



# Child Protection Policy

Gateway Church (Australia) Limited

Revised: December 2025

## 1. Definitions

In this policy, the following definitions apply:

**Child/children:** any person under the age of 18, or a person between the ages of 18 and 19 who attends a Gateway program as a participant.

**Gateway:** any churches, ministries, programs – including overseas programs – run by Gateway Church (Australia) Limited, regardless of state or country of operation.

**Staff and/or Volunteers:** any Pastors, paid staff, elders, volunteers, interns, consultants, special guests and contractors engaged by Gateway.

**Gateway Leadership:** The Senior Pastor, Directors, Elders, or any member of the Gateway Church (Australia) Board.

**Child Safety Officer:** the designated person responsible for coordinating child safety compliance and serving as the primary contact for child safety matters.

**Child abuse:** harm to a child. This includes, but is not limited to:

**Physical Abuse:** Physical abuse occurs when a person intentionally or recklessly uses physical force against, with or in the presence of a child, which causes or could cause harm to the child. Physical abuse includes hitting, punching, kicking, pushing, striking a child with an object, or threatening a child with harm.

**Sexual Abuse:** Any sexual act or sexual threat committed against, with or in the presence of a child. This includes sexual offences and sexual misconduct, spanning from inappropriate touching to penetration, exposing a child to pornography, using sexualised language, grooming, or any other conduct of a sexual nature.

**Emotional and Psychological Abuse:** Any behaviour that significantly harms a child's emotional or psychological wellbeing. This may involve conveying to a child that they are worthless, unloved, inadequate or rejected, causing a child to frequently feel frightened or in danger, or sustained patterns of hostile, degrading, or humiliating treatment.

**Neglect:** Failure to provide for a child's basic physical, emotional, medical, or educational needs, including adequate supervision, nutrition, healthcare, emotional nurture, and safe housing.

## 2. Principles and Commitments

1. Gateway is committed to the safety and wellbeing of all children. Every child under the care of Gateway will be treated with dignity and respect, regardless of race, colour, sex, language, religion or belief, political or other opinion, ethnic or social origin, disability, sexual orientation, gender identity, birth, Aboriginal or Torres Strait Islander heritage, or other status.
2. Gateway has zero tolerance for child abuse. We are committed to providing a child safe environment where children feel safe, are listened to, and their voices are heard regarding decisions that affect their lives.
3. Gateway implements the 11 Victorian Child Safe Standards and complies with the Reportable Conduct Scheme. All staff and volunteers will familiarise themselves with this policy and relevant ministry guidelines. Compliance with these standards protects children, staff, and volunteers, and provides accountability and transparency in our child safety practices.
4. Gateway will adopt evidence-based policies and best practices to prevent child abuse and will comply with all relevant legislation on child rights and welfare. This includes mandatory reporting to appropriate authorities, the Commission for Children and Young People (CCYP), Victoria Police, state child protection services, and other regulatory bodies within statutory timeframes.
5. Child safety and wellbeing is embedded in Gateway's organisational leadership, governance, and culture. Gateway Leadership is accountable for creating and maintaining systems that protect children and responds appropriately to child safety risks.

## 3. Cultural Safety and Inclusion

1. **Cultural Safety for Aboriginal and Torres Strait Islander Children:** Gateway is committed to establishing a culturally safe environment where the diverse and unique identities and experiences of Aboriginal and Torres Strait Islander children and young people are respected and valued. We are committed to ensuring Aboriginal children feel safe expressing their culture and identity within our programs.
2. Gateway encourages all children to express their culture and explore their cultural rights. We acknowledge that children from culturally and linguistically diverse backgrounds may face additional barriers to safety and participation, and we work to address these through appropriate support and advocacy.
3. Gateway is committed to upholding equity and respecting diverse needs in policy and practice. Children who are unable to live at home, children with disability, and children who identify as LGBTIQA+ are provided appropriate support.
4. Gateway encourages children to have their voices heard, particularly on matters important to them.

## 4. Communication, Education, and Family Engagement

1. Gateway is committed to educating staff and volunteers about child protection and the Child Safe Standards through induction and ongoing professional development.
2. This policy and ministry guidelines are reviewed and updated every two years at a minimum, or more frequently if required by legislative changes or identified risks.
3. All staff and volunteers working with children must complete initial training on this policy and applicable ministry guidelines upon commencement. Regular refresher training is required, with frequency determined by role and risk level.

4. Failure to maintain compliance requirements (including current Working with Children Check or completion of mandatory training) will result in immediate suspension from child-related activities until requirements are met. Persistent non-compliance may result in termination of the role.
5. **Family and Community Partnership:** Gateway seeks meaningful partnership with parents, guardians, families, and communities in promoting child safety. Families are welcome to view our child safety policies, programs, and complaints processes.
6. Email and phone contacts are available through the Gateway website and app for parents and children to raise questions or concerns about our programs. All child safety policies are accessible via the Gateway app in the Youth and Godzone sections, and program information is available for parental review.
7. As a public venue, Gateway acknowledges a duty of care to any child who arrives at our programs. While we seek parental consent for ongoing participation, we will not turn away a child in need of support.

## 5. Code of Conduct and Behavioural Expectations

1. All staff and volunteers must treat children with dignity and respect. Inappropriate, harassing, abusive, sexually provocative, or demeaning language or behaviour toward children will not be tolerated and will result in immediate action including possible termination and reporting to authorities.
2. All staff and volunteers working with children must sign Gateway's Child Safety Code of Conduct, acknowledging they:
  - a) have read and understood the Child Safety Code of Conduct and associated ministry guidelines;
  - b) will respect and follow these guidelines in all interactions with children;
  - c) understand that failure to comply may result in disciplinary action including suspension, termination, and notification to Victoria Police, the CCYP, or other regulatory bodies.
3. Discipline of children must be age-appropriate and focus on positive behaviour guidance. Permitted approaches include verbal redirection, natural consequences, and temporary withdrawal of privileges. Corporal punishment is strictly prohibited. Specific ministry guidelines outline appropriate discipline procedures for each age group.
4. A minimum of two adults must be present when working with children whenever possible. Where one-on-one interaction is necessary, it must occur in visible, public spaces. The 'Three-Person Rule' applies when escorting children to toilets: one adult and two children for primary school aged children; two adults and one child for younger, non-verbal children.
5. Transportation of children by church personnel must comply with specific ministry guidelines and is regularly reviewed by the Child Safety Officer. Appropriate insurance, vehicle safety standards, and child supervision ratios must be maintained.
6. No adult will sleep in proximity to children unless another adult is present at all times. Overnight activities require specific risk assessments and enhanced supervision protocols.
7. Sexual activity or sexual conduct with children is absolutely prohibited. Adults are always responsible for maintaining appropriate boundaries and cannot attribute responsibility to a child regardless of the child's behaviour or presentation.
8. Gateway's computers, networks, mobile devices, cameras, and digital equipment must be used appropriately and will not be used to exploit, groom, or harass children, or to access, produce, or distribute child abuse material through any medium. Physical and online environments are designed to promote safety and minimise opportunities for harm.

## 6. Recruitment, Screening, and Suitability

1. Gateway ensures that people working with children are suitable and supported to reflect child safety values in practice. Rigorous recruitment and screening processes apply to all personnel engaged in child-related work, regardless of duration or frequency of contact with children.
2. Any person involved with children (including short-term visitors, guest speakers, contractors, or labour hire workers) must possess a valid Working with Children Check (WWCC) and ensure Gateway is registered as a linked organisation prior to commencing child-related activities. Failure to provide proof of a valid WWCC, or a negative WWCC outcome, prohibits involvement in any child-related activity.
3. All Gateway paid staff must maintain a current WWCC as a condition of employment. A negative WWCC outcome constitutes grounds for immediate termination.
4. Ongoing volunteers in child-focused ministries complete enhanced screening including:
  - a) Completion of a detailed application form including name, date of birth, occupation, and previous experience working with children;
  - b) Verification of WWCC details and ongoing monitoring of WWCC status;
  - c) Provision of two referees, at least one external to Gateway. Where applicants have previous child-related experience, referees from these roles are prioritised;
  - d) Structured referee interviews conducted by trained personnel.
5. Referees are asked specific questions regarding:
  - e) Any formal or informal complaints, investigations, or concerns involving the applicant and children;
  - f) The applicant's suitability for child-focused work;
  - g) Whether the referee would re-engage the applicant in child-related programs.
6. Referees are provided opportunity to express concerns confidentially that they may not wish to document in writing.

## 7. Reporting Obligations and Response Procedures

1. **Mandatory Reporting:** All Gateway staff are mandatory reporters. Any staff member or volunteer who forms a reasonable belief of child abuse or observes reportable conduct must report immediately without fear of repercussion. Reports must be made for:
  - a) Any allegation or reasonable belief that a child is being physically or sexually abused by a parent, caregiver, guardian, or Gateway personnel;
  - b) Any allegation or reasonable belief of inappropriate conduct or relationships between a child and any adult;
  - c) Any behaviour causing significant emotional or psychological harm to a child;
  - d) Any significant neglect of a child's basic needs.
2. **Reportable Conduct Scheme Compliance:** Gateway complies with Victoria's Reportable Conduct Scheme. The head of Gateway (or delegated Child Safety Officer) must be notified immediately of any reportable allegation involving Gateway personnel. Reportable conduct includes:
  - a) Sexual offences committed against, with or in the presence of a child;
  - b) Sexual misconduct committed against, with or in the presence of a child;
  - c) Physical violence against, with or in the presence of a child;
  - d) Behaviour causing significant emotional or psychological harm to a child;
  - e) Significant neglect of a child.
3. **Reporting Timeframes:** When a reportable allegation is made:
  - a) Criminal conduct must be reported to Victoria Police immediately as the first priority;

- b) The CCYP must be notified within 3 business days of becoming aware of a reportable allegation;
- c) Updates must be provided to the CCYP within 30 calendar days and at conclusion of any investigation.

4. **Investigation Process:** Following notification of a reportable allegation, the Child Safety Officer will notify the Gateway Board. The Board will designate an investigator who will:

- a) Treat both the child and the adult involved with dignity and respect throughout the process;
- b) Seek external advice from legal advisors, child safety experts, or regulatory bodies as necessary, maintaining strict confidentiality;
- c) Designate a media liaison and coordinate with Victoria Police where required;
- d) Ensure any conversations with the child occur with a parent, guardian, or appropriate support person present;
- e) Maintain comprehensive, confidential records of all facts, conversations, and evidence;
- f) Notify relevant embassies if foreign nationals are involved;
- g) Present findings and recommendations to the Gateway Board in a formal meeting with full documentation.

5. **Record Management and Disclosure:** Gateway may disclose investigation records to Victoria Police, the CCYP, child protection services, or other regulatory bodies as legally required. When providing references for individuals who have been subject to child abuse investigations, Gateway will disclose that an investigation occurred and its findings.

6. **Risk Management During Investigations:** During investigations of allegations against personnel, immediate risk management measures will be implemented, which may include suspension from duties, restriction from child contact, or reassignment, to ensure child safety.

## 8. Child-Focused Complaints and Concerns Process

1. Gateway maintains accessible, child-focused processes for complaints and concerns. Children, families, and community members can raise concerns through multiple channels including direct contact with ministry leaders, the Child Safety Officer, or Senior Pastor.
2. All complaints and concerns are taken seriously and responded to promptly and transparently. Complaints are handled confidentially with information shared only as necessary to ensure child safety and meet legal obligations.
3. Gateway will not victimise or take adverse action against anyone who raises legitimate child safety concerns in good faith.

## 9. Use of Children's Images and Personal Information

When photographing or filming children for church purposes, Gateway staff and volunteers must:

- a) Obtain informed consent from a parent or guardian prior to photographing, filming, or recording a child, with clear explanation of how images will be used and where they will be published;
- b) Assess and comply with local traditions, cultural sensitivities, or restrictions regarding personal images before photographing or filming children;
- c) Ensure all images present children in a dignified, respectful, and safe manner, never in vulnerable, submissive, or inappropriate contexts. Images must be honest representations of context and facts;
- d) Ensure storage and transmission of images, films, and media complies with Privacy Act requirements and other applicable legislation. All media captured by staff or volunteers for church purposes must be stored on Gateway devices, not personal devices;

- e) Regularly review and delete images no longer required for their original purpose.

## 10. Review and Continuous Improvement

1. Gateway is committed to regularly reviewing and improving implementation of the Child Safe Standards. This policy is reviewed every two years at a minimum and updated in response to:
  - f) Changes in legislation or regulatory requirements;
  - g) Identified incidents, complaints, or areas of concern;
  - h) Feedback from children, families, staff, and the broader community;
  - i) Emerging best practice and research in child safety.
2. The Child Safety Officer has a standing action in each weekly leadership meeting to discuss child safety practices across all Gateway ministries, identify risks and remedy potential issues. Any significant changes or recommendations will be to Gateway Leadership and the Board.
3. Gateway maintains documentation demonstrating compliance with the Child Safe Standards and Reportable Conduct Scheme, including policies, procedures, risk assessments, training records, and incident reports.
4. Gateway seeks input from children and families in reviewing and improving child safety practices, ensuring their voices contribute to creating safer environments.

## 11. Policy Implementation and Governance

1. This policy documents how Gateway is safe for children and young people. It reflects Gateway's commitment to embedding child safety in organisational leadership, governance, and culture.
2. The Gateway Board retains ultimate accountability for child safety and oversight of compliance with the Child Safe Standards and Reportable Conduct Scheme.
3. The Senior Pastor and Campus Lead Pastors are responsible for ensuring child safety is prioritised in decision-making and resource allocation within their areas of oversight.
4. The Child Safety Officer is responsible for day-to-day coordination of child safety compliance, training, incident management, and reporting to the CCYP and other regulatory bodies.
5. Gateway actively encourages development and review of ministry-specific child safety guidelines that apply these principles to each unique ministry context, recognising that different age groups and settings require tailored approaches.
6. Gateway recognises the heightened responsibility religious organisations bear in preventing and responding to child abuse. We commit to transparency, accountability, and continuous improvement in all child safety matters.