

Reporting Safety Concerns Procedure



Purpose

The purpose of this procedure is to assist Devonport Church of Christ in meeting its obligations for reporting behaviours of concern against vulnerable people by ensuring an appropriate incident response is followed. It outlines responsibilities, principles, and processes to follow.

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

This process should be followed by all Devonport Church of Christ leaders responsible for ministries or programs involving vulnerable people, with support from a Safe Ministry Contact Person, when they suspect, on reasonable grounds, or receive a report or concern relating to, the abuse or neglect of a vulnerable person within Devonport Church of Christ programs.

Principles

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

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

At each point in the process, those responding to concerns will need to:

1. Agree on a reasonable course of action based on the information at hand and apply the principles on a case-by-case basis,
2. Ensure the incident and outcomes are thoroughly documented and saved as a record of their decisions and any actions they have determined to take which includes clearly outlining roles and responsibilities and follow-up.

A summary of incidents and responses should be regularly reviewed by the Council of Church Leaders (Board members) to implement risk management strategies which focus on preventing, identifying, and mitigating risks to children and vulnerable people.

Process

Step 1 — Record details of the concern

The Safety Concerns of Vulnerable People Reporting Procedure should be initiated when a Devonport Church of Christ Safe Ministry Contact Person, staff member, ministry leader or volunteer receives a concern or a report of an incident.

Refer to the following Appendix for a list of significant elements to include when recording an incident/concern.

Appendix A Recording a concern

Step 2 - Work through the steps related to the type of concern

Share the Incident/Concern details with a Safe Ministry Contact Person, then (together) work through each type of concern, only skipping if mutually agree it can be skipped.

If the type of concern is applicable, record the next steps that need to be taken, and take those steps. The Safe Ministry Contact will now coordinate the process.

Appendix B Concern about a child or vulnerable person

Appendix C Concerns about a leader

Appendix D Concern about a participant

Appendix E Concern about a program

Appendix F Concern about an incident outside the organisation

Step 3 — Record a summary and review regularly

After the concern has been appropriately managed and responded to, ensure the summary details are discussed at the next Council of Church Members meeting, and that any ongoing actions or commitments are properly in progress.

Contact Information

Contact information for key internal and external organisations can be found at the end of this document.

Appendix A — Recording a concern

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

Some significant elements to record include:

- 1. Name of person receiving concern**
- 2. Date concern received**
- 3. Name of person who raised the incident/concern**
- 4. Initial details**

Record as many details as you can remember. If possible, ask the reporter to email their concern.

- 5. Further details**

Get as much information as possible from the person raising the concern, if appropriate in the circumstances (however, if the person reporting is the alleged victim, it might be important to seek external advice before asking further questions).

Questions may include:

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

When receiving a report:

- Use active listening, be calm, supportive and reassuring with any potential victim or witness. Concentrate on making the person providing information feel that they are doing the right thing and that you are there to help them.
- Explain what you will do with the information.
- Explain that you are required to act on the information provided.

When receiving a report, do not:

- Make promises to any person, except to say that the matter will be taken seriously.
- Investigate the matter yourself.
- Disclose the information to people other than those you are required to tell.
- Approach the suspect about the incident, challenge the suspect or share information about the incident with the suspect.
- Make judgements about the validity, credibility or veracity of the information.

Appendix B — Concern about a child or vulnerable person

This step should only be used when there is a concern about a (named/identifiable) child or vulnerable person

The Safe Ministry Contact Person is responsible for following these steps and contacting agencies.

Procedure

- Once a report is received that someone has a concern about a child or vulnerable person (or someone expresses concern about themselves. Determine which agency to report this to. *Note as the church is considered to be a mandatory reporter these reports need to be made either immediately or within 3 days to the relevant agencies.*
- Call the Police on 000 if the matter is urgent.
- Make a mandatory official report to one of the following agencies:
 - the Strong Families, Safe Kids Advice and Referral Line
 - the Office of the Independent Regulator
 - the Elder Abuse Hotline
 - the National Disability Abuse and Neglect Hotline

For further information on the Strong Families, Safe Kids Advice and Referral Line, the Office of the Independent Regulator and contact details for these organisations please refer to the following page.

Ensure written notes are taken so an accurate report can be made.

- Contact the Police to inquire if a police report is required.
- Notify the Senior Minister.
- Contact Devonport Church of Christ insurance provider.
- Contact any pastoral care persons to provide support to the child and carers.
- The agency that is contacted will advise the next steps and what the Church needs to do if anything.
- Due to the confidential nature of this situation the following, steps may or may not be appropriate:
 - Full notes regarding the reporting of and action taken in relation to the concern raised is to be given to the Church Administrator for appropriate record keeping.
 - Consider what communication regarding this matter is appropriate.

To determine whether to call the Strong Families Safe Kids Advice and Referral Line or the Office of the Independent Regulator, please read the below information.

Strong Families Safe Kids Advice and Referral Line

(<https://strongfamiliesafekids.tas.gov.au/>)

It is the first point of contact for community members with concerns for the safety and wellbeing of a child or young person in Tasmania. It is a service that focuses on providing earlier intervention to identify the needs of the child and their family and support them to access the help they require.

The ARL is the contact point for all mandatory reporters, concerned relatives, friends or neighbours. Parents and children can also call to ask for help for themselves.

Office of the Independent Regulator Tasmania

The Reportable Conduct Scheme (the Scheme) requires leaders of specific organisations (including churches) to:

- notify the Independent Regulator upon becoming aware of conduct related to child abuse involving an adult worker (this is called reportable conduct), and
- conduct investigations (they may engage an investigator).

The definition of worker under the Child and Youth Safe Organisations Act 2023 (as above) includes paid workers, volunteers and contractors.

The Reportable Conduct Scheme is about ensuring reportable conduct is investigated properly in a child-centred way. This is done through oversight by the Independent Regulator, who must receive:

- Within 3 business days: Leaders must report reportable conduct to the Independent Regulator in writing and provide basic details such as the worker's name. As soon as possible, leaders must start an investigation.
- Within 30 days: Leaders must provide an update including information about the allegation or conviction, whether any actions have been taken (for example, placing a limit on a worker's contact with children) and any written submissions.
- At the end of the investigation: Leaders must provide findings of the investigation, reasons for the findings and details of any actions that have been taken as a result.

Reportable Conduct under the Child and Youth Safe Organisations Act 2023 (as above) includes: grooming, physical violence, sexual offences and sexual misconduct, significant emotional or psychological harm, significant neglect or relevant offences that constitute reportable conduct.

Reports can be made from the report a concern page <https://www.oir.tas.gov.au/report-a-concern>.

Any suspected reportable conduct must be reported to the Independent Regulator by the leader of the organisation (or their delegate). If the person raising the reportable concern reasonably suspects the conduct to have occurred, this is enough for it to be reported. It is not relevant whether the leader of the organisation also holds that reasonable suspicion. Leaders must also report any reportable conduct concerns about current workers, even if the alleged conduct is historical in nature.

Tasmania's Child and Youth Safe Organisations Framework (the Framework) is a law to keep children safe in organisations. The Framework is established under the Child and Youth Safe Organisations Act (<https://www.legislation.tas.gov.au/view/html/asmade/act-2023-006>)

Contact Information

Please find below a list of contact information for key internal and external organisations:

Safe Ministry Contacts	Email	Phone
Simona Piscioneri	simona@devonportcoc.com.au	03 6424 3441
Matthew Atkins	safeministry@devonportcoc.com.au	03 6424 3441
Key Contacts		
Churches of Christ (Vic/Tas)	safeplaces@churchesofchrist.org.au	03 9488 8800
External Contacts	Website	Phone
Police Emergency		000
Devonport Police Station		03 6478 4011
Office of the Independent Regulator	https://www.oir.tas.gov.au/report-a-concern	1800 754 728
Strong Families Safe Kids Advice and Referral Line	https://strongfamiliesafekids.tas.gov.au/	1800 000 123
Elder Abuse Phonenumber		1800 353 374
National Disability Abuse & Neglect Hotline		1800 880 052

Appendix C — Concerns about a Church Leader

A 'Leader' could be a minister, staff member, Council of Church Leaders (CCL) member, program leader or volunteer within Devonport Church of Christ. If the concern/incident relates to the behaviour of a Leader, then the organisation may bear the responsibility for the leader's actions.

Note:

- If multiple leaders have been implicated in the concern, the Safe Ministry Contact Person should go through this process for each leader individually.
- If a concern is raised about the Senior Minister, the Chairperson of the CCL must be advised immediately. This matter will now be investigated by the Chairperson in liaison with Churches of Christ Vic / Tas.
- If no specific leader can be identified, it may be appropriate to treat the issue as a 'Program Concern' which relates to the general behaviour of leaders within the program

Procedure

1. Notify the Senior Minister

Safe Ministry Contact to advise the Senior Minister and work through this procedure and determine if there are reasonable grounds to suspect a leader has behaved inappropriately. The Senior Minister will advise the CCL when appropriate.

Record any notes or reasons for your determination. It is possible that claims made about leaders could be accurate, but not describe inappropriate behaviour; or the claims could be such that no reasonable person would consider them necessary of further review.

2. Determine if outside agencies should be contacted

Record who will contact which agency and any details or recommendations coming out of that contact. This may be done with or through the person who originally made the report.

3. Determine what steps should be taken to investigate

The appropriate method of investigation will depend on the circumstances and the severity of the suspected behaviour and on the suspected leader's role in the organisation.

- a. If the suspected incident occurred outside the responsibility of the organisation, and in which the suspected leader was not acting (or could not be reasonably thought to be acting) as a representative of the organisation, it may not be appropriate for the organisation to investigate.
- b. If the suspected behaviour is severe misconduct or the position of the leader is at a high level within the organisation, it may be appropriate to arrange an Independent Investigator to investigate the suspected behaviour with a level of transparency and separation from the organisation. The Independent Investigator should provide a report and recommendations to the Council of Church Leaders for their review and action.
- c. Otherwise, it may be appropriate to appoint a person within the organisation to investigate the suspected behaviour.

- d. In some circumstances it may be appropriate to temporarily remove the suspected Leader from various responsibilities during the investigation (see step 4 below).
- e. It may be appropriate to organise pastoral care.

Record what steps should be taken, including who will action those steps and what will be expected as a result.

Record any resulting decisions or recommendations provided by an investigator (if applicable).

4. Determine what action should be taken as a result of the investigation

There may be reasons to consider removing the suspected leader from their duties or responsibilities, and to what extent.

- a. It may be appropriate to remove the leader from all responsibilities if the severity of the suspected behaviour is such that it warrants concerns about the ongoing safety of other persons in the organisation.
- b. It may be appropriate to remove the leader from responsibilities where they would be brought into any or substantial contact with the suspected victim.
- c. It may be appropriate to not remove the leader, but to reduce their responsibilities for a time to ensure they are aware of the appropriate behaviour of a leader in their role.
- d. It may not be necessary to take any actions related to the suspected leader.

5. Recording the decision and communicating the outcome

This may include:

- a. Communicating with the suspected leader
- b. Communicating with the suspected leader's supervisor
- c. Communicating with the Council of Church Leaders and Staff
- d. Communicating with the suspected victim
- e. Communicating with the Leaders team

Full notes regarding the reporting of and action taken in relation to the concern raised are to be given to the Church Administrator for appropriate record keeping.

Appendix D — Concern about a participant

A 'participant' is someone who attends a program or event run by our organisation.

Note:

- Only follow this step if there is a concern raised about the behaviour or conduct of a particular person which occurred in the context of an organisation program. If the concern is regarding someone's behaviour outside the context of an organisational program, refer to Appendix F "Respond to concerns about incidents outside the organisation".
- If multiple participants have been implicated in the concern, the Safe Ministry Contact Person should go through this process for each participant individually.
- If no specific participant can be identified, it may be more appropriate to treat the issue as a 'Program Concern' which relates to the general behaviour of leaders within the program, refer to Appendix E.

Procedure

1. Determine if there are reasonable grounds to suspect a participant has behaved inappropriately

Discuss the matter with the Senior Minister. Record any notes or reasons for your determination. It is possible that claims made about a Participant could be accurate, but not describe inappropriate behaviour; or the claims could be such that no reasonable person would consider them necessary of further review.

2. Determine if outside agencies should be contacted

Record who will contact which agency and any details or recommendations coming out of that contact. This may be done with or through the person who originally made the report.

3. Determine what steps should be taken to investigate

It may be appropriate to investigate the suspicion further. Depending on the nature of the incident or the relationships between the parties, it may be appropriate to appoint an independent investigator.

The Independent Investigator will provide a report and recommendations for review and action.

Otherwise (if appropriate) decide who, within the Church, will investigate and record their report.

4. Determine what action should be taken as a result of the investigation

Depending on the suspected or potential severity of the incident, there may be a range of options to consider taking in response to the concern.

- a. It may be appropriate to appoint someone to speak with the suspected Participant about standards of behaviour expected for organisation Participants.
- b. It may be appropriate to set out some standards of behaviour for this Participant to ensure future behaviours are appropriate.
- c. It may be appropriate to request the participant does not attend various programs for a time, or until various criteria are met.
- d. It may be appropriate to inform the pastoral team, so they can provide appropriate pastoral care.

5. Recording the decision and communicating the outcome

This may include:

- a. Communicating with the participant in question
- b. Communicating with the Ministry Leader
- c. Communicating with the Council of Church Leaders and Staff
- d. Communicating with the suspected victim
- e. Communicating with the team

Full notes regarding the reporting of and action taken in relation to the concern raised are to be given to the Church Administrator for appropriate record keeping.

Appendix E - Concern about a church program

A 'Program' is an event, group, or session which is run or hosted by Devonport Church of Christ. It includes its spaces, environments, and culture. It may also include any online environments used for the Program by Leaders or participants.

If a concern is raised about Leadership in general, or the general behaviour of Participants, it might be suitable to use these following steps to respond.

Procedure

1. Determine if there are reasonable grounds to suspect a Program is unsafe

Discuss the matter with the Senior Minister. Record any notes or reasons for your determination. It's possible that claims made about a Program could be accurate, but not describe inappropriate culture or an unsafe environment; or the concerns could be such that no reasonable person would consider them necessary of further review.

2. Determine what steps should be taken to investigate

Record what steps should be taken, including who will action those steps and what will be expected as a result. Record any resulting decisions or recommendations.

3. Determine what action should be taken as a result of the investigation

Depending on the severity of the concerns about the Program and the result and recommendations of any investigation, there may be a variety of steps to consider taking.

- a. It may be appropriate to gather some or all the Program Leaders to re-establish appropriate culture standards and acceptable behaviours.
- b. It may be appropriate to gather some or all the Program participants to increase awareness of Devonport Church of Christ's policies and expectations of appropriate behaviours.
- c. It may be appropriate to conduct a Program Risk Assessment.
- d. It may be appropriate to recommend updated systems or processes to be used within the Program by the Leaders.

4. Recording the decision and communicating the outcome

This may include:

- a. Communicating with the participant in question
- b. Communicating with the Ministry Leader
- c. Communicating with the Council of Church Leaders and Staff
- d. Communicating with the team

Full notes regarding the reporting of and action taken in relation to the concern raised are to be given to the Church Administrator for appropriate record keeping.

Appendix F Concern about an incident outside the organisation

If the concern relates to an incident which occurred outside the context of a church Program, and the person of concern was not acting as a representative of the church, the concern is most likely outside the direct responsibility of the church.

However, as responsible members of our communities, there may be appropriate steps to take in response to external concerns. Many of these steps should have already been captured in appendix A if the concern was about a child or vulnerable person, by contacting various agencies.

Procedure

1. Determine if there are reasonable grounds to suspect the concern is valid

Record any notes or reasons for your determination. It's possible that concerns raised about an external incident could be such that no reasonable person would consider them necessary of further review.

2. Determine what, if any, steps should be taken about this concern

Depending on the severity of the concern, it may be appropriate to consider one or several of the following:

- a. Contact Crime Stoppers, the Police or other emergency services.
- b. Contact Family and Community Services.
- c. If there is a concern about a person who is in a position of influence in another organisation, it may be appropriate to help the reporter raise their concern through the appropriate channels in that organisation.
- d. It may be appropriate to inform the pastoral team, so they can provide appropriate pastoral care.

3. Recording the decision and communicating the outcome

Discuss with the Senior Minister if this matter needs to be communicated to others.

Full notes regarding the reporting of and action taken in relation to the concern raised are to be given to the Church Administrator for appropriate record keeping.