

Forest Lake Baptist Church

Safe Spaces and Safeguarding Policy (2026)

The Queensland Family and Child Commission (a statutory authority of the Queensland Government) requires all Child Safe Organisations to develop and implement a Child Safety and Wellbeing Policy.

This Safe Spaces and Safeguarding Policy (hereinafter referred to as “the Policy”) is the official Child Safety and Wellbeing Policy of Forest Lake Baptist Church (hereinafter referred to as “the Church”).

The Policy aligns with the requirements of the *Child Safe Organisations Act 2024* and the *Working with Children (Risk Management and Screening) Act 2000*.

This Safe Spaces Safeguarding Policy sets out the Church’s commitment and governance framework for child safety.

Operational detail is contained in the FLBC Safe Spaces Safeguarding Procedures. Supporting tools, templates and ministry-specific guidelines are contained within the Safe Spaces Supporting Documents folder.

Together, these documents form the Church’s Child Safety and Wellbeing Framework.

Additional related policies, procedures and supporting documents are listed below. These documents are referenced throughout this policy and are available within the relevant folders.

FLBC Safe Spaces Safeguarding Policy
FLBC Cultural Safety & Equity Policy
FLBC Safe Spaces Safeguarding Procedures
FLBC Safe Spaces Safeguarding Supporting Documentation

1. Context

Forest Lake Baptist Church believes that **every person is important to God**. This conviction flows from Jesus' command to love God and love others (Mark 12:30–31; John 15:12), and it shapes the way we welcome, value, and protect children and people in vulnerable circumstances (Mark 10:14; Mark 9:37).

Accordingly, the Church is committed to protecting the **rights, safety, wellbeing, and cultural safety of children**, and to promoting safe and supportive environments across all ministries. This Policy is implemented under the oversight of the Church Leadership (Safe Church Coordinator, Safe Children Committee, Church Leadership Team, and Ministry Council) and is reviewed **at least annually** to ensure it remains effective, current, and aligned with legislative and best-practice safeguarding requirements.

The ongoing review and implementation of this Policy is required to ensure:

- a culture of safety is maintained across all ministries of the Church;
- the Church is compliant with legislation relating to identifying, responding to, and reporting harm, and protecting children (and, where relevant, young people and vulnerable adults) participating in church ministries; and
- the Church meets its insurance requirements relating to safeguarding and risk management.

2. Purpose

Underlying this Policy is the acknowledgement that safe spaces begin and end with the knowledge that God's love is for all people. The Church is committed to the Biblical call to care for the vulnerable and acknowledges God's special concern for the poor, the marginalised and the oppressed. There are many biblical references to this call. We reference the following as a specific mandate from God to ensure safety and protection especially for Children in our community.

- “Love the Lord your God with all your heart, soul, mind and strength and love your neighbour as yourself.” (Mark 12:30–31)
- “Learn to do right; seek justice. Defend the oppressed. Take up the cause of the fatherless; plead the case of the widow.” (Isaiah 1:17)
- “Speak up for those who cannot speak for themselves, for the rights of all who are destitute.” (Proverbs 31:8)
- “My command is this: Love each other as I have loved you.” (John 15:12)
- “Let the children come to me, and do not hinder them, for the kingdom of God belongs to such as these.” (Mark 10:14)
- “Whoever welcomes one of these little children in my name welcomes me.” (Mark 9:37)

This policy should be read in conjunction with the Minimum Doctrinal Statement laid down in the *Constitution and By-laws of the Baptist Union of Queensland* and any published doctrinal statement of the Church. Nothing in this policy should be interpreted or construed

so as to conflict or deviate from the doctrines and tenets of faith of the Baptist Church as defined in these Statements.

With this in mind, the Church has adopted this Safe Spaces Safeguarding Policy to:

- provide a safeguarding framework to inform, guide and support the stakeholders who work with and participate in our ministries and activities; and
- fulfil our legal and insurance compliance obligations in relation to:
 - o staff and volunteers engaged in working with Children; and
 - o reporting matters, including child sexual abuse, sexual misconduct and reportable conduct involving a child, to government authorities.

This Safeguarding Policy outlines the Church's commitment to comply with the 10 Child Safe Standards and the Universal Principle of Queensland's *Child Safe Organisations Act 2024*:

- **Standard 1 - Leadership and Culture** – Child safety and wellbeing are embedded in leadership, governance, and culture.
- **Standard 2 - Voice of Children** – Children are informed of their rights, participate in decisions affecting them, and are taken seriously.
- **Standard 3 - Family and Community** – Families and communities are informed and involved in promoting child safety and wellbeing.
- **Standard 4 - Equity and Diversity** – Equity is upheld, and diverse needs are respected in policy and practice.
- **Standard 5 - People** – Those working with Children are suitable and supported to reflect child safety and wellbeing values in practice.
- **Standard 6 - Complaints Management** – Processes to respond to complaints and concerns are child-focused.
- **Standard 7 - Knowledge and Skills** – Staff and volunteers are equipped with the knowledge, skills and awareness to keep Children safe through ongoing education and training.
- **Standard 8 - Physical and Online Environments** – Physical and online environments promote safety and wellbeing and minimise the opportunity for Children to be harmed.
- **Standard 9 - Continuous Improvement** – Implementation of the Child Safe Standards is regularly reviewed and improved.
- **Standard 10 - Policies and Procedures** – Policies and procedures document how the Church is safe for Children.

The **Universal Principle** requires the Church, in implementing and complying with the Child Safe Standards, to endeavour to provide an environment that promotes and upholds the cultural safety of Aboriginal and Torres Strait Islander Children. The Church is committed to creating spaces where all Children including Aboriginal and Torres Strait Islander Children and other Culturally and Linguistically Diverse (CALD) Children feel culturally safe, welcomed, safe, valued, included, and respected.

3. Scope

This Policy applies to:

- **People Covered** – All members of the Church Leadership (including Elders, Ministry Councillors, Safe Spaces Team, Safe Church Coordinator), Pastors, those on a student placement, staff, volunteers, contractors, visitors, parents, carers, and anyone else involved in Church activities;
- **People Protected** – Children; and
- **Settings and Activities** – All locations, programs and activities associated with Church sites, offsite events and excursions, online platforms, outreach ministries, and any partnerships involving children.

4. Church's Commitment

Forest Lake Baptist Church believes it is important to respect and treat everyone as unique individuals created by God, and to give special attention to the care, protection and wellbeing of Children. This is our Statement of Commitment:

The Church is committed to the safety and wellbeing of Children.

We believe all Children have the right to feel safe – culturally, physically, emotionally, and spiritually.

We acknowledge the essential role each Governance Group member, pastor, staff member and volunteer have in creating inclusive, respectful, culturally safe, and loving environments that promote equity, champion personal and spiritual growth, and foster a sense of belonging and acceptance.

We support Children in feeling safe, being respected, and having their voices heard. Our commitment is to ensure they feel a sense of belonging and recognise their value in the eyes of God and the Church.

We are committed to:

- Promoting a culture of child safety and wellbeing throughout the church.
- Listening to the voices of Children and ensuring their rights and dignity come first when we interact with them.
- Providing safe environments and ministries that are culturally safe, inclusive and loving to help foster connections and belonging.
- Ensuring we have a child safe safeguarding culture that resembles and represents Christ's attitude and approach.
- Having zero tolerance for any form of conduct that would amount to Reportable Conduct or that would Harm a Child.

The Church is committed to fulfilling our responsibilities of the *Child Safe Organisations Act 2024*.

5. Definitions

Blue Card – A card issued by Queensland Government Blue Card Services under the *Working with Children (Risk Management and Screening) Act 2000 (Qld)* confirming that a person has received a positive notice and is eligible to work in regulated child-related activities. Reference to a Blue Card in this Policy includes an Exemption Card where applicable.

Blue Card Coordinator – The person appointed by Forest Lake Baptist Church to administer and monitor compliance with Queensland’s Blue Card system. This includes verifying and recording Blue Cards prior to commencement of ministry, maintaining the Blue Card Register and Portal, monitoring expiry dates and status changes, and escalating any non-compliance or adverse notifications to the Safe Spaces Coordinator and the Church Governance Group. The Blue Card Coordinator may also act as the Blue Card Contact Person unless another individual is nominated.

Blue Card Contact Person – The individual nominated in the Blue Card Services Portal as the organisation’s authorised contact for Blue Card matters.

Child / Children – A person under 18 years of age.

Child Safe Organisation – An organisation required under the *Child Safe Organisations Act 2024 (Qld)* to implement and comply with the Child Safe Standards and the Universal Principle to ensure children are safe and well.

Church – Forest Lake Baptist Church and all associated ministries, programs, services and activities conducted onsite, offsite or online.

Church Governance Group – The collective governing authority of Forest Lake Baptist Church comprising the **Eldership and Ministry Council** as established under the Church Constitution.

Within this structure:

- The **Eldership** provides spiritual oversight and leadership.
- The **Ministry Council** provides governance oversight, including policy approval, compliance, financial stewardship and risk management practices.

Together, these bodies hold ultimate accountability for compliance with the *Child Safe Organisations Act 2024 (Qld)* and the *Working with Children (Risk Management and Screening) Act 2000 (Qld)*, and for embedding child safety into the governance, culture and decision-making of the Church.

Cultural Safety – An environment in which children, including Aboriginal and Torres Strait Islander children and children from culturally and linguistically diverse backgrounds, feel

safe, respected, valued, included and able to participate without fear of discrimination or harm.

Disqualified Person – A person who, under the *Working with Children (Risk Management and Screening) Act 2000 (Qld)*:

- has been convicted of a disqualifying offence;
- is a reportable offender under the *Child Protection (Offender Reporting and Offender Prohibition Order) Act 2004*;
- is subject to an offender prohibition order;
- is prohibited by a court from applying for or holding a Blue Card; or
- is subject to a sexual offender order under the *Dangerous Prisoners (Sexual Offenders) Act 2003*.

A Disqualified Person cannot apply for or hold a Blue Card.

Disqualifying Offence – An offence prescribed under the *Working with Children (Risk Management and Screening) Act 2000 (Qld)* as a disqualifying offence, including equivalent offences under another jurisdiction.

Equity – The removal of barriers and provision of appropriate supports so that all children can safely participate, belong and flourish, recognising diverse backgrounds and circumstances.

FLBC – Used interchangeably with Forest Lake Baptist Church and the Church.

Harm – As defined in the *Child Safe Organisations Act 2024 (Qld)*, harm to a child is any detrimental effect of a significant nature on a child's physical, psychological or emotional wellbeing, whether caused by a single act or omission, or a series of acts or omissions, including abuse, neglect, sexual abuse or exploitation.

Parent – A custodial parent or lawful guardian of a child.

Person of Concern – A person whose past behaviour, criminal history, adverse screening outcome or demonstrated boundary violations indicate they may pose a risk to the safety of children or vulnerable persons. A Person of Concern may require a documented risk assessment and management plan to limit participation in Church activities in accordance with safeguarding best practice.

Restricted Person – A person who:

- holds a negative notice;
- has a suspended or cancelled Blue Card;
- is a Disqualified Person; or
- has been charged with a disqualifying offence that has not been finalised.

A Restricted Person must not engage in regulated child-related activities except as permitted under law.

Restricted Employment – Circumstances defined under the *Working with Children (Risk Management and Screening) Act 2000 (Qld)* where a person is prohibited from working in regulated child-related employment. Forest Lake Baptist Church will strictly comply with all legislative restrictions and exemption categories.

Reportable Conduct – As defined in the *Child Safe Organisations Act 2024 (Qld)*, includes:

- a child sexual offence;
- sexual misconduct involving a child;
- ill-treatment of a child;
- significant neglect of a child;
- physical violence against or in the presence of a child; or
- behaviour that causes significant emotional or psychological harm to a child.

Safeguarding – The policies, procedures and practices implemented to prevent harm and promote the safety and wellbeing of children.

Stakeholders – Individuals who interact with ministries involving children, including parents, carers, visitors and contractors.

Trauma-Informed – An approach that recognises the impact of trauma and responds in ways that promote safety, dignity, empowerment and healing while avoiding re-traumatisation.

Vulnerable Adult – A person aged 18 years or over who may be unable to protect themselves from harm or exploitation due to age, disability, illness, trauma or other disadvantage.

6. Role Definitions and Responsibilities

Contractor – A person (paid or unpaid) engaged by the Church to provide services who may have contact with children.

Head of Entity – For the purposes of the Reportable Conduct Scheme under the *Child Safe Organisations Act 2024 (Qld)*, the Head of Entity at Forest Lake Baptist Church is the Senior Pastor (currently Mark Mackay), unless formally delegated in accordance with legislation.

Junior Volunteer (Under 18 Years) – A volunteer under the age of 18 serving under the supervision of an approved adult leader. Junior volunteers must be appropriately supervised and trained.

Ministry Leader – A staff member or volunteer responsible for leading a ministry, program or activity involving children and ensuring compliance with this Policy within that ministry.

Parent Volunteer – A parent or legal guardian volunteering in a ministry in which their child participates, subject to legislative exemptions and safeguarding requirements.

QB Pastoral Leader – An accredited Queensland Baptist Pastoral Leader recognised by Queensland Baptists.

Safe Spaces Coordinator (currently Ps. Seb Henley) – The person appointed by the Church Governance Group to oversee the practical implementation of this Policy, coordinate safeguarding processes, manage responses to incidents or Reportable Conduct, and report to the Church Governance Group.

Safe Spaces Team (formerly known as Safe Children Committee) – A team appointed by the Church Governance Group to assist the Safe Spaces Coordinator in implementing, monitoring and reviewing safeguarding systems, policies, risk assessments and training.

Team Member – Any paid staff member or volunteer who has contact with children as part of Church ministries.

7. Policy

7.1 Child Safe Standard 1: Leadership and Culture

The Church Governance Group is committed to cultivating a culture of safety, ensuring that all individuals involved in or attending the Church are safe and free to grow in their relationships with God and others. The Governance Group is responsible and accountable for cultivating a culture of child safety and cultural safety within the Church.

Code of Conduct

We recognise that everyone is important to God, and therefore to us. All care is taken by the Church to provide a safe environment for all involved in our ministries. As well as a Code of Conduct for staff and volunteers, the Church has expectations for children, parents, carers and visitors whilst attending or interacting in our ministries.

These Codes of Conduct define expectations relating to standards of behaviour for all people involved with the Church and our ministries. These provide clear guidelines about what is expected, the consequences of not meeting these expectations, and information on how to report inappropriate behaviour.

These Codes of Conduct will be:

- part of the selection and training process for working or volunteering at the Church;
- used to set expectations for cultural safety;
- visible to any guests or visitors participating in ministries or activities involving Children; and
- reviewed by the Church Governance Group and Safe Spaces Team on an annual basis.

Refer to: FLBC Safe Spaces and Safeguarding Supporting Documents for our Staff and Volunteers Code of Conduct, Pursuit Youth Code of Conduct and our Kids Ministries Code of Conduct

Governance Leadership

The Church recognises that strong governance is essential to child safety, wellbeing, and cultural safety.

This Safe Spaces Safeguarding Policy is approved by the Church Governance Group and provides a clear and consistent framework to guide and support all stakeholders who work with or participate in the life of the Church. The Church Governance Group will seek to achieve strong child safe safeguarding practices by providing leadership that is:

- **Christ-centred** – Following Christ's example of care and protection.
- **Being safe and Legal** – Upholding the Church Constitution and complying with Government Legislative requirements.
- **Healthy and Well-led** – Having a clear mission of the Church and a strong commitment to Safeguarding.

The Church Governance Group will actively incorporate this Policy and its framework (including associated policies, procedures, guiding principles, and resources) into its broader decision making to fulfil the obligations of the *Child Safe Organisations Act 2024*. Specifically, it will ensure the implementation of the 10 Child Safe Standards and the Universal Principle of cultural safety to ensure that child safety and cultural safety are foundational to the Church and our ministries.

The Governance Group and Safe Spaces Coordinator/s will continually consider and identify potential risks of harm to Children and implement safeguarding strategies to minimise these risks. Should a harm be reported, they will act quickly and ensure everyone knows their right to be safe and heard.

The Safe Spaces Team at Forest Lake Baptist Church exists to support the Governance Group and Safe Spaces Coordinator/s in overseeing the proper implementation of this Policy and associated procedures and to ensure that FLBC maintains a strong culture of child safety where children can flourish to the fullest extent possible. The Safe Spaces Team includes parent representatives from the congregation, the Senior Pastor, the Families and Kids Coordinator, the Pastor overseeing Youth, a Ministry Council representative, and an older member of the congregation.

Refer to: FLBC Safe Spaces and Safeguarding Supporting Documents for the Safe Spaces Team Charter.

7.2 Child Safe Standard 2: Voice of Children

The Church believes the safety and wellbeing of Children is enhanced when they are informed, heard, and respected in matters that affect them. Their voices are essential for creating trusted and welcoming spaces where they feel safe, valued and included. The Church must seek to implement age-appropriate and culturally safe guidelines, including with whom and how concerns can be raised.

The Church should create opportunities for Children to safely share feedback and participate in decision making that might strengthen child safety, cultural safety and inclusion as well as contribute to wider Church life. Staff and volunteers should be trained to listen well, recognise the risk of Reportable Conduct or Harm occurring, be culturally sensitive, and respond appropriately.

At Forest Lake Baptist Church, we intentionally embed **Child Safe Standard 2 – Voice of Children** into our leadership culture, ministry rhythms and physical environments.

We do this in the following ways:

Leadership Training (Teams Day)

At the beginning of each ministry year, all leaders participate in Teams Day training. This includes equipping leaders to actively listen to children, recognise their inherent dignity as image bearers of God, and treat them as fully valued individuals. Leaders are trained to create environments where children feel heard, respected and safe to express their thoughts and concerns.

Refer to: FLBC Safe Spaces and Safeguarding Supporting Documents for Teams Day Training Materials.

Term Ministry Rhythms (“Voice Time”)

Each term, within our children’s and youth small group settings, intentional space is created for children and young people to provide feedback, share ideas and express their views about ministry programs and activities. These discussions are structured and guided to ensure they are safe, age-appropriate and respectful.

Refer to: FLBC Safe Spaces and Safeguarding Supporting Documents for FLBC Guidelines for Voice Time

Visible Communication of Rights

FLBC ensures children are informed of their rights in clear and accessible ways.

- A “Know Your Rights” poster is displayed in Kidzone and Bumblebees ministry rooms.
- At Pursuit Youth, a slide outlining children’s rights and pathways for raising concerns is displayed at the beginning of each youth gathering.

Through these practices, FLBC seeks to ensure children are informed, heard, and taken seriously in matters affecting them.

Refer to: FLBC Safe Spaces and Safeguarding Supporting Documents for Know Your Rights Poster and Pursuit Youth – Know Your Rights Slide.

7.3 Child Safe Standard 3: Family and Community

The Church believes the safety and wellbeing of Children is strengthened and most effective when all stakeholders are informed, involved and working together.

The Church must ensure child safe safeguarding policies and procedures are easily accessible. Families, carers, and communities are encouraged to raise issues of concern and provide feedback on practices.

The Church seeks to partner with families, including Aboriginal, Torres Strait Islander and CALD families, to ensure child safe safeguarding reflects their perspectives and needs.

At Forest Lake Baptist Church, we intentionally embed Child Safe Standard 3 – Family and Community into our leadership culture, ministry rhythms and physical environments.

We are committed to transparency, partnership and active engagement with families and the wider church community to promote child safety and wellbeing.

We do this in the following ways:

1. **Regular Communication with Parents**
 - We provide regular email communication to parents outlining program content, expectations and key information.
 - Termly updates reinforce our commitment to child safety and invite ongoing partnership.
2. **Accessible Policies and Risk Assessments**
 - Our Policy, Codes of Conduct and relevant safeguarding documents are accessible to families by finding them on our Church's website
 - Annual risk assessments for Kidzone, Bumblebees and Pursuit Youth are emailed to parents.
 - Risk assessments for special events (e.g. youth camp, away nights, roller skating, ice skating, swimming events, etc.) are sent to parents in advance.
3. **Parent Feedback Opportunities**
 - Feedback links and forms are available on our website.
 - Each term, parents are invited via email to provide feedback regarding safety, wellbeing and ministry practice.
 - Feedback is reviewed by the Safe Children Committee and informs continuous improvement.
4. **Congregational Transparency and Review**
 - Safeguarding reviews are undertaken regularly through the Safe Spaces Team (formerly known as Safe Children Committee)
 - [Refer to: FLBC Safe Spaces and Safeguarding Supporting Documents for Safe Spaces Team Charter Document.](#)
 - Key outcomes and improvement actions may be shared at Members' Meetings and leadership gatherings to ensure accountability and invite community feedback.
5. **Engagement with the Broader Community**
 - We seek to strengthen our engagement with local Aboriginal and Torres Strait Islander communities as part of our commitment to cultural safety under the Universal Principle.
 - We aim to grow in listening, learning and building respectful relationships within our local context.

Through these practices, FLBC seeks to ensure families are informed, involved and confident that child safety is a shared and visible priority within our church community.

7.4 Child Safe Standard 4: Equity and Diversity

The Church must provide safe environments that are inclusive, accessible and respectful to the unique needs of all Children.

The Church should collaborate with Children and their families/carers to understand their diverse needs. The Church should ensure staff and volunteers are trained appropriately to provide supportive, trauma-informed and culturally safe environments for them, including processes for speaking up if they feel unsafe or have a concern.

Refer to: FLBC Cultural Safety and Equity Policy.

7.5 Child Safe Standard 5: People

Recruitment and Selection of Staff and Volunteers

The Church recognises the importance of recruiting staff and volunteers who have the right gifts, skills, and abilities to fulfill their roles. Whilst this is important for all roles in the Church, we especially acknowledge this importance with roles working with Children. To ensure this, the Church must screen and train all staff, leaders and volunteers involved in any ministry, program or activity of the Church. All staff and volunteers are to be recruited, selected and inducted in accordance with the Procedure for Recruitment and Selection of Staff and Volunteers.

Compliance with Queensland's Blue Card Laws

The Church must ensure it has a clear procedure for compliance with the Blue Card System under the *Working with Children (Risk Management and Screening) Act 2000*. Unless a statutory exemption applies (e.g. for Parent Volunteers in some circumstances), all staff and volunteers involved in any ministry, program or activity of the Church who have contact with Children must hold a valid Blue Card (or Exemption Card). ***No card, no start!*** **All Governance Group Members must hold a valid blue card.**

Before a staff member or volunteer commences in a ministry role with Children:

- the Safe Spaces Safeguarding Coordinator **must sight** the Blue Card holder's valid Blue Card (or Exemption Card), alongside additional identification;
- the Church must record the Blue Card (or Exemption Card) details and required information in the Blue Card Register; and
- all Blue Cards must be linked to the Church's Blue Card Portal.

The Church must regularly maintain the Blue Card Portal and Blue Card Register.

Management of Standards of Behaviour for Staff and Volunteers

The Church expects all staff and volunteers to uphold this Policy and the relevant Code of Conduct(s), which provide clear guidelines on expected behaviour when working with Children and the consequences of not meeting these expectations.

The Church also expects staff and volunteers to provide safe environments and follow the Guidelines for Creating Safe Environments. Any breaches of these standards will be dealt with under Child Safe Standard 6: Complaints and Concerns.

Refer to: FLBC Safe Spaces Safeguarding Procedures.

7.6 Child Safe Standard 6: Complaints and Concerns

Forest Lake Baptist Church is committed to ensuring that complaints and concerns are responded to promptly, fairly, respectfully and in a manner that prioritises the safety and wellbeing of Children.

An accessible, child-focused complaints handling process exists to ensure concerns are taken seriously and managed appropriately.

Commitment

The Church:

- Encourages any person to raise concerns about child safety, conduct, or ministry practices.
- Will treat all complaints seriously.
- Will respond in a manner that is child-focused, trauma-informed and culturally safe.
- Has zero tolerance for Reportable Conduct or Harm.
- Will comply with all mandatory reporting obligations.

Foundational Principles

Complaint handling at FLBC is guided by:

- **Natural Justice** – All parties are treated fairly and impartially.
- **Duty of Care** – The safety and wellbeing of Children is paramount.
- **Humanity and Dignity** – All individuals are treated respectfully.
- **Trauma-Informed Practice** – Processes seek to avoid re-traumatisation.
- **Non-Retaliation** – No person will be disadvantaged for raising a concern in good faith.

Who May Make a Complaint

A complaint may be made by:

- A Child
- A parent or carer
- A staff member or volunteer
- A member of the congregation
- Any member of the public

Complaints may be made verbally or in writing and may be reported to a Ministry Leader, Safe Spaces Team member, Safe Spaces Coordinator, Church Governance Group member or any staff member.

Children will be supported to raise concerns in age-appropriate ways and may have a support person present.

Categories of Complaints

Complaints may include:

- Concerns about ministry operations or risk management;
- Alleged breaches of the Code of Conduct;
- Alleged breaches of this Policy;
- Allegations of Harm or Reportable Conduct.

Complaints are managed according to their seriousness, including minor, major and critical matters.

Reporting and External Authorities

Where a complaint involves suspected Harm or Reportable Conduct:

- Immediate steps will be taken to ensure child safety.
- Mandatory reporting obligations will be followed.
- The Head of Entity (Senior Pastor) will notify the Queensland Family and Child Commission within 3 business days of becoming aware of a reportable allegation, in accordance with the *Child Safe Organisations Act 2024 (Qld)*.
- Police and Child Safety will be notified where required.

The Church will cooperate fully with statutory authorities and will not prevent or discourage any person from contacting external authorities directly.

Integration with Reporting Harm Procedure

Where a complaint involves suspected Harm, abuse, neglect or Reportable Conduct, the matter will be managed in accordance with the Church's **Procedure for Responding to Child Protection Concerns and Reporting Harm**, in addition to this Complaints Framework.

The Reporting Harm procedure outlines mandatory reporting pathways, escalation requirements, and statutory notification obligations. Where such matters arise, those procedures take precedence over internal complaint resolution processes.

Roles and Accountability

- **Ministry Leaders** are responsible for responding to minor complaints and escalating concerns appropriately.
- **Safe Spaces Coordinator** oversees major and critical complaints and ensures compliance with reporting obligations.
- **Church Governance Group** provides oversight and accountability.
- **Head of Entity** fulfils obligations under the Reportable Conduct Scheme.

Record Keeping

All complaints will be documented and stored securely in accordance with Safe Spaces Recordkeeping Guidelines. Records relating to serious safeguarding matters will be retained in accordance with legal obligations and best practice.

Refer to: FLBC Safe Spaces and Safeguarding Procedures – Complaints Handling Procedure and Queensland Baptist Ethical Issues Response Guidelines.

7.7 Child Safe Standard 7: Knowledge and Skills

The Church acknowledges the importance of providing initial and ongoing training and support to staff and volunteers.

Training and Knowledge

All staff and volunteers who have contact with Children must undertake mandatory safeguarding training as part of their induction, as well as annual refresher training. This includes training on definitions of abuse, reporting obligations, risk management, cultural safety, trauma-informed care and reporting, duty of care, record keeping, information sharing, positional power, transparency and accountability, and protecting vulnerable people.

The Safe Spaces Coordinator is responsible for ensuring that a structured annual training plan is implemented and that accurate records of training attendance and completion are maintained.

At FLBC, annual safeguarding training is delivered through an in-person Teams Day, with an approved online option available for those unable to attend in person. This training fulfils the Church's Safe Spaces safeguarding training requirements and covers the areas outlined above.

Support

The Church recognises that stakeholders may require support when dealing with issues such as behaviour management, racism, discrimination, conflict, bullying, child protection concerns, or breaches of this Policy. As such, the Safe Spaces Coordinator and Church Governance Group will ensure support is available.

The types of support that may be made available include:

- partnering with external support services (for example, external counselling services or cultural safety advisors);
- seeking guidance and advice from the Church's workplace health and safety officer(s);
- seeking guidance and advice from Queensland Baptists Safe Spaces Team or Professional Standards Officer;
- providing additional training;
- implementing mentoring or discipleship; or
- mediation or other conflict resolution techniques.

Refer to: FLBC Safe Spaces and Safeguarding Procedures – Procedure for Training and Support of Staff and Volunteers

7.8 Child Safe Standard 8: Physical and Online Environments

The Church takes a holistic approach to ensure that physical, spiritual, emotional, and online environments promote safety and wellbeing and minimise the opportunity for Children to be harmed. The Church should ensure feedback regarding child safety safeguarding matters is welcomed so that risks can be identified early and the appropriate improvements made. The Church should ensure staff and volunteers are adequately trained to identify the early signs of risks, including risks in child-to-child and adult-to-child interactions.

Safe Physical Environments

- The Church will comply with Workplace Health and Safety requirements as well as consider the impact of the physical environment on the potential for risk especially to Children.
- If the Church property has any residential facility on or adjacent to the Church property that is under direct management and control of the Church (including private rental) then the Church will ensure that all regular adult occupants of that property hold a current Blue Card for the duration of their residence.
- The Church will consider whether any ministries it supports, including overseas ministries, have appropriate child protection policies in place. (If you are a charity this is a requirement under the Australian Charities and Not-for-profits Commission [ACNC] external conduct standards.)
- The Church takes all incidents seriously and will report all physical incidents where first aid was required as per outlined in the FLBC Safe Spaces and Safeguarding Procedures

Safe Spiritual and Emotional Environments

- The Church acknowledges and respects the diverse cultural, religious and family beliefs of each Child.
- The Church desires for all people to feel safe in any of our ministries. The Church will work with Children and parents or carers to help create supportive and inclusive ministries.
- It is important to us that Children feel safe at all times during our ministries. Should they feel unsafe at any point, there are clear guidelines in place as to who they can speak to.

Safe Online Environments

- The Church will promote safe online behaviour in any electronic communication.
- In accordance with the *Online Safety Amendment (Social Media Minimum Age) Act 2024*, the Church will not use social media platforms to communicate directly with children under 16 years of age.
- In accordance with current privacy laws, the Church will seek permission to use media (photos, media, etc.) in marketing and promotion and will ensure these remain the property of the Church and are used only within the law.
- The Church promotes the use of safe, approved applications for Children to learn, communicate and seek help.

- Families and carers are informed, in simple and culturally appropriate ways, about the Church's use of online platforms and safety tools.

Refer to: Guidelines for Creating Safe Environments and FLBC Safe Spaces and Safeguarding Supporting Documents - Social Media Policy.

Risk Management

a. Managing Persons of Concern

A Person of Concern as defined in *An Australian Baptist Response to Persons of Concern* is someone who:

- has pleaded guilty to, been convicted of, or has admitted to a sexual criminal offence;
- has been found to have sexually offended, arising through due diligence checks related to recruitment (screening);
- is currently charged with a sexual offence (including sexual misconduct);
- has been the subject of an allegation of a sexual offence or misconduct which has not been appropriately investigated in accordance with the relevant state association's procedures; or
- has been found to have received an adverse risk assessment conducted in accordance with the relevant state association's procedures that arises from sexual misconduct or repeated wandering across other people's sexual boundaries.

A Christian congregation can be one of the few places where Persons of Concern, as the recipients of God's forgiveness, can mix with a Christian community. However, that forgiveness does not mean immunity from temptation to re-offend.

Because the Church is committed to providing a safe space for Children, should a Person of Concern be identified within the Church, the Safe Spaces Coordinator and Senior Pastor, in consultation with the QB Professional Standards Officer, will assess and manage any person identified as a Person of Concern in accordance with *An Australian Baptist Response to Persons of Concern*.

Refer to: FLBC Safe Spaces and Safeguarding Supporting Documents - An Australian Baptist Response to Persons of Concern.

b. Risk Assessments and Management Plans

The Church will ensure that Ministry Leaders assess the risks and complete a Risk Management Plan in relation to any Children programs or activities undertaken at, for or with the Church:

- For regular activities, the assessment will be conducted at least annually and whenever there are significant changes in the program activities, attendance or location.
- For each high-risk activity or special event, the ministry leader will complete an activity specific risk assessment.

All Risk Management Plans in relation to any Children are to be approved by the Secretary beforehand and communicated with relevant staff and volunteers to ensure appropriate safe standards are met.

The Safe Church Coordinator and ministry leaders will ensure that appropriate and reasonable precautions are adopted to address risks identified as part of a risk assessment. When considering what measures are appropriate, ministry leaders will consider the likelihood of an incident occurring, the seriousness of the consequences, and the difficulty of avoiding the risk.

c. Incident Management – Responding and Reporting

The Church is committed to providing a safe environment for all. Part of this process is ensuring that:

- incidents, whether potential or actual, are responded to in an appropriate way; and
- reporting and analysing occurs to ensure the incident does not happen again.

All incidents (including accidents and disclosures) whether suspected, perceived, potential or actual, will be managed through the Procedure for Responding to an Incident (Minor or Critical) and recorded on the Church's Incident Response Form.

Refer to: FLBC Safe Spaces and Safeguarding Procedures.

Third Parties and Affiliated Entities

The Church will require any third party (tenant or external party using Church property) that provides services to Children to provide a copy of their Child Safety and Wellbeing Policy at least annually.

The Church will ensure that any affiliated entities (any entity or program that is, or is represented as, a ministry of the Church) comply with the *Child Safe Organisations Act 2024* and provide annual reports to the Church Governance Group regarding their Child Safety and Wellbeing Policy.

7.9 Child Safe Standard 9: Continuous Improvement

The Church is committed to continually strengthening our child safe safeguarding culture through regular reflection, learning and growth. The Church must review what is working well and where improvements are needed by listening to the voices of children, families, staff, volunteers, and trusted external stakeholders. Complaints, concerns and incidents should be analysed by the Safe Spaces Coordinator and Governance Group to resolve immediate issues and to identify patterns and systemic risks.

Reviews

a. Internal Review

The Church through the Safe Spaces Team will review this policy annually, using the *Checklist for Annual Internal Review* and seeking input from staff, volunteers and stakeholders to which the policy applies.

b. External Review

The Church may seek advice from and communicate with the specialised team available through QB Church Services in regard to:

- Any Child Protection Concerns – contact safespaces@qb.org.au
- Any Safeguarding Policy advice and support – contact safespaces@qb.org.au
- Any complaints in regard to QB Pastoral Leaders – contact ps@qb.org.au
- Any knowledge of a Person of Concern within the Church – contact ps@qb.org.au

Accountability

Governance Group members and Safe Spaces Coordinators are responsible for the continuous improvement and implementation of this Policy. The Church is committed to ensuring the progress of the implementation of this Policy:

- is continually measured and documented;
- is reported to the Church Governance Group Members and Church membership (e.g. at Annual General Meetings); and
- addresses immediately any systemic failures identified.

By doing so, the Church builds a culture that adapts to new challenges, strengthens inclusion, and prioritises the safety and wellbeing of all Children.

For more details, please see: *Guidelines for Continuous Improvement*.

7.10 Child Safe Standard 10: Policies and Procedures

The Church must ensure this Policy along with its associated policies, procedures and guidelines embed the 10 Child Safe Standards and the Universal Principle. The Church is committed to documenting our child safe safeguarding commitments in ways that are clear, practical, easy to understand and accessible.

Policies and Procedures

The Church is committed to ensuring all child safe safeguarding policies and procedures guide our daily decisions when interacting with Children. The Church should prioritise modelling best practice when meeting our legal and ethical obligations as a child-safe and culturally safe organisation.

The Church must ensure our Child Safe and Wellbeing Policy includes commitments to child safety, cultural safety, inclusion, and continuous improvement, which promote respectful, inclusive practices in our ministries involving Children.

Information Sharing and Record Keeping

The Church will comply with the recordkeeping requirements of the *Child Safe Organisations Act 2024*, the Blue Card system and with the Safe Spaces Recordkeeping Guidelines that are informed by the *Guiding Principles of the Queensland Baptists Data Retention and Destruction Policy* (Clauses 2.4 and 4.5).

The Church will retain records in alignment with the Safe Spaces Recordkeeping Guidelines. Staff and volunteers are trained to understand their responsibilities for accurate, timely and secure record keeping, including when information may need to be shared to protect a Child. The Church does this by:

- keeping records that contain, or may contain, sensitive information in a manner that protects confidentiality and will only be accessed by a limited number of authorised persons;
- holding hard copy records in a secure location with proper consideration of access and physical conditions;
- monitoring electronic records to ensure security and ongoing accessibility; and
- reviewing recordkeeping and information sharing processes regularly to ensure they remain effective for safeguarding children.

8. Universal Principle: Cultural Safe Environments for Aboriginal and Torres Strait Islander people

The Church acknowledges the importance of cultural safety. We commit to creating safe spaces where children feel welcomed, valued, included and respected, while also supporting the safety of children from Aboriginal and Torres Strait Islander as well as from other Culturally and Linguistically Diverse (CALD) backgrounds.

In God's wisdom and love, our Heavenly Father appointed the Aboriginal and Torres Strait Islander peoples to be custodians of the land on which we live and worship. On this land, they met for generations, and we thank their leaders, past and present, for their stewardship of this land. As we now live together and minister together, we pray that God would unite us all in the knowledge of his Son, Jesus Christ, in whom and for whom all things were created.

Refer to: FLBC Cultural Safety and Equity Policy

9. Responsibilities and Review

Church Governance Group – Approve the policy, instigate an annual audit to ensure compliance, and oversee effective implementation of these processes.

Safe Spaces Coordinator and Team – Manage the practical implementation of the Safe Spaces Safeguarding Policy and conduct an annual audit and review.

10. Approval & Next Review

Policy Owner: Sebastian Henley (FLBC Associate Pastor: Safe Spaces Coordinator)

Approved by: Trevor Jones (FLBC Secretary on behalf of Ministry Council)

Approval Date: [18/03/2026]

Next Review Date: [18/03/2027]

This Policy will be reviewed at least once a year, or sooner if there are changes in legislation, the Child Safe Standards, the Universal Principle, or Church activities.