



National Catholic Safeguarding Standards – Pilot Audits – Summary Report

January 2019

1 Introduction

Catholic Professional Standards Limited (CPSL) was established by the Australian Catholic Bishops Conference (ACBC) and Catholic Religious Australia (CRA) in response to the findings of the Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission), presented on 15 December 2017 to the Governor General of Australia.

As part of its constitutional mandate, CPSL is developing the National Catholic Safeguarding Standards (the Standards) to provide the framework for Catholic Church entities to build safe environments and cultures, and to ensure that safeguarding practices are consistently applied across the Australian Catholic Church. The Standards are designed to be implemented by all Catholic entities, ministries and organisations across Australia, to promote the safety of children through policies and activities to prevent, respond to and report concerns regarding child abuse, and to drive cultural and behavioural change.

CPSL is also in the process of establishing a risk-based audit program to assess compliance with the Standards across all Catholic ministries including dioceses, religious institutes and organisations and entities providing education, health and aged care, social and community services, pastoral care and other services.

As part of the audit program development, CPSL has conducted four pilot audits to trial and refine the audit methodology and to inform the refinement of the Standards.

The four pilot audits were conducted between May 2018 and November 2018. This report provides an overview of the work performed, as well as the learnings and impact on future audits to be conducted by CPSL, once the Standards have been formally issued and rolled out.

The four entities which participated in the pilot audits were invited to contribute feedback on their experiences of the process – this feedback is attached in full as an appendix to this report.

In this report, the following definitions apply:

Church Authority:

- a) the diocesan bishop (or archbishop, as appropriate) of a diocese or his administrator from time to time;
- b) the Australian major superior in respect of religious institutes; or
- c) the canonical steward in relation to a particular Catholic entity in respect of other Catholic entities not referred to in (a) or (b) above.

It is the Church Authority and the entities over which they have governance that are audited under the CPSL audit framework.

2 Background and audit objective

The purpose of the pilot audits was to assess the applicability and robustness of the draft Standards (issued for public comment in April 2018) within two settings – diocese and religious institute.

The audit work reviewed processes in place to understand, identify, evaluate and address safeguarding risks, including implementation, monitoring and reporting of safeguarding practices. The pilots also sought to identify any gaps between the NCSS indicators and the practical application of these on the ground (that is, are the indicators reasonable and measurable? are there any indicators missing? could indicators be clearer or strengthened?).

The four Church Authorities included in the pilot audits were:

- Archdiocese of Adelaide,
- Sisters of the Good Samaritan,
- Diocese of Sale, and
- Marist Brothers Australia.

This small sample sought to include an adequate cross representation of church activities – two dioceses and two religious institutes, a diverse range of ministries, and urban and rural settings – inclusive of governance for overseas ministries/operations and a mixture of regulated and unregulated activities.

Whilst the pilot audits did not constitute a full audit of all criteria and indicators within the draft Standards, the audit procedures became more detailed with each successive pilot, as CPSL's knowledge and understanding of existing safeguarding practices grew and as feedback was received regarding the application of the Standards within the various settings.

Audit reports for each pilot audit were provided to the relevant Church Authority leadership team for their review and action and will not be made publicly available on the CPSL website.

Audit reports for future audits conducted by CPSL will be made publicly available, once the formal audit program is rolled out in 2019.

3 Audit approach

The pilot audits included an assessment of compliance against the draft Standards as follows:

Standard Description	Approach for Pilot Audit
1 Committed leadership, governance & culture	<i>In scope</i>
2 Children are safe, informed and participate	<i>In scope</i>
3 Partnering with families, carers & communities	<i>In scope</i>
4 Equity is promoted & diversity is respected	<i>In scope</i>
5 Robust human resource management	<i>In scope</i>
6 Effective complaints management	<i>Partially Assessed</i>
7 Ongoing training & education	<i>In scope</i>
8 Safe physical and online environments	<i>In scope</i>
9 Continuous improvement	<i>Not Assessed</i>
10 Policies and procedures support child safety	<i>In scope</i>

Standard 6 regarding effective complaints management was still being finalised by CPSL during the time of the pilot audits and was therefore only partially assessed in one of the entities.

Standard 9 regarding continuous improvement was not assessed, as it was expected that the entities participating in the pilot would, in the majority of cases, need time to implement the full requirements of the Standards before initiating continuous improvement activities.

It should also be noted that as the pilot audits were being conducted, CPSL was undertaking a national consultation about both the content of the Standards and the proposed audit model [read the feedback from the national consultation on the CPSL website <https://www.cpsltd.org.au/safe-church/have-your-say/>].

Therefore, as the pilots proceeded, the content of the Standards was being refined so as to incorporate feedback from the consultations and to build in learnings from each pilot conducted. As such, each pilot entity was assessed against the most current version of the Standards available at the time.

The audit approach for all pilot audits included the following:

- planning meeting: with the Church Authority leadership team;
- interviews: with key safeguarding personnel and ministry/operational personnel;
- risk assessment: review and assessment of the risk management processes in relation to child safeguarding risks;
- assessment of the design of a selection of safeguarding controls;
- testing of the operational effectiveness of a selection of safeguarding controls; and
- workshop to review the audit results and to debrief on the pilot process.

All pilot audits were undertaken by CPSL staff, with three of the pilots being undertaken with the assistance of a contracted service provider (KPMG). As noted above, the pilot audit process evolved as each audit was undertaken and therefore, the extent of audit procedures differed for each of the pilots.

The specific focus for each pilot audit is detailed below.

Archdiocese of Adelaide – May 2018

The pilot audit work at the Archdiocese of Adelaide was conducted in early May 2018, approximately two weeks after the first draft of the Standards (dated April 2018) was published for public comment. Given this pilot was conducted at such an early stage in the NCSS development, it did not include detailed audit procedures, but acted as a benchmarking exercise for CPSL to assess the applicability and practicality of the draft Standards with respect to existing safeguarding practices already operating within a diocesan setting.

This review focused on safeguarding policies and practices applied at the archdiocesan level only (parishes, schools and other services such as Centacare were not in scope for this pilot).

Sisters of the Good Samaritan – July to August 2018

The pilot audit for the Sisters of the Good Samaritan (SGS) focused on:

- review of existing safeguarding practices in place within SGS ministries, for alignment with the draft Standards;
- identification of good practice; and
- assessment of any gaps or requirements for future training and support.

As part of this pilot, the audit team inspected and reviewed records at the SGS office in Glebe and interviewed a sample of Sisters to determine how safeguarding practices are implemented within their various ministries.

NB: activities related to the Good Samaritan Inn and Good Samaritan Education were not in scope for this pilot.

Diocese of Sale – August to September 2018

The pilot audit work at the Diocese of Sale focused on safeguarding policies and practices across the Diocese, including how the central diocesan policies are applied and administered within and throughout the parishes. A sample of five parishes (out of 19 parishes: 25%) were visited and safeguarding practices reviewed for alignment with diocesan policies and with the draft Standards.

NB: Schools and other services within the Diocese of Sale were not in scope for this pilot.

Marist Brothers Australia – September to November 2018

The pilot audit work at Marist Brothers Australia (MBA) assessed a sample of MBA ministries for compliance with the draft Standards and included both “unregulated” activities (i.e. ministries or activities conducted by MBA which are not subject to existing regulation or external assurance processes) and “regulated” activities (those subject to existing regulation or external accreditation).

Specifically, for the regulated activities, CPSL’s approach focused on reviewing the extent of coverage by the external accreditation/assurance processes and not re-auditing safeguarding practices which are already covered by an external provider.

Three areas of MBA were in scope for the pilot:

- safeguarding practices relating to MBA across the religious institute (unregulated activity);
- Marist180 (regulated activity); and
- Australian Marist Solidarity (regulated activity).

The audit team inspected and reviewed records at the Marist Brothers’ offices in Mascot and Drummoyne, the Marist180 office in Blacktown and the Australian Marist Solidarity office in Brisbane.

The audit team also interviewed a sample of Marist Brothers to determine how safeguarding practices are implemented within their various ministries.

4 Overall observations

The results of the CPSL pilot audits indicate that there is a strong commitment to child safeguarding in all four entities reviewed. Whilst audit results varied between the entities, good practices were generally noted in areas such as recruitment, training and controls for the movement of clergy and religious across Australian dioceses and state jurisdictions.

Improvement opportunities varied for each pilot entity, depending on the nature of the ministries being provided, however CPSL did note that all four entities involved in the pilot were at a very early stage of developing strategies for the implementation of Standards 2, 3 and 4. These three standards focus on the voice of the child, the inclusion of the family and community in decision making and the consideration of diversity and equity when implementing safeguarding practices. These three standards will require additional consideration and new processes to be developed by many Church Authorities in order to fully comply with the requirements.

In addition, the pilot audit work and Standards consultation process have indicated that whilst many Church Authorities are aware of the key risks and considerations in overseas ministries over which they have governance, they will need to review these operations in light of applying the Standards to their overseas ministries.

This area will require additional consideration and contextualisation by Church Authorities in order to ensure the principles of the Standards are appropriately applied, taking into account the local legislation, and cultural and social requirements in foreign jurisdictions.

CPSL also noted that whilst initiatives to achieve compliance with the Standards were already underway in the pilot entities, some of the implementation work was being done in an ad hoc way. It is hoped that the Safeguarding Implementation Plan which is prescribed by the Standards will provide a framework for ensuring all elements of the Standards are considered and addressed.

5 Key learnings from pilot audits

Learnings from the pilot audits will be incorporated into the design of the final audit program, which is expected to commence in 2019.

1. *Diverse and complex nature of Catholic entities*

The Catholic Church in Australia is large, complex and diverse, with activities spanning multiple sectors including education, welfare, health, social services and pastoral ministries.

As such, the audit approach for each entity is unique and will need to be tailored based on a range of demographics and characteristics, including the range of services provided, the geographical spread of ministries and locations, the extent of regulation already in place (for example, with respect to schools and welfare services) and the governance arrangements in place (for example, ministries or activities which are governed and/or conducted jointly between two or more Church Authorities).

CPSL approach

CPSL's audit methodology will include a comprehensive planning and scoping phase at the commencement of each audit to ensure that the audit approach is tailored to the unique characteristics and attributes of each entity and that the audit testing and assessment of safeguarding practices is focused on the safeguarding risks specific to the entity.

2. *Pre-audit information gathering*

During the pilot audits the audit teams observed that all of the pilot entities had documented safeguarding policies, which are publicly available and, in some instances, accessible on websites – meaning they can be reviewed remotely thereby shortening the length of time needed for site visits and on-the-ground testing. The pilot audits also demonstrated work done in other areas such as training, human resource management and information sharing.

CPSL approach

CPSL will allocate sufficient time for preparation and review before audits commence to understand the extent of the entity's operations and to review existing available information, such as safeguarding policies, procedures, templates, tools and practices which are already in place and accessible on the entity's website. Additional documents will also be requested from the Church Authority for pre-audit review as required.

CPSL has developed a Self-Assessment Tool which Church Authorities will be required to complete as part of the audit planning process. The Self-Assessment will not only provide preliminary information to CPSL regarding the entity's safeguarding practices but will allow the Church Authority to assess its own level of compliance and to flag any areas which may need to be reviewed or improved.

3. *Extent of existing safeguarding regulation*

Many Catholic entities are subject to existing regulatory oversight, quality assurance processes and/or safeguarding legislation and are already audited or accredited under separate audit programs. Under the CPSL audit framework, church entities which are subject to existing external regulation will not be re-audited and CPSL will instead seek to rely on the audit work of the regulatory body or accrediting agency to avoid duplication.

This will require the Church Authority to have a clear understanding of which of its organisations and services are accredited or audited by an external party and to provide evidence to CPSL of the accreditation or audit process.

CPSL approach

In addition to the Self-Assessment noted in point 2 above, CPSL will request each Church Authority to complete a Declaration of Assurance and Compliance for their activities and ministries which are subject to existing regulation and which are covered by external assurance processes. As this approach is implemented, CPSL will use this information to map the requirements of the Standards against accreditation and external assurance processes in place across the country. Once this mapping is completed, CPSL will implement a robust interoperability model which would mean that only those NCSS requirements that are not covered by external assurance processes would be audited by CPSL, thus reducing duplication and avoiding audit fatigue.

4. *Application of the Standards in overseas jurisdictions*

Church entities with operations in overseas jurisdictions face different challenges when implementing the Standards in those regions. For example, many developing countries do not have a system for conducting child safeguarding background checks (such as Working With Children Checks) and operate in legal and cultural environments which are substantially different from those in Australian contexts.

Interviews with Church personnel in overseas jurisdictions indicated that whilst they were aware of child safeguarding risks and the importance of implementing consistent safeguarding practices, the application of the Standards in their entirety in these jurisdictions would require significant support, assistance and strong collaboration and advocacy with civil authorities locally.

CPSL approach

The Standards require that where the Church Authority's governance includes countries other than Australia, the entity must apply the Standards, taking into account relevant international declarations and local legislation. CPSL acknowledges that the implementation of the Standards in overseas jurisdictions will need to be undertaken quite differently to implementation within Australia, however the intent of this requirement does require a strong focus on promoting the rights and appropriate protection of children irrespective of culture, country and context.

CPSL will provide guidance on how entities may implement the Standards in a staged approach, focusing in the first instance on key priority areas such as risk assessment, recruitment practices, training and complaints handling.

CPSL is also cognisant of the fact that many activities undertaken by Church entities off-shore are conducted in partnership with local overseas agencies or other aid/development agencies. In these cases, the Church Authority will need to demonstrate to CPSL that a coordinated and practical approach is being applied to the implementation of the Standards, which will require demonstrated collaboration, communication and review of safeguarding processes between all parties involved in the overseas activity or ministry.

5. *Appropriate consideration and selection of church activities and ministries for audit*

During the pilot audits, we noted that the successful implementation of safeguarding practices across ministries was influenced by various factors, including the breadth and complexity of the ministry, the availability of competent and trained staff and the remoteness of the location including the support provided from the Church Authority's central office.

CPSL approach

CPSL will ensure that for each audit, a sufficient sample of ministries is included to obtain an appropriate cross section of the Church Authority's activities. This will include review of approximately 25 percent of locations/sites across the Church Authority, with emphasis given to areas of higher risk such as ministries in remote or isolated settings, ministries which include one-to-one contact with children and ministries which work specifically with vulnerable children.

6. *Assessment of Compliance*

During the pilot audits, we noted that the level of compliance with various NCSS indicators was evolving, as Church entities started to review the requirements of the Standards and commence implementation of policies and practices to address the indicators.

CPSL approach

CPSL will assess the entity against each indicator of the Standards, using a four-point scale, which ranges from situations where the entity has not addressed the required indicator or is unable to demonstrate compliance, to situations where the indicator requirements are formally embedded, integrated and coordinated, including across remote operations and activities.

The four-point scale will allow the entity to better understand its level of compliance with the various indicators and to prioritise areas where practices are not operating effectively or have not yet been addressed. The proposed compliance scale is attached at Appendix 1 for information.

7. *Debrief of audit conclusions and recommendations for improvement*

CPSL notes that whilst the identification of gaps or improvements in safeguarding practices is the primary focus of the audit, a key success factor in the remediation of issues is the provision of recommendations to the Church Authority, including guidance on actions to be taken based on the priority and risk exposure of the issues noted.

CPSL approach

CPSL will hold a debrief meeting at the conclusion of fieldwork for every audit, in the format of a "solutions workshop", whereby audit observations, recommendations and actions for remediation will be discussed and agreed with the Church Authority leadership team and relevant stakeholders.

Audit findings will be given a priority rating, assisting the Church Authority to implement the actions in a staged approach and to allow the Church Authority to build capacity and provide education and training to personnel in the process.

Church Authorities will be required to attest to CPSL that the remediation actions have been implemented within an agreed timeframe.

6 Learnings and feedback of the pilot participants

CPSL asked each of the Church Authorities who participated in the pilot audits to share their reflections on the audit experience, to assist CPSL and other entities to understand the process from the perspective of an entity being audited.

Their reflections are provided in full on the following pages.

CPSL wishes to thank all of the pilot entities for participating in the pilot audit program, the results of which have provided rich information and knowledge to further inform the audit process as well as provide input into the refinement of the Standards and the development of guidance tools and materials.



Catholic Diocese of Sale

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13th December 2018

Sheree Limbrick
Chief Executive Officer
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Dear Sheree,

Grace and Peace, I hope this letter finds you well.

The Diocese of Sale, Victoria was happy to participate in the Pilot Audit testing by Catholic Professional Standards Limited (CPSL).

The nature of the Diocese is that it has changed over the last 30 years from being a rural Diocese to being something of a hybrid, where the largest numbers of Catholics are concentrated in the Western, or Melbourne end.

The Diocese is thus characterised by great diversity. We have the fastest growing part of Australia in some of our new suburbs with many migrants from India, Sri Lanka, The Philippines, Mauritius, Tonga and Samoa making up our congregations, as well as a scattering of long-term locals. In the centre of the Diocese we have the lowest socio-economic part of Victoria, and to the East all the way to the NSW border we have few people.

As every entity in the Catholic Church in Australia has, we have also been undergoing a cultural change, which began well before the Royal Commission into Institutional Sexual Abuse. It is another aspect of change within our Diocese with which people have had to cope and adapt. It is a slow and at times laborious process.

Yet it is a journey that many of our Parishes, and agencies are willing to make. It is one thing to ask our People and Parishes and Schools and other agencies to comply with new regulations, it is always helpful if in fact you can assist in that compliance by assisting them to do so.

To this end we have employed, as many have, a Professional Standards Officer and established a Diocesan Professional Standards Team, and have sought to establish in each Parish and entity a local structure where vigilance and oversight might be maintained.

In embarking upon new venture such as this, we did not really know what we did not know about how this might be implemented. So the chance to take up the CPSL offer of an audit was most welcome. As a Diocese with few resources any assistance in moving toward this area of compliance and the cultural change surrounding it was welcome.

The participating entities all found the staff from CPSL helpful, encouraging and purposeful. There was never a sense of 'being checked up on', but rather of working with and understanding deeper the standards and their requirements. It was also an opportunity for CPSL to adjust their prepared models to the reality in which they found themselves. So there was an atmosphere of shared learning, not shared ignorance.

We had four of our Parishes audited. These were of differing sizes and located in different geographic locations. Again the process was courteous, and not threatening to parish staff, most of whom are still struggling to understand what is required and to have the means available to respond accordingly.

In each of the Parishes areas of non-compliance were uncovered. This ranged from not having adequate documentation, through to inadequate record keeping, and lack of training within the Parishes.

Each Parish was also surprised at the level of compliance that they had already achieved. They were delighted by how far this change of consciousness had penetrated into the 'normal way of doing things.'

Similar experience was reported by the Diocesan Office, the Catholic Education Office and Schools and CatholicCare.

At the end of the process we were pleased to receive a feedback session, where results had been tabulated, and area of improvement provided. This was done in a respectful and encouraging way with all present recognising how far we had come and just how far we still need to go.

The tools that were used by the 'assessors' were, I understand, still being fully developed and thus feedback from the test audit sites was able to be taken into account from real-life experience.

Speaking with some people involved in our Parishes, some said the prospect of the audit was daunting before it happened, but came to see it as a genuine attempt to assist in the creation of safe Parish environments for all. Questions were encouraged; explanations sought and given as to why things ought be this way and not another way; and suggestions of how to improve the process absorbed. The Parishes felt that not enough time was given to preparing them properly for this, and as the process was a one off and unfamiliar, perhaps more time needed to be dedicated to each session to achieve a more fruitful result.

Having a report where each Parish or entity could then take up the areas where things were not compliant was helpful. Parishes and other entities were pleased that this would not become simply a once-off experience where things could be tidied up when the 'assessors' were coming but saw it as an assistance to work with the goodwill that was present and seek to overcome the remaining pockets of resistance.

With thanks for the opportunity to comment,



+Patrick O'Regan
Bishop of Sale



Feedback from the Sisters of the Good Samaritan following participation in the Pilot Audit by Catholic Professional Standards Limited (CPSL)

26 November 2018

The Sisters of the Good Samaritan offered to engage in the Pilot Audit in recognition that we needed to learn more and introduce further policies and procedures in order to be fully compliant with the new Standards. We did not see this as an end in itself, but as a means of ensuring that optimum safeguarding measures were in place for children and vulnerable adults within Good Samaritan life and mission.

In the first instance we wish to commend the professionalism in which the whole process was conducted. Tania Steggeman and her team created an atmosphere of respect and trust which enabled all to share their experience with candour and honesty. Not only was the Audit Team interested in written policies, they astutely explored what was happening at the “coal face” in actual practice.

Learnings

The Audit reinforced our understanding of the seriousness with which the Congregation needs to engage in the area of Professional Standards. We learnt that written policies are important, but do not offer an automatic safeguarding guarantee. We were reminded that ongoing vigilance and comprehensive and continuing improvement is required in regard to cultural change, leadership, training, record keeping etc. – actually in every aspect of Good Samaritan life, mission and administration. Many felt that they came to a greater understanding of and appreciation for the scope of the Standards.

We were reminded that responsibility for meeting the Standards is carried by everyone – leadership, staff, companies, committees, each Good Samaritan Sister and colleague. With responsibility comes a commitment to allocating sufficient resources to ensure a comprehensive safeguarding regime.

The pivotal importance of risk assessment and risk mitigation was highlighted for us and we appreciated being informed of the gaps in our policies in this regard. We became even more keenly aware of issues of policy and practice re safeguarding of children in our kinder schools in the Philippines and Kiribati and how we support, encourage and resource our Sisters in a culturally appropriate manner.

Area of Concern

The Standards have been developed in an Australian context and reflect Australian language and legal framework. We note that “all activities and ministries under the jurisdiction of a Church Authority are covered by these Standards including where a Church Authority has canonical responsibility for locations outside of Australia”. We question whether the Standards sufficiently acknowledge the differing cultural and legal frameworks in countries beyond Australia and the challenges this poses in the implementation of the Standards. We live and minister also in Kiribati, Philippines and Japan. In a country like Kiribati, for example, there are few, if any, systems or processes in place for the reporting of any type of abuse. There are real challenges for us in regard to the supervision of child safe practices in these countries, how we ensure appropriate training and induction with the Standards, and how we provide professional supervision for our Sisters. We are also aware of the challenges within Australia to monitor online activity given the existence of fire walls, censorship etc. In our overseas ministries we are not aware of any mechanism or censorship so compliance will be even more difficult.

Possible improvement

Some Sisters commented that they felt it would have been more helpful if some members of the Audit Team were more familiar with the Catholic Church and religious life in general. Another suggestion was that a process of self-appraisal could assist leadership in collaboration with the relevant safeguarding personal to map the current practice and to identify areas for remediation. This would then be validated by the Auditing Team through a formal Audit.

The Good Samaritan Sisters commend the work of CPSL and their conduct of the Pilot Audit. We offer our ongoing commitment to collaborate with CPSL in implementing the Standards and engaging in continual improvement in the area of Professional Standards.



Patty Fawkner SGS
Congregational Leader



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8 February 2019

By email: sheree@cpsltd.org.au

Ms Sheree Limbrick
CEO
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Dear Sheree

I write to provide you with a response to our involvement in the recent CPSL trial audit process.

As you know, since most Marist ministries are in the heavily regulated school sector, CPSL selected three non-school areas to audit. We had the pleasure of working with CPSL and the KPMG team over the period of about a month whilst they conducted the pilot audit, both onsite at our various offices, and through remote interviews.

Marist180

Formerly known as Marist Youth Care, Marist180 is an incorporated entity, operating under its own Constitution and Board of Directors. Marist180 assists at-risk children and young people. It provides out of home residential care, therapeutic support, educational opportunities and employment assistance, and other allied services.

While Marist180 works in a strongly regulated area, the Audit provided us with the opportunity to review our contracts with regard to their child safety provisions and ensure key staff are aware of expectations and requirements.

AMS – Australian Marist Solidarity

Australian Marist Solidarity is the overseas development arm of Marist mission. It raises funds and manages projects mostly in the Pacific and Asia. It is also an incorporated entity with its own Constitution and Board of Directors.

ACFID is the regulatory body that oversees agencies such as AMS and it has its own stringent expectations. A significant part of the Audit was mapping the ACFID code of conduct against the National Catholic Safeguarding Standards. Sixteen indicators were not applicable to AMS and 14 indicators were seen to be overlapping with ACFID (pending the release of Standard 6 this may increase). These weren't addressed by the CPSL audit.

Marist Brothers Province

CPSL also chose to audit the Province. At the time of the audit there were 200 Brothers ranging in age from 33 to 95. Eighteen of these were involved in ministries out of Australia – some in Asia, some in Europe and one in Africa. The average age of the Brothers in the Province is 75 and many are not involved in active ministry. Those

who are, generally work in schools, which are already heavily regulated and are therefore bound by legislative requirements.

The Audit team carried out interviews with Brothers, met with our Professional Standards Office Staff, reviewed documentation and discussed issues with members of the Province Leadership Team.

GENERAL COMMENTS

The Audit process was informed, but casual, making it easy and comfortable for the teams (Marist180, AMS and the Province) to engage with CPSL/KPMG. While it was a challenge for the audit staff to understand the nuances of the different Marist agencies, they were respectful of our structures, pleasant to work with and helpful in their responses and feedback.

There were four valuable benefits of the Audit process. The various teams:

1. developed a knowledge and understanding of CPSL and the Standards;
2. experienced an audit, learning the process and meeting the personnel involved;
3. identified areas in their operations where current policies, processes and protocols need to be refined or revised to comply more fully with the Standards. The Audit report provided helpful advice on the changes that need to be made and will help guide our work; and
4. were affirmed in their efforts to provide truly child-friendly and child-safe environments.

One area identified as requiring further development is that of international arrangements. Currently there appears to be limited contextualisation for those activities which are international. For example, when AMS provides funding to build a toilet block in a school in Kiribati that is not part of the Province of Australia, it is unrealistic to expect that AMS, as a funder, can implement a minimum of 7 standards with 47 indicators (pink category), up to a maximum of 10 standards and 110 indicators (black category) at the school. Having to do this across 50 different project sites would be crippling. As indicated by CPSL, the possibility for progressive implementation based on the criticality of each indicator will be important to consider to prevent overloading AMS' resources.

The Marists are grateful for the opportunity to be part of the trial Audit and have gained valuable insights into the CPSL Standards and Audit processes.

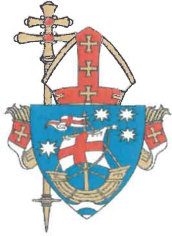
I would particularly like to acknowledge the work of Tania Stegemann who coordinated our involvement and was responsive to all of our queries.

With gratitude and good wishes

Yours sincerely



Br Peter Carroll FMS
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Catholic Archdiocese of Adelaide

February 22, 2019
19/128

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Dear Sheree

Thank you for the opportunity to provide feedback regarding our engagement with Catholic Professional Standards in May 2018.

We welcomed the invitation to part of the early developmental stage of the National Catholic Safeguarding Standards and saw this as a learning experience to gain an insight as to how our child safe initiatives align with the proposed standards. Similar to many other Diocese, the Archdiocese of Adelaide has been invested in establishing and improving child protection policies, practices and culture for some time. The Archdiocese has a Child Protection Unit which has been in operation since 2004. The unit not only develops policy but provides direct support, consultation to parishes, education with clergy, religious and parish communities, and creates resources for parish personnel, families and children.

As you are aware we have developed a program called Safe Environment For All (SEFA) which establishes the Archdiocese of Adelaide framework for child protection. This program has five key goal areas and subsequent requirements to guide what the Archdiocese as an organisation and individual parishes must do to create safety for children and young people. This includes standards specific to policies, procedures and practices relating to the empowerment of children and young people, training and development, responding to child abuse, organisational structures and complaint management.

The Adelaide Archdiocese was chosen to take part in the pilot audit program but was not audited in full, rather a series of discussions with CPSL was had regarding Archdiocesan policies and practices and the Archdiocesan SEFA program. Over the course of two days members of the audit team met with differing departments in the Archdiocese, inclusive of the Child Protection Unit, members of the Child Safe Contact Person network, Human Resources, Professional Standards and Church leadership. During this time CPSL were able

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to test compliance and determine if the standards are measurable in practice. The CPSL team considered how Archdiocesan processes already met the draft National Standards, and gave feedback regarding areas in need of further improvement. The CPSL team also heard from parish representatives about the internal audit the Archdiocese has completed with all parishes against the five SEFA goals and requirements.

Being part of the early consultation and action research process not only allowed us the chance under the guidance of the CPSL team to identify our strengths and challenges in complying with the safeguarding standards but also encouraged a process of due diligence in preparation for an independent audit.

The feedback given by CPSL indicated that the Archdiocese of Adelaide had begun to demonstrate aspects of meeting the National Catholic Safeguarding Standards, with an established culture of promoting child safety and children's rights. Encouragingly, it was found that there was significant crossover between the Archdiocesan SEFA program and the draft CPSL standards and for children and young people. It is envisaged that the SEFA program will formulate much of our evidence of compliance placing the Archdiocese in a position to be able to respond to an audit process more readily. Given this, we suggest some consideration may be given to being accredited on areas where standards are demonstratively met and participate in an amended audit which focuses and or prioritises areas of specific risk as identified by the Royal Commission.

Feedback regarding the need for a more diverse organisational training program which greater encompassed areas of the standards was helpful, and we have begun to incorporate this thinking into the Child Protection Unit's training material.

Over the course of the two days questions were raised regarding how the CPSL audit would be implemented in smaller parishes and communities, particularly rural parishes, where there are very few or no children, and parishioner numbers are declining. Some of these parishes lack both financial and human resources and it was discussed that despite the Archdiocese having comprehensive policies and procedures in place, such communities may struggle to attain the CPSL standards in practice. Some of the success of the work of the Child Protection Unit can be attributed to the resource allocation to employing qualified social workers and psychologists who have significant experience in the child protections sector to drive the strategic direction and the relational, visible approach to creating a culture which prioritises the safety of children and young people. The CPSL team listened and considered this feedback and we look forward to see how this difficulty is approached when the audits commence.

Overall, those involved in the pilot audit visit felt it was a positive experience with learning opportunities for both us within the Archdiocese, and for the CPSL team in gaining a better understanding of how such an audit process may work and be received in the diverse

communities of the wider Catholic Church in Australia. We also appreciated ongoing communication with the CPSL team in the time following the audit, with the Child Protection Unit being given opportunity to give feedback on the draft CPSL Child Friendly Standards, and to participate in a further meeting regarding the upcoming audit process. In all interactions, the CPSL team have been respectful and friendly, allowing us to feel that we are collaboratively working toward a joint goal of keeping children and young people safe, both within our own Archdiocese, and in the Church as a whole.

Yours sincerely,

A handwritten signature in blue ink that reads "Philip Marshall." The signature is written in a cursive, flowing style.

Fr Philip Marshall
Administrator Delegate

Compliance Assessment Scale



Compliance with each indicator will be assessed using a four point scale, as follows:

	General	Processes	People/Resources
Not Addressed	<ul style="list-style-type: none"> The entity has not addressed the required indicator or is unable to demonstrate that the requirements of the indicator are in place and/or are operating effectively and continuously. 	<ul style="list-style-type: none"> Processes are non-existent. Processes exist however the specific requirements of the indicator have not been addressed. 	<ul style="list-style-type: none"> No resources have been assigned.
Initial/Ad-Hoc	<ul style="list-style-type: none"> The entity has commenced to address the indicator, however processes are ad-hoc or are applied on a case-by-case basis. 	<p>Some relevant processes have been implemented which align with the requirements of the indicator, however they are:</p> <ul style="list-style-type: none"> siloes; undocumented; inconsistent; lack clarity. 	<ul style="list-style-type: none"> Capabilities vary across the entity. Resources are not formally assigned.
Defined and Developed	<ul style="list-style-type: none"> The entity has addressed the indicator and is in the process of implementing the requirements. 	<ul style="list-style-type: none"> Relevant processes have been defined and developed, however are yet to be rolled out across the full operations of the entity. 	<ul style="list-style-type: none"> Resources have been assigned and responsibilities defined, however there is no formal training or communication of standard procedures and it is unlikely that deviations will be detected.
Managed and Measurable	<ul style="list-style-type: none"> The entity has demonstrated that indicator requirements are formally embedded and are operating effectively and continuously. 	<ul style="list-style-type: none"> Relevant processes are integrated and coordinated and extend to remote operations and activities. 	<ul style="list-style-type: none"> Personnel have been trained to detect and report on deviations or break down in processes. Resources have been assigned to monitor and address non-compliance.