

COPTIC ORTHODOX CHURCH

✙ DIOCESE OF SYDNEY ✙
& AFFILIATED REGIONS

COPTIC ORTHODOX CHURCH SAFE PARISHES POLICY

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INTRODUCTION

Ministry to children and young people is vibrant and exciting work, and greatly significant to the life of the church. Teaching children and youth about our heritage and helping them to create a living bond with our Lord Jesus Christ is our mission. It is a service to the children and youth, the church family, and to God himself that offers great opportunities, but also carries significant responsibilities for the wellbeing of the children and young people in our care. If we, as a church, take the teaching and leadership of children and young people seriously then we must do all we can to provide an environment that is safe from any form of harm.

This Policy aims to provide appropriate guidelines to protect and care for children and vulnerable people. Understanding God starts from a young age, developing and growing safe relationships from the Lord's home being the Church. Teaching the word of the Lord is God's work and is not a task held lightly, it is a significant responsibility. We must all appreciate the leadership and mentorship required whilst serving our beloved children of each parish and use this policy as our bible for the way we serve. Furthermore, we must all work collaboratively to implement this plan and maintain a safe and respected environment in our church that is safe from any harm.

The Coptic Orthodox Church Diocese of Sydney and Affiliated regions (Coptic Orthodox Diocese of NSW) desires to keep its Parishes characterised by grace and forgiveness rather than rules and regulations, however in past events, not all Christian workers have protected young people. This policy has been developed so that as far as possible, such crimes will not be committed in future in the context of our church ministries. With the grace of God, this policy will help prevent future unfavorable events and keep the church safe.

Please note:

All references to children in this document refer to anyone under the age of 18. This does not apply when there is a particular age bracket or when a distinction is drawn between children and youth in this document.

Except where a particular age bracket is indicated, or a distinction is drawn between children and youth, references to children in this document are references to anyone under the age of 18.

Chapter One

REQUIREMENTS FOR PARISHES

1.1. Responsible Parish Priest

1.1.1. The responsibilities of the Responsible Parish Priest

The Responsible Parish Priest is responsible for making sure all ministry conducted throughout the parish is safe for children and young people. To faithfully execute his responsibilities regarding Safe Ministry the Parish Priest needs to:

A. Complete training - The Responsible Parish Priest must complete Safe Parishes training at the required intervals.

The Responsible Parish Priest must have satisfactorily completed Safe Parishes training within the last three years before beginning his work and must complete the training every three years.

B. Implement and appoint - The Responsible Parish Priest must implement the Safe Parishes Policy and must also appoint a Safe Parish Representative for the parish.

The Parish will:

- Commit to the safety and well-being of all Children or Young People who access any of our activities, programs, services, or facilities.
- Provide Children or Young People with positive and nurturing experiences.
- Support families and communities to promote Children or Young People's healthy development and well-being.
- Take action to ensure that Children or Young People are protected from harm by identifying and addressing risk factors as soon as practicable.
- Ensure that Children or Young People are not harmed during the time that they are involved with any of our activities, programs, services, or facilities.
- Ensure that Children or Young People have access to adequate support to promote safety and intervene early

All Parishes and Diocesan Organisations within the Coptic Orthodox Diocese of NSW and its affiliated regions must adopt this, Policy.

C. Comply - The Responsible Parish Priest must make sure the parish complies with its obligations under the *Child Protection (Working with Children) Act 2012 (NSW)*, as well as other relevant State legislation. Safe Parish Representative's job is to assist the Parish Priest with implementing such compliance.

- D. Meet** - The Parish Priest must meet regularly with the Safe Parish Representative to review the implementation of the Coptic Orthodox Diocese policies in the church.
- E. Monitor** - The Parish Priest (with the Safe Parish Representative) and Parish Council) must monitor all basic health and safety issues to avoid obvious hazards on church property, particularly in rooms used by children and vulnerable adults.
- F. Report** - The Responsible Parish Priest has obligations as a mandatory reporter as well obligations under the NSW Reportable Conduct scheme to report certain suspicions and allegations to the relevant authorities. (See chapter 3 for details).
- G. Fulfil** - The Responsible Parish Priest must fulfil such other responsibilities as required by the Clerical Council in Service in relation to standards for personal behaviour, the practice of pastoral ministry and ensuring the safety of children and all vulnerable people in all areas of parish life.

1.2. The Safe Parish Representative

The Responsible Parish Priest is required to appoint a Safe Parish Representative (with the agreement of Parish Council Although the ultimate responsibility for Coptic Orthodox Diocese of NSW, lies with the Responsible Parish Priest, he can delegate the day- to-day work of ensuring compliance with legal and diocesan requirements to the Safe Parish Representative.

1.2.1. Appointment of Safe Parish Representative (SPR)

The Safe Parish Representative (SPR) will report directly to the Safe Parishes Working Group (SPWG).

Responsibilities

The SPR is required to:

- Coordinate the Working with Childrens Check (WWCC) Register for the Parish.
- Complete and keep current Child Protection Training from an Accredited Provider.
- Brief and educate Parish Priests, Parish Servants and Parents on the Coptic Orthodox Diocese of NSW Child Safety Framework, Procedures, and Implementation Measures.
- Refer matters/consult with the Safe Parishes Working Group (SPWG) regarding child protection concerns in the Parish.

- Obtain resources to help with any training or sample procedures for reportable conduct.
- Promote a Safe Parish culture.

SPR required attributes:

- Be a servant appointed by the Parish Priest/s.
- Be able to communicate in English and Arabic languages.
- Interpret and apply Child Protection laws, legislations, and practices.
- Committed to participating in training and professional development, when required.
- Be sensitive to the Coptic Orthodox Faith.
- Possess outstanding communication and interpersonal skills.
- Hold a current Working with Children Check (WWCC).
- Deliver training/workshops to fellow servants and clergy as required (not mandatory).

He or she must not be bankrupt or otherwise incapable of acting in the capacity of Safe Parish Representative

Upon the appointment of a Safe Parish Representative, the Responsible Parish Priest must promptly notify The Safe Parish Working Group by email safeparish@coptic.org

1.2.2. The period of appointment

A Safe Parish Representative holds their position for the period of three (3) Years or (can be renewed or terminated at the discretion of the Responsible Parish Priest in writing at the time of their appointment, until a successor is appointed or until they resign (whichever comes earlier).

The Responsible Parish Priest may revoke the appointment of the Safe Parish Representative as he thinks fit and may appoint someone else to the role.

The appointment of a Safe Parish Representative may be revoked in circumstances where they have not completed Coptic Orthodox Diocese Training (within the last three years) or at any time in the discretion of the Responsible Parish Priest.

Where a Safe Parish Representative ceases to hold a WWCC clearance or holds a clearance that becomes subject to an interim bar, their appointment is revoked.

1.2.3. Duties of the Safe Parish Representative

These are the areas of responsibility a Safe Parish Representative has:

A. Assist the Responsible Parish Priest

The Responsible Parish Priest is responsible for making sure that the Parish complies with the current laws concerning child protection reporting including the NSW Working with Children Check (WWCC) requirements and complies with diocesan screening and training requirements. The Safe Parish Representative's role is to assist the Parish Priest in carrying this out. The legal and diocesan requirements are outlined further below.

B. Keep records

The Safe Parish Representative must keep records of all WWCC clearances, records of completion of training which the Board of Trustees or Safe Parishes Working Group deem necessary by people undertaking service to children in the Parish. It is essential that the Safe Parish Representative establish a reliable system or procedure to remind themselves of impending expiry dates of WWCC clearances and the dates Refresher training is required so that they can follow up on those matters with the Servants.

C. Monitor and report

The Safe Parish Representative must monitor and report on Coptic Orthodox Diocese systems and practices in the Parish.

D. Monitor

One of the ways that we can protect children in our churches is to make sure that they are meeting in a physical environment that is appropriate and safe for them.

Along with the Parish Priest and Parish Council, the Safe Parish Representative must monitor all basic health and safety issues to avoid obvious hazards on Parish property, particularly in rooms used by children and vulnerable adults.

E. Report abuse

The Safe Parish Representative must ensure that any child abuse that they become aware of is reported to the relevant authorities. Safe Parish Representative may become aware of abuse because they have observed indicators of abuse, another person has informed them of their concerns for a child or a child has told them that they are being abused.

1.3. Selection and Screening of Servants

Sadly, many children have been abused physically, sexually, and emotionally by trusted members of their communities, including people in churches. As a result, there are requirements for people involved in any kind of work with children that Servants must comply with, both under Federal and State Legislation and the Coptic Orthodox Diocese of NSW ordinances.

1.3.1. Legal requirements

Any person involved in **child-related services/work** (including all servants) must get a Working with Children Check clearance (subject to some exemptions). A child is defined as anyone under the age of 18 years and therefore child-related work includes ministry to youth. A church must verify the WWCC number with the NSW Office of the Children's Guardian prior to engaging a person in child-related services to determine whether the person has been cleared or barred.

Compliance with these legal requirements is the responsibility of the Parish Priest, although this task can be delegated to the Safe Parish Representative.

A failure to undertake screening as required by law could lead to significant fines. It may also potentially form the basis of an action in negligence if a child is abused by a person in child-related work in the parish who does not have a WWCC but has a record that would have resulted in a bar had the WWCC been undertaken.

Working With Children Checks

A. What is a Working with Children Check?

The NSW Working with Children Check (WWCC) is a government screening process overseen by the NSW Office of the Children's Guardian. Anyone intending to work with children in NSW, including volunteers, must get a WWCC. The WWCC involves a criminal history check (including convictions, charges, and juvenile records) and a review of findings of misconduct. The result is either a clearance to work with children for five years or a bar against working with children.

B. Who needs a WWCC?

A Working with Children Check is a prerequisite for anyone in paid or voluntary **child-related services/work**) in Australia.

“Child-related Services” is:

- Providing services for under 18’s;
- Where the work normally involves being face to face with children; and
- Where contact is more than incidental to the work

However, the general meaning is subject to several exemptions (including Workers/Servants who are under 18 years of age). For more information about who is exempt from a WWCC see below.

The **Responsible Parish Priest** and all **Workers/Servants** (who have face to face contact with children personally must have a WWCC clearance) as they are deemed to be undertaking child-related work where there are children in a congregation of the parish.

Any and every person engaged in child-related work in a parish must either:

- hold a Working with Children Check clearance that has been verified with the NSW Office of the Children’s Guardian and is not subject to a bar,
- have a current Working with Children Check application before the NSW Office of the Children’s Guardian, or
- be subject to an exemption.

C. When must a person apply for a WWCC?

A person must apply for a WWCC and receive a clearance, or they must have a current application for a clearance with the NSW Office of the Children’s Guardian and have provided proof of identity before engaging in any child- related services/work.

D. What is the process for obtaining a WWCC?

There are two steps in the process:

1. **Workers/Servants** must apply for a WWCC clearance, and
2. **The Safe Parish Representative** must verify that the Workers/Servants have a WWCC clearance.

Step 1: Applying for clearance

The Worker/ Servant (employee or volunteer) must:

- Fill out an online application at <https://ocg.nsw.gov.au>, or ring the Office of the Guardian, if internet access is not available.
- Receive their WWCC application number.
- Take the WWCC application number and proof of their identity to a Service NSW Centre or motor registry. There is no fee for volunteers, but if it is a paid position an application fee is payable.
- The applicant will then receive a WWCC clearance or bar by email (or post if there is no email address).

Most applications will be processed within 24 hours.

Step 2: Verification of the clearance

The Responsible Parish Priest must verify (via the Safe Parish Representative) that the Servant or volunteer has a WWCC clearance before engaging in child-related services/work by:

- logging into their employer account at: <https://ocg.nsw.gov.au>, and
- entering the following information:
 - *the applicant's name,*
 - *date of birth, and*
 - *WWCC clearance number or application number.*

E. What is the result of the WWCC?

There are only two outcomes of a WWCC: a clearance or a bar.

A **clearance** is valid for five years, and cleared applicants will be subject to ongoing monitoring. If an applicant is **barred**, it is an offence to engage the person in child-related work. If an applicant is barred, the Safe

Safe Parish Representative is to immediately advise the Responsible Parish Priest who must stop their involvement in all child-related work/services and notify the Safe Parishes Working Group.

F. What records must be kept?

For each worker in child-related work the parish must keep the following records (either electronic or hardcopy):

- Full name,
- Date of birth,
- WWCC number,
- Verification date (the date the parish verified them),
- Verification outcome (clearance or bar),
- Name of the person who did the verification,
- Expiry date (when the WWCC number expires),
- Status of the worker (paid or volunteer), and
- The type of service conducted.

G. Who is exempt from needing a WWCC?

A WWCC is not required where contact with children is not face-to-face or is only incidental to the Work/ Service (such as serving children the after the principal service).

If a person is in child-related work/services but qualifies for one of the following exemptions, that person will not need a WWCC:

- Servants under the age of 18,
A person's date of birth should be verified from a reliable source of data, such as a birth certificate. A process should be established to alert Safe Parish Representative when the person is approaching their 18th birthday. A WWCC can be obtained once the person reaches 17 years and 9 months.
- Servants in administrative, clerical, maintenance, or ancillary roles if the service does not ordinarily involve contact with children for extended periods (such as a parish secretary or caretaker)
- A visiting speaker or performer for a one-off occasion who will be in the presence of one or more adults.

H. Are WWCC clearances portable?

WWCC clearances are portable within the period that they are valid. Once a person has obtained a clearance, they can quote the WWCC number to other parishes, Councils, or any other services that they were not previously involved.

However, each parish will still need to independently verify the WWCC number before engaging the worker/servant in child-related work.

1.3.2. Coptic Orthodox Diocese of NSW requirements

It is recommended that all Servants are members of a parish for at least 6 months before undertaking a service for children in that parish. This provides time for a person's character and suitability for such a role to be observed.

Service to Children means a role that:

- Involves the supervision of a person engages in service to children within the diocese; or
- Involves an overnight or provision of personal care to children such as camps, toileting or washing; or
- Involves service that has direct or regular contact with children; or
- Requires the person to hold a WWCC clearance.

1.4. Coptic Orthodox Diocese of NSW training

The Coptic Orthodox Diocese of NSW makes it a requirement that all church Servant (undertaking service to children) complete the appropriate training prior to their appointment. This clause is currently not mandated and is currently in a period of Transition. This clause will be deemed operable, at such time as notified in writing by the Board of Trustees and/or the Safe Parishes Working Group.

Chapter Two

MINISTRY WITH CHILDREN AND YOUTH

2.1. General principles

Children have rights

Children have the right to be safe and well looked after when they are in our care. They have the right to be protected, listened to and their needs addressed in all church activities, whether mixed age or child specific.

Leaders are responsible

All those exercising a Service involving children in the church have responsibility for the safety and welfare of the children in their care.

Abuse is power misused

Leaders have authority over children because of their positional power and because of their greater age, maturity, physical size, and life experience. Abuse arises from the misuse of authority or power. Any form of abuse is always wrong.

2.2. Child Safe Standards

The Royal Commission into Institutional Responses to Child Sexual Abuse recommended 10 child safe standards based on its findings, extensive research, and consultation about what makes organisations child safe. The NSW Office of the Children's Guardian seeks to support organisations (including religious organisations) to implement these standards.

The standards work together to emphasise the importance of adopting multiple strategies to address child safety and avoiding an over-reliance on any one strategy. By implementing the standards in our church, we can create and maintain a child safe culture. The 10 Child Safe Standards in extract are as follows:

1. Child safety is embedded in organisational governance and culture.
2. Children participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved.
4. Equity is upheld and diverse needs are considered.
5. People working with children are suitable and supported

6. Processes to respond to complaints of child abuse are child focused.
7. Staff are equipped with the knowledge, skills, and awareness to keep children safe through continual education and training.
8. Physical and online environments minimise the opportunity for abuse to occur.
9. Implementation of the Child Safe Standards is continuously reviewed and improved.
10. Policies and procedures document how the organisation makes children safe.

The child safe standards inform our Coptic Orthodox Diocese of NSW policies and practices and provide a framework for ongoing review and improvement. It is recommended that Servants consider how the standards are being implemented specifically in their own parish and how to improve and develop child safe practices and culture.

2.3. Code of Conduct for Children & Youth Services

The Code of Conduct is written to protect both the children in our churches, and Servants from situations where their integrity or actions might be questioned.

A children's or youth Worker/ Servant **must**:

- Never abuse people especially children or youth, nor cultivate relationships in order to initiate or hide abuse.
- Report to the appropriate authorities any behaviour that could be considered abusive. This includes speaking to the Parish Priest about behaviour by another leader.
- Never be alone with a child or young person in their role where other adult leaders are not present, except with the permission of their parent or guardian.
- Never have children or young people to their home or visit children or young people in circumstances where no other adult is present, except with the permission of their parent or guardian.
- Never touch children or youth in a manner which is inappropriate given their age, gender, cultural background, context, or personal circumstances.

- Never physically discipline a child or young person during their ministry.
- Never make alcohol, cigarettes, or illicit drugs available to children or youth.
- Never develop special relationships with children or youth that could be seen as involving favoritism or any form of special treatment.
- Never engage in any contact with children or youth that is secretive (whether physical or through electronic media or in any other way).
- Never use electronic communication with children and young people in a manner inconsistent with the guidelines for appropriate use as set out in this document when communicating with people in their Service.
- Never become romantically involved with any participant in the youth or children's ministry where they are a leader.
- Never take unauthorised photos, movies, or recordings of anyone, especially of a child or young person on church property or at church activities without church authorisation and the consent of the child's parents or guardians.
- Never view, possess, produce, or distribute restricted material containing sexual acts or nudity; and never view, possess, produce, or distribute any form of child pornography or child exploitation material.

Those who seek to abuse children may use group-based activities to gain the trust of a young person. Having gained that trust, they may then engage in one-to-one activities that offer an opportunity for abuse to occur, including sexual abuse.

Sexual abuse of a child often starts with something minor but can then gradually build up to more involved behaviours through a process of grooming. Grooming is often characterised by secrecy.

Those at greatest risk of child abuse in ministry are undoubtedly teenagers. This is because children's services more easily allow for the possibility of one-to-one unsupervised contact. This is why there should always be more than one adult leader present and efforts made to limit the opportunity for any leader to engage in one-to-one activity with a child away from the presence of other adults.

A breach of this Safe Parishes Policy may raise issues concerning a person's fitness to continue as a Servant. Servants are to inform the Parish Priest or the Safe Parish Representative if they observe another Servant acting in a way that may be contrary to this Safe Parishes Blueprint.

2.4. Guidelines for Children and Youth Services

The guidelines that follow cover a wide array of issues for children's and youth Services/activities, such as the supervision of activities and their appropriateness, the physical safety of those involved, the importance of parental consent, transportation, and trips away, forms of communication with children and youth, as well the issue of meeting up with children or youth outside of programmed events. However, there are three golden rules that are relevant to all the guidelines:

Two or More

There should always be two leaders aged 18 years or over present for all children's and youth services/activities/events.

Never Alone

Servants should not be alone or restricted to a confined area with a child or young person during an activity.

Stranger Danger

Servants should be on the alert for people wandering around – a person unknown to the leaders or not part of the children's and youth Work/ Services should not be allowed access to children and youth.

2.4.1. Physical safety of children

One of the ways that we can protect children in our Parishes is to make sure that they are meeting in a physical environment that is appropriate and safe for them.

Consider particularly the suitability of the space, the safety of the space, and the safety measures in place.

Suitability of the space

- Are toilet facilities available?
- Is the space appropriate for activities such as games and craft activities?
- Is the equipment being used suitable and appropriate for the ages of those using it? (This is a particularly pertinent question to ask if there is any climbing equipment)
- Is the floor non-slip and splinter-free?
- Regarding areas used by toddlers and preschoolers: Is the area fenced off or contained in a room?
- Is there a designated area for strollers that is available to be used for that purpose?

Safety of the space

- Is the area to be used a safe distance from roads or traffic?
- Is the area far removed from places where people may engage in unsafe behaviour (such as smoking or drinking alcohol)?
- Is any glass installed at floor level safety glass?
- Are all child-height cupboards fitted with child-proof locks?
- Is the heating safe to use near children (i.e., is the source of heat removed away from small inquisitive fingers)?
- Are all electrical wiring, sockets and appliances regularly maintained and in a safe condition? Are all sockets child-proofed?
- Regarding areas that may be used for games and outside play, has the area been checked for items that may pose a potential hazard and such items safely removed (such as broken glass, or discarded needles)?
- Is all furniture in a safe condition and without risk of toppling onto a child (such as any stacks of chairs being at a low height)?

First aid and safety measures

- Is there a fire extinguisher or fire blanket available on-site?
- Is there a specific person in the church who is responsible for checking the first aid kit regularly and replenishing it? Is there a well-stocked first aid kit at the activity site?
- Is there a specific person on-site who is trained in first aid?
- Are all Workers/Servants aware of the fire safety and evacuation procedures?

2.4.2. Supervision of Activities & Services

An important part of providing a safe environment is making sure there are enough Servants present to adequately supervise the activities taking place.

The degree of supervision required will vary according to the nature and environment of the activity, the age and maturity of the children and the size of the group. In considering the number of workers/servants required, consider:

- the age, number, ability, and gender mix of the children, and
- the venue, time, duration, and nature of the activity.

Please note that a junior leader (under the age of 18) does not count as a leader for the purposes of supervision.

The head leader should clearly distinguish the different levels of responsibility between them and other supervisors and ensure that these differences are understood.

In the case of camps and similar activities, there should be at least one adult present who has first aid training.

2.4.3. Appropriateness of Activities & Services

Workers/Servants should thoughtfully consider:

1. Message children may learn from the way events are organised and conducted.
2. Games or activities that could in any way emphasise gender, physical, intellectual, or ethnic differences should be assessed for their appropriateness.
3. Possibility of children being harmed.
4. activities or games that require children to act alone or in pairs independent of supervision.
5. In entirety the appropriateness of any DVDs, You Tube clips, computer games, graphics, photographs, and lyrics that they intend to show to children, at all times governed by the age of the youngest child present.

Censorship ratings should be kept to G or PG for children up to Year 6, keeping in mind that some G or PG material may still not be appropriate due to the themes it contains. For youth, servants should make sure that any elements containing violence, sexual activity, nudity, drug use, coarse language or questionable lifestyle are appropriate for the intended audience.

Care is to be exercised if a TV show, film, or computer game has been recommended by the Office of Film and Literature Classification as unsuitable for youth of a particular age (eg, PG, M or MA classifications). MA rated material will rarely be suitable, and material rated M may or may not be suitable with parental consent.

2.4.4. Parental consent

Children and youth must not be taken away from church premises without the written consent of a parent or guardian. Parents must be kept informed of the place and timing of the event and where possible provided with contact details for the head ministry leader. If possible, it is recommended to include Servants of both genders.

Parents or guardians should be asked for information about any physical needs (such as allergies), mental health needs (such as depression) or safety needs of the children and youth attending children's and youth activities. (see registration and permission forms in section 2.4.5)

Servants should never administer medications to a child or young person without the written consent of a parent or guardian.

2.4.5. Registration and permission forms

Parents should complete a form in which they give details of:

- names, addresses and phone numbers of child and parents,
- name and phone number of a contact person in an emergency,
- important medical information, e.g., allergies, disabilities, special diets,
- names of people allowed to collect the child (carefully note if there is a non-custodial parent to whom the child should never be handed over),
- permission for Servants to obtain medical treatment in an emergency.

2.4.6. Transportation

It is the responsibility of parents and guardians to arrange transportation to and from Services for their child unless another specific arrangement is in place.

A child should not be driven anywhere by someone other than the parent for the purposes of a church activity without written permission from a parent or guardian.

When making transport arrangements, reasonable steps should be taken to ensure that:

- All drivers or operators are licensed (green Ps or above), responsible, experienced and are not impaired by alcohol or any other mind-altering or addictive substance, and
- All motor vehicles and other forms of transport used are registered, insured, safe and fitted with age-appropriate child restraints or safety devices (e.g., seat belts, life jackets).

Servants should avoid being alone with a child in a motor vehicle or driving a child home unaccompanied, even with parental permission. If such a situation is unavoidable, the leader should inform another leader of the trip and the reason for it.

2.4.7. Trips away

When events involve children sleeping over, ensure that the sleeping accommodation (where possible) is:

- segregated between males and females,
- supervised by more than one person, preferably including a parent or guardian, and ensure (where possible) that those supervising the sleeping accommodation:
 - are of the same gender as the children being supervised, and
 - do not sleep in close personal proximity to a child unless they are a parent or guardian of the child.

Servants should never share accommodation with only one child unless they are a parent or guardian of the child.

Venues should allow for the privacy of all parties to be respected, particularly when changing clothes, washing and toileting. If a leader needs to wash or toilet a child, they should tell another adult what they are doing.

2.4.8. Communication

Guidelines for those serving children (primary school age and below)

- Servants should take care that their communication with children is appropriate and above reproach. Be aware that those who wish to abuse children may use electronic communications to try to cultivate secretive or exclusive relationships.
- Communication via mail, e.g., birthday cards or letters of encouragement, is acceptable when done with parental knowledge. Servants should not contact children by email, social media, video calls, using chatrooms or by any other form of electronic communication. Servants should not call or text a child on the child's mobile phone, without prior consent from a Parent or Guardian.
- All electronic communication must be with the child's parent or guardian unless consent is provided by the Parent or Guardian. On the rare occasions when a Servant/Worker might need to speak to a child on the phone for ministry purposes, the Servant/Worker is to call the child's parent to explain why he or she is calling. Only then, with the parent's permission, should the Servant/Worker speak with the child. The Servant/Worker should be conscious of keeping the conversation with the child short.

Guidelines for those serving youth (high school age)

- Communication via mail, e.g., birthday cards or letters of encouragement, is acceptable when done with parental knowledge. However, for most young people in our society today, electronic communications are a part of daily life and a way of engaging socially. New social media platforms and apps are being developed every day, and no one policy can hope to keep up with the ever-changing landscape.
- Rather than attempting to create a comprehensive policy for use in in Parishes, there are 10 key principles to guide Servants/Workers in their communication with young people.

TOP COMMUNICATION PRINCIPLES

A. ABOVE REPROACH

Communications should always be above reproach, both in terms of the content and the way it is communicated.

Servants/Workers should:

1. Ask themselves if this communication were to be made known to all the church, would they consider it to be appropriate?
2. be sensitive to the impact of the words and images used, to avoid offence or miscommunication.
3. Never use flirtatious, sexually suggestive, explicit, or offensive language or images Servants/Workers ought also to be conscious of how things might look.
4. Be careful that the circumstances of their communication do not suggest that their relationship with a young person is inappropriate by, for example, communicating regularly or late at night. Even if a servant's motives are pure, misunderstandings can arise.

B. IN PERSON IS BEST

Face-to-face interactions are the best way to build relationships with youth.

Servants / Workers should:

1. Not use electronic communications for matters that are pastorally sensitive, emotionally charged or that require a back-and-forth conversation.
2. Always opt to have a conversation in person. If a young person initiates a religious conversation with a servant using electronic communications, the Servants/Workers should ask if they can talk about it with the young person the next time, they see them.

C. BE TRANSPARENT

Be aware that those who wish to abuse young people may try to cultivate secretive or exclusive relationships through electronic communications.

Servants/Workers should:

1. Be transparent in all communications.
2. Aim to keep communications public and brief. Long or intense conversations by electronic means should be avoided. If a young person initiates a conversation like that, Servants/Workers should consider how to redirect it to a more transparent forum or include other people in the conversation.
3. Keep any emails, text messages or conversation threads with youth, in case an accusation is ever made, or a misunderstanding arises.

D. DON'T INITIATE SOCIAL MEDIA FRIENDSHIPS

There is a power imbalance that exists between servants/workers and the youth they are serving. This imbalance might make it difficult for a young person to say 'no' when a leader initiates a friendship on social media by, for example, sending a Facebook friend request or following them on Instagram.

Servants/Workers should:

1. Not initiate and think carefully before accepting a young person initiates a friendship.

E. SAFETY IN NUMBERS

Servants/Workers should wherever possible:

1. Communicate electronically with groups rather than individuals. The best practice when sending emails or text messages is to include multiple children or another servant in the message.
2. Use closed social media groups (for class media chats) and children should be directed to the group rather than to a leader's individual account.

COMMUNICATION PRINCIPLES

F. BUILD UP THE CHURCH

When posting on social media Servants/Workers should:

1. Think carefully about the impact of what is being communicated on the entire church community (including children, youth and the vulnerable).
2. Consider how they can build up the church community, and avoid being divisive, showing favoritism or making others feel excluded or inferior.
3. Remember they are seen as representing the church.

G. RESPECT OTHERS

Servants/Workers should:

1. Be careful to observe confidentiality and privacy in electronic communications, for example, not publishing the names, contact details or other personal information of people online.

H. BE TRUTHFUL

Servants/Workers should:

1. Should never hide their identity or pretend to be someone else. Electronic communications that seek to hide the identity of the sender or represent the sender as someone else should not be used in ministry in any circumstances.

I. KNOW THE DIGITAL TERRAIN

When using social media, Servants/Workers should:

1. Be aware of and comply with the terms of use, age restrictions, privacy options and controls for each site prior to using it in ministry.

J. REPORTING ONLINE ABUSE

Servants/Workers should:

1. Remember laws regarding mandatory reporting of suspected abuse, neglect or exploitation of children and youth apply equally to the digital world.

AND FINALLY, USE COMMON SENSE!

There may be exceptional circumstances that arise from time to time, and common sense might dictate that a leader deviates from their usual practice when it comes to electronic communications. In those situations, servants/workers must be transparent and above reproach and, where possible, should seek advice from their ministry leader.

Recommendations:

Appropriate Contact Protocols for different ages:

Type of contact	Primary school Students	Years 7-9 Students	Years 10-12 Students
Phone calls	Only after speaking to the parent then, if the parent gives permission, with the child and only for ministry purposes.	Preferably to speak with the parent first and ask permission to speak with the young person.	Reasonable phone contact for ministry purposes permissible. Long conversations to be avoided.
Text messages	X	For logistical purposes only	For logistical purposes and encouragement
Email	X	For logistical purposes and encouragement	For logistical purposes and encouragement
Social Media (Facebook, Instagram, etc)	X	Use discretion and keep in mind the 10 key principles above, but in all circumstances only with parent consent	Use discretion and keep in mind the 10 key principles above, but in all circumstances only with parent consent
Video calls	Only with parental permission and in a group setting, not one on one.	Only with parental knowledge and consent and in a group setting not one to one.	Only with parental knowledge and consent and in a group setting not one to one.

2.4.9. Online Environments

Just as we do with physical gatherings, we must ensure that online environments are safe and minimise the opportunity for abuse to occur (Standard 8 of the Child Safe Standards).

Many of the principles that govern how we conduct Work/Services, face to face will apply to the online world as well, however there are some specific things to bear in mind.

1. Maximise Transparency

- Only communicate with children online for the purposes of Pastoral care in a group setting and not one on one.
- Let parents and carers know when and how you will be interacting online with their children and what rules are in place. Get parental permission for primary aged children and ensure parents are fully informed for high school aged children.
- Communicate expectations and rules about online interactions and meetings to the children in the group, including how Servants are to interact with them. Children should be aware that servants should not be contacting them privately or arranging online gatherings other than the advertised usual times.

2. Social Media

- Youth group members, their friends and parents should be directed to the church or youth group's official social media account (not the individual leader's personal account).
- The official account should be administered by two or more Servants, ideally at least one of each gender, to ensure greater transparency in communication and to moderate the content.
- Do not use social media platforms that allow children to delete posts, messages, images, or comments or that allow for anonymity.

3. Video Conferencing

- Video conferencing such as Zoom meetings should be run on church owned accounts (not the individual leader's personal account).
- When meetings are run online through video conferencing platforms the same principles that apply to Services in person will apply online. Two or more servants should always be present during the meeting and where that is not possible the meeting should be recorded.

- As in the face to face gathering children and youth need to be supervised by responsible Servants during online meetings. Disabling private chat functions and ensuring a Servant is regularly checking in on any small group breakout rooms (or the like) will ensure that participants are not able to engage in inappropriate communication or conduct during the gathering.

2.4.10. Photographs and videos

Servants should not take photos of children or youth without parental consent and should only use photos in accordance with the purposes for which that consent was given.

Do not photograph any child or youth who has asked not to be photographed. Photos of children and youth should focus on small groups rather than individuals:

Do not identify in writing the people in the photograph, e.g., tagging on social media.

- All children must be appropriately dressed when photographed (e.g., not in swimsuits or pyjamas).
- Embarrassing or offensive photos or videos must not be either taken or shared.

Parental permission must be sought before posting photographs or videos of children and youth online. Privacy is of utmost importance and care should be taken to protect children and youth from having their personal information being displayed on a social networking site or church website.

Videos should only be used to highlight Sunday School activities.

When videos of services or activities are distributed or streamed on the web or via other broadcast media, signs should be posted that indicate the service is being or will be broadcast.

If you engage a photographer at a church event it should be clearly stated in writing the role and tasks of the photographer and that in undertaking these tasks the photographer assigns the rights of copyright in the photos to the Parish Priest to hold on behalf of the parish. This will prevent the photographs from being used in other publications and contexts without proper consent.

2.4.11. Meeting outside programmed events

Guidelines for ministering to Year 6 and under

- It is not appropriate for Servants to meet up with children socially unless it is in the context of socialising with the child's family or with parental permission.

Guidelines for ministering to Years 7-9

- It is not appropriate for a youth leader to meet socially with youth in Years 7-9 without written or verbal permission from parents and without discussing it with the Head of the Youth Ministry (or ministry supervisor). This type of meeting is best done in groups rather than one- to-one and should be with youth of the same gender.

Guidelines for ministering to Years 10-12

- Servants may choose to meet casually with mixed groups of youth in Years 10-12 or in one- to-one meetings with members of the same gender. Any meetings should be in a public place and parents and the supervisor of the ministry should be aware of this contact outside of programmed events, including the location, duration, and reason for the meeting. If a leader is proposing to do this, they must obtain parental permission and discuss it with the Responsible Parish Priest.

Chapter Three

REPORTING ABUSE

3.1. Reporting Obligations regarding Child Abuse

Since the Royal Commission into Institutional Responses to Child Sexual Abuse the laws in NSW have been strengthened in several ways to ensure that child abuse is reported to the relevant authorities.

It is now a criminal offence for any adult in NSW who “*knows, believes or reasonably ought to know*” that a child has been physically or sexually abused to conceal such abuse by failing to report it to the authorities, subject to certain reasonable excuses (*Crimes Act 1900*).

In addition to the criminal law there are two legislative schemes in NSW that also place obligations upon churches and/or church workers to report suspected child abuse or certain types of alleged conduct to the authorities - the mandatory reporting obligations under *Children and Young Person’s (Care and Protection) Act 1998* and the Reportable Conduct Scheme under the *Children’s Guardian Act 2019*.

These two schemes aim to keep children safe, and we have obligations to both. The Mandatory Reporter scheme has a focus on reporting current concerns for the safety and welfare of children. The Reportable Conduct scheme has a focus on ensuring the suitability of Servants to work with children by addressing any risks that a leader may pose based on *current or past conduct*.

3.1.1. Mandatory Reporting - Children and Young Person’s (Care and Protection) Act 1998

Anyone who suspects, on reasonable grounds, that a child or young person is at risk of significant harm must report it to the relevant authorities.

Any child abuse that a Parsh Priest or Servants/Workers becomes aware of must be reported to the relevant authorities. A person may become aware of abuse because they have observed indicators of abuse, another person has informed them of their concerns for a child or a child has disclosed to them that they are being abused.

In NSW persons in religious ministry or persons providing religion-based activities to children (0-18 yrs) are mandatory reporters, therefore any church worker (whether paid or voluntary) has a legal obligation to report, as soon as practicable, to the Department of Communities

and Justice (DCJ) the name of a child if there are reasonable grounds to suspect the child is at risk of significant harm.

A child or young person is “at risk of significant harm” if current concerns exist for the safety, welfare or well-being of the child or young person because of the presence, to a significant extent, of any one or more of the following circumstances:

1. The child or young person’s basic physical or psychological needs are not being met (neglect) or are at risk of not being met.
2. The parents or other caregivers have not arranged and are unable or unwilling to arrange for the child or young person to receive necessary medical care.
3. In the case of a child or young person who is required to attend school in accordance with the *Education Act 1990*—the parents or other caregivers have not arranged and are unable or unwilling to arrange for the child or young person to receive an education in accordance with that Act.
4. The child or young person has been, or is at risk of being, physically or sexually abused or ill- treated.
5. The child or young person is living in a household where there have been incidents of domestic violence and, consequently, the child or young person is at risk of serious physical or psychological harm, (domestic and family violence).
6. A parent or other caregiver has behaved in such a way towards the child or young person that the child or young person has suffered or is at risk of suffering serious psychological harm, (emotional abuse).
7. The child was the subject of a pre-natal report, and the birth mother of the child did not engage successfully with support services to eliminate, or minimise to the lowest level practical, the risk factors that gave rise to the report.

It is mandatory to make a report if the child is 0 to 15 and at risk of significant harm. It’s not mandatory to make a report if it is an unborn child, or a young person aged 16 to 17.

Mandatory Reporter Guide

This guide can be used when you observe indicators of abuse or receive a disclosure of abuse to determine if a report should be made.

The Department of Communities and Justice (DCJ) has an online tool known as the [Mandatory Reporter Guide](#) (MRG) that anyone can use to help them assess whether a child is suspected to be at Risk of Significant Harm (ROSH) and to make a ROSH report. In any situation where you suspect a child may be at risk of significant harm and a report to DCJ may be required you are encouraged to use the MRG. The MRG leads the user through a series of questions and at the end generates a decision report outlining what to do next and can even assist the person to create an electronic report.

There are also several helpful articles and resources on the [DCJ website](#) that can assist mandatory reporters with topics such as:

- Deciding to make a report and using the MRG.
- Information needed to make a report; and
- Informing the family of a report.

3.1.2. Reportable Conduct- Children’s Guardian Act 2019

The Reportable Conduct Scheme requires religious bodies to report to the NSW Office of the Children’s Guardian (OCG):

- Certain criminal convictions; or
- Allegations of certain types of conduct concerning a person who holds or is required to hold, a Working with Children Check clearance for the purpose of engagement with the religious body. This means any Servants who are engaged in service to children.

Time limits for reporting

Notice of an allegation must be reported to the NSW OCG by the “Head” of within 7 days of it becoming known and an investigation report (or interim report, if the investigation is not complete) must be lodged with the NSW OCG after a further 30 calendar days.

Conduct that is Reportable

A “**reportable conviction**” is a criminal conviction or a finding of guilt from a court (even if it does not lead to conviction) of an offence involving reportable conduct.

According to section 20 of the Children’s Guardian Act 2019, “reportable conduct” means the following conduct, whether a criminal proceeding in relation to the conduct has been commenced or concluded:

1. A sexual offence committed against or within the presence of a child;
2. Sexual misconduct towards or in the presence of a child;
3. Ill-treatment of a child;
4. Neglect of a child;
5. An assault against a child;
6. An offence under section 43B or 316A of the Crimes Act 1900 (Note: these sections refer to the criminal offences concerning failing to report abuse referenced above); or
7. Behaviour that causes significant emotional or psychological harm to a child.

Conduct that occurred outside the church context.

The “Head” must report allegations of reportable conduct and convictions even if the conduct or conviction is not connected to the activities of the church or the exercise of the person’s role in the organisation. However, the person must be a current church servant/worker to trigger the reporting obligation. Further definitions and explanations of what constitutes reportable conduct can be found in the *Children’s Guardian Act 2019*.

Obligations under the Reportable Conduct Scheme

The Act imposes a legal obligation upon the “Head” to report relevant allegations and convictions to the NSW OCG within the stipulated time limits. Employees (including volunteers) of the religious body also have a corresponding obligation to report their knowledge of any relevant allegations and convictions to the BOT.

The Act defines “Head” as being the chief executive officer or principal officer, however described. In our context this is the **Bishop unless the Pope delegates his authority to Papal Legit**. While the identity of the head is important for determining who has reporting obligations under the Act, in practice all reportable allegations and convictions are investigated and dealt with by the Clerical Council.

If you become aware of an allegation of conduct or a conviction that you think might be reportable you should report this to your Parish Priest, and then together contact the Clerical Council immediately for further advice and so that the matter can be dealt with as soon as possible.

3.2. Handling Disclosures of Child Abuse

If a child discloses abuse to someone, that person should:

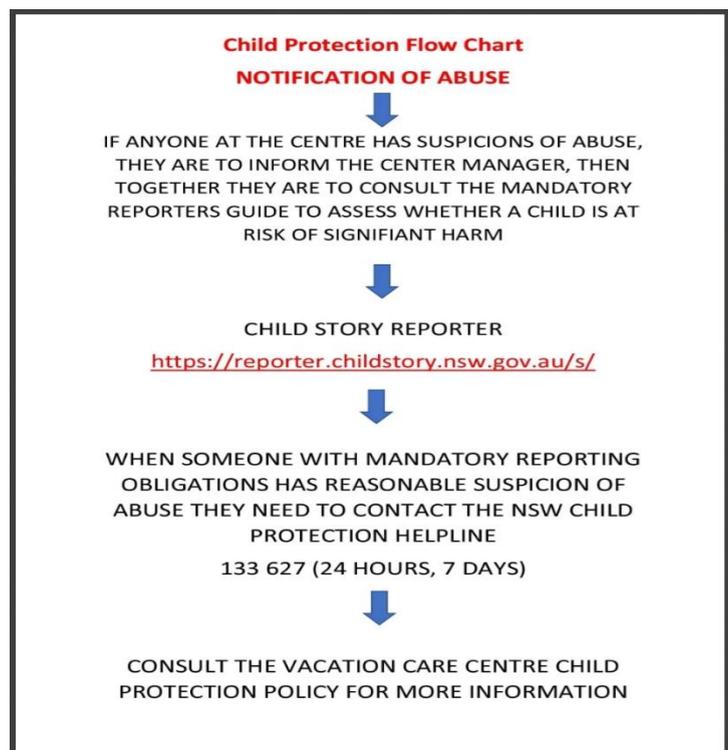
- listen to their story,
- comfort the child if they're distressed,
- let the child know that they're glad they told them, and it was the right thing to do,
- let the child know they're going to get help on what to do next and will get back to them.

Bear in mind that what may seem incredible could be true. Offenders may be cunning, secret, and not immediately or obviously identifiable.

As soon as possible after the disclosure, the person to whom the disclosure was made must:

- Follow the **Child Protection Flowchart** which can be located below at point a.
- Write down the details of what was said, and
- Report the information to the appropriate authorities.

A. Child Protection Flowchart



B. WRITE DOWN the details of what was said including details such as:

- Who made the disclosure.
- Date, time, and place of the disclosure.
- What the child said and any grounds for forming the belief that the abuse has occurred.
- What was said by the person to whom the disclosure was made.

The person to whom the disclosure was made should keep to the facts and not express their opinion. This document must be signed, dated, and kept in a secure place, as it could be subpoenaed in court proceedings.

Confidentiality

Any suspicion, knowledge or disclosure of abuse must be treated with confidentiality. Apart from reporting it to the relevant authorities, the information must not be shared with anyone. However, it is appropriate and advisable to share the disclosure with your Parish Priest (unless of course the allegations are made about the Responsible Parish Priest).

C. REPORT the information to the appropriate authorities.

REPORTING SUSPECTED CHILD ABUSE AND DISCLOSURES

Issue or concern	Report to:
General Suspicions	Responsible Parish Priest
Child or young person currently at risk of significant harm including where they are showing suicidal or self-harming behaviours.	DCJ - Child Protection Helpline 132 111 If possible, discuss with your Responsible Parish Priest or Safe Church Representative* first and use the Mandatory Reporter Guide. Police Contact the police first if the situation requires emergency assistance. Clerical Council

Knowledge of relevant criminal offences or allegations of reportable conduct	Police Clerical Council
Child abuse by a church servant*	Responsible Parish Priest Abuse Report line (1800 774 945) Police

Contact the **Clerical Council** if you are unsure of what to do in any circumstance or if you are concerned that making a report would put a person’s safety in jeopardy or where an allegation is regarding the Responsible Parish Priest.

Do not report to the Responsible Parish Priest if the allegation is regarding the **Responsible Parish Priest*

The person to whom a disclosure is made should not undertake an investigation and should not disclose the allegations to the alleged offender at this initial stage.

3.3. Reporting adult abuse and sexual misconduct

Anyone who suspects that a church worker/servant is engaging in sexual misconduct, abusive behaviour towards another adult or conduct that constitutes a serious breach of Faithfulness in Service should report it to the appropriate authorities. Similarly, any criminal conduct or threat of harm should be reported.

Confidentiality

Any suspicion, knowledge or disclosure of abuse must be treated with the utmost confidentiality. Apart from reporting it to the relevant authorities, the information must not ordinarily be shared with anyone else.

Contact the Clerical Council if you are unsure of what to do in any circumstance or if you are concerned that making a report would put a person’s safety in jeopardy or where an allegation is regarding the senior minister. **In an emergency call 000.**

**Do not report to the Responsible Parish Priest if the allegation is regarding the Responsible Parish Priest*

The person to whom a disclosure is made should not undertake an investigation and should not disclose the allegations to the alleged offender at this initial stage.

3.4. After a report is made

Confidentiality

Any suspicion, knowledge or disclosure of abuse must be treated with the utmost confidentiality. Apart from reporting it to the relevant authorities, the information must not ordinarily be shared with anyone else.

Investigations by the relevant authority

The church or the Responsible Parish Priest responsibility is to report any suspicion, knowledge, or disclosure of abuse to the relevant authority. It is the responsibility of the relevant authority to carry out any investigation that may be required.

In some cases, a report will lead to an investigation by the Police or the Department of Communities and Justice or the Clerical Council and the matter will be taken out of the hands of the parish. In other cases, there may be no action taken by the relevant authority (for example, because the complainant does not want to go through a criminal trial) and the parish will need to determine its response to the matter.

In both cases, the Clerical Council should always be consulted on how to proceed. For example, to consider if to disclose the allegation/report to the alleged offender.

Pastoral care

A victim of abuse may require immediate specialist counselling or other support. When a report is made to the Clerical Council, it can provide advice on care for victims and their families. Victims often need ongoing contact and support, and the Responsible Parish Priest should ensure that an appropriate person is appointed to follow up with them. Other members of the parish may also need specialist support.

If a Servant informs the Parish Priest that a child has disclosed abuse to them, the Responsible Parish Priest should make sure that the above steps are taken with respect to the handling of the disclosure and reporting the abuse. He should also ensure that the leader is appropriately cared for and supported. The Servant may need to debrief about how the experience has affected them.

Chapter Four

GUIDELINES FOR PARISHES REGARDING PERSONS OF CONCERN

The Coptic Orthodox Diocese of NSW is committed to actively ensuring that every person attending the church is safe. As far as possible, all people should be welcome to be a part of the church, including any referred to as **Persons of concern (POC)**. A POC is a person who has been convicted, accused, is reasonably suspected of child abuse or sexual abuse of an adult or some other violent or concerning conduct (including grooming).

4.1 Persons of Concern

When considering how to balance these concerns, a parish or church entity must have the protection of children and other vulnerable persons from abuse as its priority. The POC also needs protection from false allegations and from the opportunity to commit offences. The competing issues that this policy seeks to address can be summarised under the following headings:

- **Reconciliation**

The church should be a community of grace and forgiveness and our usual approach is not to exclude but to welcome. We should acknowledge that reconciliation with God is possible for those who have committed past offences and who are repentant and consider how they might be able to participate in the life of the church.

- **Protection**

A more significant concern however is to ensure that the church community protects the vulnerable. This policy seeks to ensure that the POC's attendance does not compromise the safety of people in the parish or lead to an increased risk of people being abused.

- **Responsibility**

It is not only the church that must take responsibility to provide proper safeguards but also the POC themselves. The POC must take responsibility for their past actions and recognise and take responsibility for the consequences. Even though there may be reconciliation and forgiveness with God for past sin, where that sin was of a serious sexual nature it will have ongoing consequences.

When a POC participates in the life of the parish, the balancing of these competing concerns raises complex issues which may not be appreciated by the POC, or the Parish. It is essential that the Coptic Orthodox Diocese of NSW, through the Clerical Council and Responsible Parish

priest is involved in decisions regarding the participation of a POC in the life of the parish. This will help ensure that people in the parish are protected from the risk of harm.

A POC may take some time to fully realise the implications of their actions or even to realise that their actions or history means that they are a POC. This can be the case particularly when the conduct occurred many years ago, and possibly during a time when child protection practices in the church and in the community were in their infancy. If hasty assurance of restoration or reconciliation is offered before the POC has come to fully understand the implications of their past conduct and take responsibility for it, there is the risk that proper boundaries will not be set around the POC.

When proper boundaries are not set it can leave the POC without accountability or protection from himself or herself. The consequences of an offence, (no matter how long ago it occurred) and the potential for ongoing risk and future offence must be borne in mind together with the need to give an all-encompassing protection to church members.

Given the priority of the protection of children and other vulnerable persons, it is a necessary safeguard to impose restrictions on a person accused or suspected of child abuse or sexual offences, despite the presumption of innocence at criminal law. If a level of certainty emerges that any accusation is false, vexatious, or misconceived, the restrictions may be lifted, depending on the seriousness of the allegations and the advice of the Clerical Council. The NSW Office of the Children's Guardian, through the Working with Children Check (WWCC), will also give guidance and direction on the suitability of a person to work with children if it has the relevant information concerning the allegations or criminal charges.

A person who has been convicted of a child abuse offence or a sexual offence (and indeed any Child Protection (Working with Children) Act 2012 Schedule 2 offence), will automatically be barred from obtaining a WWCC clearance. Those who are unable to obtain a WWCC clearance are prevented by law from being in any child-related position. However, these people may still be members of a congregation. Processes must be put in place to ensure that children and vulnerable people are protected. These people must have clear boundaries as to where they can go and what they can do in the church context, and they must be supervised and held accountable.

Similarly, persons accused or suspected of child abuse, even if not convicted, need clear boundaries as to where they can go and what they can do in the church context. They too must be supervised and held accountable.

4.2 Seven-step process for developing a Safety Plan

This seven-step process must be undertaken in consultation with the Director of Professional Standards, especially when it comes to steps 3, 4 and 5.

STEP 1: IDENTIFY POCs - Identifying persons who are potentially a risk.

The first step is to identify any person/s who may pose a risk to the safety of children and vulnerable persons in the parish or ministry context. The Clerical Council should be contacted and consulted at the initial stages of identifying a POC so that advice, assistance, and oversight can be provided throughout the process.

A Person of Concern includes:

- A person who has pleaded guilty to, has been convicted of, or has admitted to having committed, a sexual criminal offence; or
- A person who is currently charged with a sexual criminal offence; or
- A person who has been disciplined or had other action taken against them under a disciplinary or professional standards process of the church because of sexual misconduct, or who has been refused ordination, employment, or appointment in the church because of an adverse risk assessment arising from sexual misconduct; or
- A person against whom allegations of sexual misconduct are currently being dealt with under a disciplinary or professional standards process of the church; or
- A person who, because of sexual misconduct, has received an adverse risk assessment from a professional with appropriate qualifications and experience in accordance with the requirements of the Clerical Council or another church or a statutory authority; or
- A person who has received or is receiving treatment for disordered sexual behaviour.

The sources of information that may identify someone as a POC can be:

- the person themselves,
- friends or relatives of the person,
- a victim or a person who makes an allegation,
- friends or relatives of a victim or person who makes an allegation,
- public sources such as newspapers, other media, or court reports,
- Police, Parole Boards, Department of Communities and Justice or Department of Corrective Services,
- private information from third parties,
- records kept by the Professional Standards Unit,
- previous parishes or “employers” of the offender or suspect,
- predecessor senior ministers or other members of church staff.

All sources of information regarding a possible POC need to be carefully checked and considered. No action should be based simply on rumour or innuendo. Inevitably, checking will require communication with the POC at some point in time.

The Clerical Council should have a database which contains information on POCs. Upon enquiry being made by a parish and subject to the appropriate exercise of confidentiality and transparency, this information can be given to the parish. The POC will be informed that this information has been provided.

STEP 2: BE PROACTIVE - Act where a possible POC has been identified.

The responsibility for keeping children and vulnerable people safe in the Coptic Orthodox Diocese of NSW is shared by various individuals, office holders and organisations, each with their own role or part to play in the process. It is important that appropriate communication can occur to ensure Coptic Orthodox Diocese of NSW complies. Communication and cooperation need to occur between the Responsible Parish Priest, the Clerical Council, and Bishop (or Papal Legit as appropriate).

In the parish the Responsible Parish Priest has the power to appoint and remove all Servants and officeholders in the congregation.

The Parish Priest and Servants need to be familiar with this chapter of the Blueprint Document so that they can be alert to any possible POCs and know how to manage such persons appropriately.

For its part, the Clerical Council will endeavour to ensure that information about a known POC is communicated to the relevant Responsible Parish Priest. The Safe Parishes Working Group is another resource to advise and support the Responsible Parish Priest and Parish Council in the discharge of their responsibilities. If a potential POC has been identified in a parish the next step is to notify and communicate with the Clerical Council so that a proper assessment of the POC can occur. In turn if the Clerical Council or the Bishop have information about a POC they will be proactive in communicating with the parish if it becomes clear that such a person is attending a local church or has relocated to a new parish or region.

The senior minister is responsible at the parish level, in consultation with the wardens and the parish council, for ensuring that POCs are supervised and held accountable. He and his delegates must keep their eyes and ears open for any POCs. They must take responsibility for ensuring that enquiries are made of the PSU and other sources if they have a concern.

STEP 3: ASSESS RISK - The unacceptable risk test.

No-one should be permitted to work with children or vulnerable people if there is an unacceptable risk that abuse may occur.

As noted above, those convicted of sex offences against children are prohibited by law from working with children. In addition to the legal requirements under the Working with Children legislation there are also criminal law considerations to be mindful of. In 2018 the NSW Government made changes to the *Crimes Act 1900* designed to strengthen child sexual abuse laws, which included the addition of a new offence (s 43B of the Act) for a “failure to reduce or remove the risk of a child becoming a victim of child abuse”. It is now an offence for a position holder, who works for an organisation that engages child related workers, to fail to reduce or remove the risk of child abuse occurring by failing to remove someone who poses a risk to children from a position within that organisation.

Although it is not possible to provide an exhaustive list of situations which may constitute an offence under s 43B one obvious example could include a situation where a church has identified a POC and yet fails to take steps to properly manage the involvement of such person in the parish to ensure the safety of children. It is crucial therefore that a proper risk assessment is undertaken at an early stage and appropriate steps are taken to protect all involved.

In cases where there is no criminal conviction there will ordinarily be an unacceptable risk in circumstances where, in relation to child sexual abuse or criminal sexual misconduct, there is a criminal charge which has yet to be dealt with, an accusation, allegation or complaint currently under consideration or an admission by the person concerned.

The situation is more complex when there have merely been allegations in the past which have not been the subject of findings or a determination, including situations where charges have been dropped or a person acquitted.

Allegations of physical or emotional abuse of children or vulnerable people in the past also need to be evaluated with awareness of the context. The assessment of risk in such a case will depend upon the source of the allegation, an evaluation of its seriousness, the level of investigation of the allegation and what the outcomes were. Where there has been more than one unrelated complaint, there is reason for extra caution.

A risk assessment may take into consideration several factors:

- Whether there has been an allegation of abuse, or any other allegations or concerns about the person's conduct in relation to children or vulnerable people.
- Nature and frequency of the event or events from which the concerns initially arose.
- Type of contact that the POC has with children or vulnerable people.
- Nature of supervision available.
- Circumstances in which an Apprehended Violence Order might have been taken out and requirements and conditions laid down in bail or parole orders.
- Presence of victims in the congregation or parish and the effect that the presence of the POC may have on those victims including the possibility that the POC needs to be asked to attend a different parish or congregation.
- Level of understanding and willingness of the POC to cooperate regarding the requirement for the church to protect children and other vulnerable people, and
- Any additional information which may be relevant in assessing risk.

The process of risk assessment should always be done in consultation with a qualified forensic psychologist.

A person who has either admitted to, or been found to have perpetrated, sexual, or other abuse and who is repentant for what they have done in the past will understand the need for child protection or other safety measures. Caution is required where a person claims to be repentant yet fails to acknowledge the need for such requirements.

STEP 4: SET BOUNDARIES

If a POC has been identified and assessed by a forensic psychologist and found to pose a risk the next step is to set appropriate boundaries to ensure that children and vulnerable people are safe, and the risk of harm is minimised. Again, this step in the process must be conducted in consultation with the Clerical Council.

A common characteristic of POCs is their failure to understand why their movements or activities in a church context should in any way be constrained. They will often minimise their past and tend to be overly optimistic about their future. Sometimes they will excuse the past behaviour as a youthful indiscretion or as arising from circumstances that are no longer present in their lives. A POC may refer to their “blameless” track record since the earlier conduct insisting that to impose boundaries or restrictions on their involvement in the life of the church is unforgiving and lacking in grace.

Whatever the situation it is important to work with them pastorally to encourage them to take responsibility for the consequences of their past conduct and to see the mutual benefit in keeping them away from contact or potential contact with children or vulnerable people. Benefits include that children and vulnerable people will be safe, parents and the congregation will have confidence that children are protected and the POC will be protected from any opportunity to offend and the possibility of false allegations.

Sometimes a person will require the assistance of a trained psychologist or other professional to help them to come to a proper understanding of the implications of their past conduct. In such circumstances the POC may need to take time out from attending church altogether while they work through the issues.

Setting appropriate boundaries

The setting of boundaries for the POC should include a clear written statement of:

- which services and activities he or she may and may not attend (in extreme cases of high risk, consideration should be given to complete exclusion from parish activities altogether),
- the buildings and rooms into which the POC may go,
- the times the POC can be on church premises,
- who the POC may associate with at church, and
- the supervision and accountability which has been put in place.

If a POC represents an unacceptable risk to the safety of children or vulnerable people, he or she must not be involved in any positions of Servantship or authority. He or she must not participate in any “up-front” activity including, but not limited to, greeting visitors at the door, taking up the collection, reading lessons, leading a bible study or other small group or leading prayers. To allow such activity can suggest apparent endorsement of the POC by the parish and creates a risk to children or other vulnerable people.

Once appropriate boundaries have been determined they are written into the Safety Plan.

The Safety Plan should also include:

- acknowledgement of past conduct or allegations and consequent risk,
- acknowledgement of the need for others to be informed of the risk, such as key.

Servants, if necessary

- undertaking to participate in treatment,
- definition of boundaries,
- undertaking to abide by boundaries,
- nomination of mentor/s
- statement (if relevant) as to the relationship between this Safety Plan and any supervision by the Probation and Parole Service,
- agreement to meet regularly with mentors,
- acknowledgment of consequences of failure to comply i.e., exclusion,
- undertaking to notify of attendance at or move to another parish,
- permission from the POC for information to be passed on to the Clerical Council and to another parish in the case of transfer, and

- willingness to participate in reasonable restorative justice processes or counselling which may aid the healing of victims.

When preparing the Safety Plan, it is important to note that the Safety Plan template available on from the Clerical Council or Responsible Parish Priest is not a “one size fits all” document. It is not intended to be printed out and the blanks filled in nor should a POC ever be presented with a blank copy of the template and asked to insert their information.

Rather, the Responsible Parish Priest in consultation with the Clerical Council needs to work on a draft of the document that reflects the individual circumstances of both the POC and the Parish prior to it being given to the POC. After this a process of dialogue with the POC can commence. It is not up to the POC to determine the contents of the document, and the paramount consideration must always be the safety of children and vulnerable people. The process will involve careful consideration of appropriate conditions and boundaries based on all the relevant information.

In cases where the POC refuses to co-operate and sign a Safety Plan, consideration should be given to whether it is appropriate for the POC to continue in the parish at all.

STEP 5: SUPERVISE/MENTOR

Once appropriate boundaries have been established and agreed to, the POC must be regularly monitored and supervised. The parish will need to appoint mentors and/or form a Parish Accountability Group to assist with this process.

There should preferably be at least two people who undertake the task of being mentors. Whilst the senior minister can undertake the task, it is preferable to have other people involved with the senior minister acting as their supervisor.

Mentors need to:

- be recognised as appropriately gifted, experienced, and respected congregation or parish Servants,
- understand the nature of offenders,
- understand the nature of the conduct for which the safety plan is required,
- understand the demanding and sometimes onerous nature of the task,
- be prepared and available to meet with the POC at least fortnightly,
- attend church services and activities at the same time as the person,
- be of an appropriate gender in relation to the POC, and
- report regularly to the Parish Priest on the progress of the POC.

It is important for each Parish to assess in consultation with the Clerical Council whether they have the necessary personnel to provide adequate and appropriate accountability and support structures for any POC wishing to attend the church before entering a Safety Plan. If the parish cannot realistically commit to long term supervision and support of the POC it may be that such a person will need to worship elsewhere.

If the human resources are available to properly support and supervise the POC the Safety Plan will need to be signed and dated by the POC, the Parish Priest and the Clerical Council. A copy of the Safety Plan must be provided to the PSU as soon as possible for inclusion on the register of Safety Plans.

After the Safety Plan has been entered into it will be necessary to inform key Servants of any perceived risk. There should be sufficient information provided so that it is clear what potential risks are involved. This should be carried out sensitively.

Expressions such as “X is considered to pose a potential risk to children” or “X has agreed to associate only with adults” are preferable to “X is a pedophile”.

Parish Priests and other senior Servants should be aware of the conditions and boundaries that have been set. There should be a system in place to ensure that the POC is monitored (i.e., there is always line of sight supervision) during church services and church activities.

STEP 6: REVIEW of supervision and support

The senior minister must ensure that at least every three months he meets with the POC the mentors and the key leaders to ensure that the boundaries are being adhered to and the POC is coping and continuing in treatment, if required, as well as to get feedback as to any change in the level of risk.

Any re-offending by the POC or failure to comply with the Safety Plan requires immediate action. Steps need to be taken to eliminate the risk posed by the POC, and depending on the circumstances, this may involve exclusion from the Parish and notification to the appropriate authorities (e.g., Police, Department of Communities and Justice and the Clerical Council). If the level of risk changes there needs to be careful re-evaluation, re-negotiation, and variation of the boundaries and this may require a new Safety Plan to be entered in to.

All Safety Plans are reviewed every 12 months by the Responsible Parish Priest in consultation with their treatment provider, and the Clerical Council will send a reminder to the Parish to ensure the review is conducted.

STEP 7: BE RESPONSIBLE - Inter-parish, diocesan, and inter-agency co-operation.

Senior ministers must be committed to ensuring that they inform the PSU of all situations where a POC is a risk. They also need to pass full details of the risk on to any other parish or congregation to which the POC transfers. Further, they are required to pass on to the PSU information about any transfers or departures.

Ongoing communication with the Clerical Council needs to occur throughout the process and after boundaries have been set. If the POC leaves the parish this must be communicated to the Clerical Council and the Regional Bishop. If information is known about the POC's whereabouts or any new church, they may be attending the Clerical Council must be informed.

Likewise, the Clerical Council will communicate with any new parish priest appointed to a parish and inform them of any POCs at that parish.

The police (and only the police) have the capacity to apply to the Local Court for orders prohibiting certain offenders who pose a risk to the lives or sexual safety of children from engaging in specified conduct (*Child Protection (Offenders Prohibition Orders) Act 2004*).

This process should be considered where arrangements as set out above do not work. The Court must be satisfied that there is reasonable cause to believe, having regard to the persons nature and pattern, that the person poses a risk to the lives or sexual safety of one or more children, and that the making of the order will reduce that risk. Consideration must be made for the person against whom the orders are proposed to be made.

Chapter Five

KEY DOCUMENTS
AND CONTACT
DETAILS

5.1. Key documents

Safe Parishes documents

Additional useful resources and information are currently in the process of being created. The Coptic Orthodox Diocese of NSW will formally announce its launch in due course.

5.2. Contact details

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Feedback

The Coptic Orthodox Church Diocese of Sydney and affiliated regions (**Coptic Orthodox Diocese of NSW**) commits itself to ensuring the safety, nurturing, and spiritual growth of all its members including the Young and Vulnerable. This is what, was commanded of us and called by God to do.

The Congregation and its members who work with children and young people play an important role, not only in the support, care and spiritual nourishment of its congregation and broader Australian Community but in proactively creating a safe and respectful environment.

In addition to our religious conviction and obligations, the **Coptic Orthodox Diocese of NSW** is committed to responding to the Royal Commission into Institutional Responses to Child Sexual Abuse, by operationalising and complying with the Commonwealth Child Safe Framework. The Child Safety Policies and Compliance measures are also articulated in the *National Framework for Protecting Australia's Children*.

Our aim is to support parishes and church workers to provide care and protection for everyone by building a culture of safe ministry. Any feedback to help us review and improve is welcome.

You can submit your feedback by emailing safeparish@coptic.org

Document Version Control

Version	Date	Author	Description of Changes	Approved By	Date
1.0	19.10.2023	Very Rev. Fr Gabriel Yassa*	<p>Policy created to govern a culture of Safe Services across all levels of leadership and the church, through greater awareness, transparency, and accountability.</p> <p>(* in consultation with the Safe Parishes Working Group)</p>	Diocesan Board of Trustees	21.10.2023



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& AFFILIATED REGIONS