, complete the remainder of this section)</i>			MRG Decision Tree outcome	
MRG completed by				Date submitted	
CHILDSTORY REPORTER/CHILD PROTECTION HELPLINE INFORMATION					
Was a ChildStory eReport completed (or the Child Protection Helpline called)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If yes, please complete the remainder of this section)</i>				
Submitted by				Date submitted	
Engagement ID			Final FACS outcome <i>(active or closed)</i>		
			Date final outcome notification received		
ADDITIONAL ACTION TAKEN (if applicable)					
Additional follow up actions taken					

**NB: Any and all MRG outcomes, ChildStory eReports and FACS correspondence (such as screenshots & emails) must be printed and attached to this form, or must be saved electronically and filed in the same folder as this report if stored electronically.**

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## **APPENDIX 6: Principles of Investigation**

CRU is committed to conducting a thorough, timely, unbiased and pastorally appropriate investigation into allegations of reportable conduct. CRU will be directed by the investigation process steps required by the Children’s Guardian, and will be guided by the following principles:

### **1. Avoiding Conflict of Interest and Appointment of Investigator**

All investigations must be conducted in an impartial, independent and objective manner and be open and transparent. The investigator must not show bias or favour to the alleged victim(s), the person who is the subject of the allegation, nor in outcomes which might affect the reputations of CRU and/or associated entities.

To achieve this, in some instances the Head of Relevant Entity may call on an external expert to undertake the investigation.

### **2. Confidentiality**

The Head of Relevant Entity and persons conducting investigations should maintain a high level of confidentiality throughout the investigation phase.

The worker also should not discuss the allegations with others involved (e.g.: students, campers, parents or other workers) without the approval of the Executive Director.

### **3. Procedural Fairness and Natural Justice**

All investigations will follow a fair and unprejudiced process that respects both the person making the allegation and the worker who is the subject of the allegation.

A proper investigation usually requires that a worker against whom an allegation has been made, be told promptly the substance of the allegation and be given the right to reply to the allegation.

If DCJ or police are investigating the allegation, advice should be received from them about when to inform the worker about details of the allegation. In this case, CRU will not commence and investigation until clearance to do so is given. Otherwise, the decision of when to inform the worker will depend on the protection of notifiers and witnesses, the quality of evidence to be obtained and the possibility of prejudicing the conduct of the investigation.

Where possible, the worker should be given advance notice of an interview with the Head of Relevant Entity or an appointed investigator, and details of the allegation, providing sufficient time to allow them to respond. They will also typically be advised that they may have a support person at the interview.

Throughout the investigation, careful records of interviews (audio or in writing) will be kept.

### **4. Carefully considered findings**

At the conclusion of the investigation, the investigator will make a preliminary finding that is based upon the evidence gathered during the investigative process.

The worker will be told of the preliminary finding and given an opportunity to respond, typically in writing, prior to the final finding being completed.

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## **5. Appropriate Disciplinary Proceedings**

Disciplinary proceedings are defined as the action taken as a consequence of the findings arising out of the investigation. When conducting disciplinary proceedings CRU will have regard to procedural fairness. This will usually involve:

- a. giving the worker details of the final finding;
- b. informing the worker of the possible action that CRU may take; and
- c. giving the worker a right to respond including, if they wish, in writing.

If the investigation results in the finding that sexual misconduct or serious physical assault occurred, CRU is required to report this to the Office of the Children’s Guardian.

## **6. Right of Appeal**

The worker is entitled to make a complaint with either CRU’s Executive Director or the Chair of the Board if they believe the investigation was unfair, biased, incomplete or suffered some other deficiency giving rise to an incorrect finding.

If they are unsatisfied with CRU’s response, they are able to make a complaint to the Children’s Guardian.

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## APPENDIX 7: Procedure for CRU West

For CRU West, the principles outlined in CRU’s Child Protection Policy apply in WA, however the legislative framework and some of the procedural details differ. Below is an overview of the legislative requirements, along with an outline of the CRU West processes for screening workers, reporting suspected or potential child abuse, and responding to allegations made against CRU West workers.

### LEGAL REQUIREMENTS

CRU West is covered by the following relevant legislation and seeks to comply with each Act:

Legislation	Focus	Status
Working with Children (Criminal Record Checking) Act 2004 (WA)	Child-related worker screening → Department of Communities	Must comply
Children and Community Services Act 2004 (WA)	Child or young person at risk of significant harm → Department of Communities	CRU workers will act as a ‘mandatory reporters’
Parliamentary Commissioner Amendment (Reportable Conduct) Act 2022 (WA)	Allegations of ‘ <b>reportable conduct</b> ’ against workers → Ombudsman Western Australia office (OWA)	CRU is classified as a “ <b>relevant entity</b> ”

### SAFE MINISTRY PROCESSES

#### 1. Screening Workers

Prior to engaging in child-related work in WA, all workers are required to:

- i. Provide details of a church leader who can act as a referee and, among other things, must declare them to be fit to work with children;
- ii. Hold a current CRU Child Protection Training Certificate (which expires every 3 years);
- iii. Have signed the CRU Child Protection Code of Conduct (which is re-signed every time the Child Protection Training Certificate is undertaken); &
- iv. Have and provide a photo of a valid WA Working with Children Check.

*NB: in WA, workers are permitted to engage in child-related work once they have applied for a WA Working with Children Check. In this instance, they must provide CRU proof of this application. If a WA Working with Children Check card is not issued and/or a photo of this card is not provided to CRU within 6 weeks of the application being made, then CRU’s Executive Director must be advised.*

For CRU West camps, typically the Volunteers’ Coordinator for CRU Holiday Camps will follow up camp leaders prior to camp so that all four requirements are in place prior to camp; however, it is the Director of CRU West’s responsibility to ensure that no person leads on camp unless all four requirements have been met.

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In processing each WA Working with Children Check, we will:

- a) Keep on file a photo of each person's Working with Children Check card, which must be current during any period in which they are working with children;
- b) Check the validity of each card when it is provided, taking and filing a screenshot of the validation; &
- c) Register each worker's details via: <https://workingwithchildren.wa.gov.au/employers-organisations/online-services/registeremployees>

## 2. Reporting Child Abuse

- Reporting to the Department of Communities

All instances where child abuse could be reasonably suspected to have occurred, be occurring, or to be likely to occur MUST be reported to the WA Department of Communities. Typically this will be reported following consultation with the Director of CRU West, Director of Ministries and/or Executive Director; however, urgent circumstances or situations where one of these people is the subject of the allegations may necessitate direct reporting to the Department of Communities. Details on how to make a report can be found at:

<https://www.dcp.wa.gov.au/ChildProtection/Pages/Ifyouareconcernedaboutachild.aspx>

- Reporting to the Police

When an allegation of abuse is disclosed, the alleged victim should be encouraged to report this to the police.

Additionally, we will be guided by the Department of Communities on whether an particular instance of alleged abuse should be directly reported to the police by us or not. Factors impacting whether alleged abuse is reported to police include whether there is an immediate danger, the advice of the Department of Communities (if their advice is for us to report it to police, then we MUST report to police), whether the Department of Communities indicates that they will make a police report and therefore we don't need to, and whether there is any potential for the alleged abuse to have reached a criminal threshold.

## 3. Responding to Allegations Made Against CRU Workers

Given the similarities between the NSW and WA reportable conduct schemes (noting that the WA scheme heavily drew on the NSW scheme when being developed), the process outlined in Appendix 6 of this attached policy will shape our course of action.

Under the WA reportable conduct scheme, the Ombudsman must be advised withing 7 business days of any allegation of reportable conduct.

An investigation must not move forward before the Police and the Department of Communities have been advised and have both given permission to move ahead.

More information about the WA scheme can be found at:

[https://www.ombudsman.wa.gov.au/Reportable\\_Conduct/Reportable\\_Conduct.htm](https://www.ombudsman.wa.gov.au/Reportable_Conduct/Reportable_Conduct.htm)

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