National Catholic Safeguarding Standards

Diocese of Ballarat

CPSL
CATHOLIC PROFESSIONAL STANDARDS

Audit Report

September 2019

Catholic Professional Standards Ltd acknowledges the lifelong trauma of abuse victims, survivors and their families, the failure of the Catholic Church to protect, believe and respond justly to children and vulnerable adults, and the consequent breaches of community trust.

Catholic Professional Standards Ltd is committed to fostering a culture of safety and care for children and vulnerable adults.

This report is available on the Church Reports page of the CPSL website

Catholic Professional Standards Ltd
Level 13, 200 Queen Street
Melbourne Victoria 3000

Phone: 1300 603 411
Email: info@cpsltd.org.au
www.cpsltd.org.au

Table of Contents

1. Executive Summary

1.1 Context

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 has developed the National Catholic Safeguarding Standards (NCSS), to provide the framework for Catholic Church entities to build safe cultures and environments and to ensure that safeguarding practices are consistently applied across the Australian Catholic Church.

The first edition of the NCSS was formally released on 30 May 2019 and applies to all Catholic ministries, including Catholic dioceses; religious institutes; institutions providing education, health and aged care, social and community services, pastoral care and other services. CPSL has also established a risk-based audit program to assess compliance with the NCSS. This audit report includes the results of the NCSS compliance assessment for the Catholic Diocese of Ballarat (Diocese).

1.2 Background

The Catholic Diocese of Ballarat is geographically extensive, comprising 40 parishes which cover the western third of Victoria, extending from the Murray River in the North (Parish of Mildura) to the Southern Ocean in the South (Parish of Warrnambool) and through to the western border of Victoria (Parish of Nhill). The Diocese has 49 active and retired clergy, with three seminarians currently studying at Corpus Christi College in Melbourne. There are 38 diocesan and parish paid staff and approximately 1,600 volunteers, undertaking a variety of ministries, including Children's Liturgy, Children's Sacramental Programs and Youth Groups.

The Diocese has 11 Catholic Secondary Colleges and 53 Catholic Primary Schools which educate nearly 18,500 students in the Diocese, under the management of Catholic Education Ballarat. Centacare Ballarat is the main social welfare organisation of the Diocese and has offices in Ballarat, Daylesford, Hamilton, Horsham, Maryborough, Mildura, Swan Hill and Warrnambool. Its services cover the areas of employment, housing, disability services, counselling and family services, mental health services, victims' assistance programs, homelessness support and community and advocacy support. Note that the activities of Catholic Education Ballarat and Centacare Ballarat were out of scope for this audit (refer section 1.3 Audit Approach).

The current Bishop of Ballarat, Paul Bird CSsR, was installed on 16 October 2012.

The Catholic Diocese of Ballarat has been assessed as a "Category One" church entity for application of the NCSS (Working with Children). There are 10 NCSS Standards, 49 NCSS Criteria and 111 NCSS Indicators that apply to Category One. For further details of the category system and the Indicators which are applicable, refer to the NCSS documentation available on the Audit Framework page of the CPSL website.

Our assessment of the Diocese's compliance with the Category One Indicators is detailed in Section 2 of this report. Our recommendations for improvement, including the Diocese's management responses are included in Section 3 of this report.

The full audit report will also be publicly available on the Church Reports page of the CPSL website.

1.3 Victorian Legislative Context

The Diocese is subject to the Victorian Child Safe Standards, which came into effect progressively from 1 January 2016. The Victorian Child Safe Standards are compulsory for all organisations providing services to children and were introduced as part of the Victorian Government's response to the Family and Community Development Committee of the Victorian Parliament's *Betrayal of Trust: Inquiry into the Handling of Child Abuse by Religious and Other Non-Government Organisations (Betrayal of Trust Inquiry).*

Whilst this audit focuses on compliance with the NCSS, the requirements of the Victorian Child Safe Standards have been mapped by CPSL to the NCSS to ensure key requirements are aligned. For further details, refer to the legislative mapping documentation available on the Audit Framework page of the CPSL website.

1.4 Audit Approach

The NCSS seek to build a culture of shared responsibility for safeguarding and to ensure that policies, practices and codes of behaviour work in unison to prevent, detect and appropriately respond to potential or actual incidents of child abuse.

In this context, the audit processes we have undertaken are intended to provide reasonable assurance that safeguarding controls have been appropriately designed and are operating effectively. Accordingly, this report provides a point-in-time assessment of the safeguarding practices implemented by the Catholic Diocese of Ballarat and the extent of compliance with the requirements of the NCSS.

The focus of this audit was on ministries or activities conducted in parishes and the parish volunteer network, which are not subject to external assurance processes. Our testing procedures included the following:

- interviews, observations and enquiry with diocesan and parish leadership, clergy and relevant personnel;
- documentation and policy review;
- assessment of the design of safeguarding controls implemented by the Diocese; and
- testing of the operation of safeguarding controls implemented by the Diocese.

Audit activities were conducted at the diocesan office in Ballarat and the audit team also visited and assessed the safeguarding practices at 11 parishes (25%) chosen randomly across the Diocese (see Appendix B for a list of parishes visited).

As part of this audit, we also met with key personnel at Centacare Ballarat as well as the Catholic Education Office Ballarat. The activities of these entities, including their child safety practices, are subject to existing regulatory requirements and external accreditations – under the CPSL audit framework, these entities are not re-audited by CPSL, although both entities were required to provide declarations to CPSL regarding the extent of regulation and audit processes that are in place.

As such, the findings, recommendations and management actions in this report pertain solely to the diocesan ministries or activities which are not subject to assurance processes, and should not be construed as applying in any way to the activities of Catholic Education Office Ballarat or Centacare Ballarat.

1.5   Overall Audit Findings

Compliance with the NCSS Indicators has been assessed using a four-point maturity scale.[1]

Our assessment indicates that the Diocese had fully implemented or was substantially progressed in the implementation of 75 (73%) of the 103[2] Indicators which are relevant to their operations.

Twenty-six Indicators (25%) are in the initial stages of being addressed, and a further two Indicators yet to be addressed – these pertain to the implementation of cultural safety training and monitoring of internet usage/web browsing by personnel (see further comments below).

Many of the areas of improvement identified from this audit could be addressed by a more centralised approach at the Diocese level, aimed at providing greater support to parishes and increasing consistency of practices across the Diocese.

The key findings from the audit are summarised below.

NCSS Standard 1 – Committed Leadership, Governance and Culture

The Diocese has a strong, public commitment to the safeguarding of children and has a dedicated Coordinator for Professional Standards as well as a Professional Standards Consultative Panel and Bishop's Advisory Council at the diocesan level, to implement and monitor the requirements of the NCSS.

All parishes reviewed as part of this audit were fully aware of the importance of safeguarding and had either appointed or were in the process of appointing a dedicated Parish Safeguarding Officer.

Templates have been provided by the Diocese to assist parishes with assessing key safeguarding risks within their ministries - whilst all parishes reviewed during this audit were aware of key safeguarding risks and had mitigation strategies in place, not all of the parishes had adequately documented this assessment. In addition, safeguarding risks identified in the parishes are not notified to the diocesan office, resulting in a lack of visibility at the Diocese level over potential key risks.

NCSS Standard 2 – Children are safe, informed and participate

NCSS Standard 3 – Partnering with families, carers and communities

NCSS Standard 4 – Equity is promoted and diversity is respected

Our testing procedures indicated that strategies are in place to engage with families on safeguarding matters, including providing information on safeguarding in the parish bulletins, specific sermons/discussions on safeguarding during Mass, promotion of safeguarding and participation in Child Protection Week and proactive dissemination of safeguarding information and materials by the parish office and/or Parish Safeguarding Officer.

The Diocese is yet to implement strategies for engagement with children and is developing materials and ideas to seek children's views, consult children about what makes them feel safe and implement changes as required to existing safeguarding practices. This will include development of child-friendly materials to inform children about their rights, as well as age-appropriate ways for children to raise concerns or complaints. The Diocese has plans to leverage child-friendly materials and processes from Catholic Education Ballarat (as appropriate) for extension to parish activities.

NCSS Standard 5 – Robust Human Resource Management

Formal systems are in place for management of Working with Children Checks, at both the parish level for checks relating to volunteers and Diocese level for checks relating to clergy - the latter includes strong controls to check credentialing for visiting clergy who request to minister in the Diocese.

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[1] Refer Appendix A for definitions of the maturity scale used for the Compliance Assessment.

[2] Of the 111 NCSS Indicators applicable to Category One, 8 of these are not relevant to the Catholic Diocese of Ballarat's operations.

We also noted strong practices in relation to selection of candidates for seminary programs, including ongoing review of progress as well as mentoring and support services for newly ordained priests. These same practices extend to selection of overseas priests, including the associated training, induction and mentoring for overseas priests prior to commencing work in the Diocese.

Whilst the Diocese assesses safeguarding requirements for all new employment appointments, particularly those roles working with children, this process is not formally documented or evidenced in recruitment documentation.

We also identified significantly varied volunteer recruitment practices across the parishes and recruitment processes for volunteers need to be confirmed and formally documented.

The implementation of professional/pastoral supervision and formal performance reviews for clergy are new requirements under the NCSS and the Diocese is still developing procedures in these areas.

NCSS Standard 6 – Effective Complaints Management

The Diocese was the subject of one of the individual case studies during the Royal Commission and has had a history of known offenders, including past failings in responding to and reporting of complaints. The CPSL audit does not re-assess the outcomes of individual complaints, but focuses on reviewing current complaint management practices, including policies and procedures in place to prevent, detect, report and respond to all incidents and complaints, including the associated training, awareness and education for all personnel.

Our audit procedures have indicated that the Diocese has conducted significant work to establish clear and structured procedures for complaints handling, including a strong pastoral approach in the handling of active complaints and formal risk management practices to address potential incidents or concerns.

NCSS Standard 7 – Ongoing education and training

Whilst personnel interviewed demonstrated a strong understanding of the need for child safeguarding, articulated an understanding of the signs of abuse and demonstrated knowledge of appropriate responses should a concern be raised with them, the Diocese does not have a formal training program which is applied across the whole of the Diocese and attendance at training is not monitored or followed up at the Diocese level.

Training is conducted by parishes on an ad-hoc or case by case basis, with parishes responsible for ensuring their key personnel, including safeguarding officers, attend the required training.

Training on cultural safety (i.e. creating culturally safe environments for all children) has not yet been addressed.

NCSS Standard 8 – Safe physical and online requirements

The due diligence conducted on third parties using parish facilities varies between parishes. Whilst a standard facilities agreement has been developed, this is not consistently used by parishes and does not contain the required safeguarding requirements.

Information technology devices within the diocesan office, including those parish devices networked with the diocesan office, have appropriate web filtering systems in place. However, active monitoring of internet usage and web browsing by personnel has not yet been addressed.

NCSS Standard 9 – Continuous Improvement
NCSS Standard 10 – Policies and Procedures support child safety

The Diocese will be initiating a Safeguarding Implementation Plan based on the results of the CPSL audit, which will include updating relevant policies and procedures as required.

A formal self-audit program for parishes is also under development.

The following table shows the overall compliance assessment for each Standard.

National Catholic Safeguarding Standard	# NCSS Indicators (Category One)	Not Relevant to Diocese of Ballarat (NR)	Assessment of Compliance			
			Managed & measurable (M)	Defined & developed (D)	Initial / Ad hoc (I)	Not addressed (N)
1: Committed Leadership, Governance & Culture	16	2	7	5	2	-
2: Children are safe, informed and participate	5	-	-	-	5	-
3: Partnering with families, carers and communities	6	-	5	1	-	-
4: Equity is promoted and diversity is respected	4	-	3	-	1	-
5: Robust Human Resource Management	23	4	7	7	5	-
6: Effective Complaints Management	24	-	17	7	-	-
7: Ongoing Training & Education	9	-	-	1	7	1
8: Safe Physical and Online Environments	10	-	1	6	2	1
9: Continuous Improvement	8	2	3	-	3	-
10: Policies and Procedures Support Child Safety	6	-	1	4	1	-
TOTAL	111	8	**44**	**31**	**26**	**2**
			75 (73%)		**28** (27%)	

Audit recommendations are classified according to priority and urgency for remediation.[3]

There are no Priority 1 (high rated) audit recommendations for the Catholic Diocese of Ballarat.

There are nine Priority 2 (medium rated) recommendations and seven Priority 3 (low rated) recommendations, which are detailed in Section 3 of this report. Each recommendation also contains the Diocese's response to the audit finding, including management actions.

We would like to thank the diocesan leadership team and personnel involved in the audit from the Catholic Diocese of Ballarat for their cooperation and assistance with this audit.

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[3] Refer Appendix B for definitions of the Priority rankings used for Recommendations.

2. Assessment of Compliance with NCSS Indicators

Standard 1	Committed Leadership, governance and culture			
Child safeguarding is embedded in the entity's leadership, governance and culture				

Criterion 1.1 - The entity publicly commits to child safeguarding and takes a zero-tolerance approach to child abuse	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.1.1	The entity has a Child Safeguarding Policy that is approved and endorsed by the Church Authority and/or relevant leadership body and is publicly available	✓			
1.1.2	The entity publishes a Child Safeguarding Commitment Statement which is openly displayed and publicly available		✓		

Observations:

1.1.2   The Child Safeguarding Commitment Statement is publicly available on the diocesan website however was not openly displayed and/or available on the parish websites for four of the eleven parishes reviewed. In addition, the existing Safeguarding Policy documents could benefit from review and streamlining. Refer recommendation #1.

Criterion 1.2 - A child safeguarding culture is championed and modelled at all levels of the entity from the top down and bottom up	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.2.1	The Church Authority and leaders of the entity create and maintain an entity's culture of safeguarding by: • Promoting child safeguarding regularly • Emphasising that child-safeguarding is everyone's responsibility • Actively monitoring safeguarding compliance and risk management	✓			
1.2.2	The entity appoints a Safeguarding Committee at the highest level of leadership to oversee the effective ongoing implementation of child safeguarding practices, including the Child Safeguarding Policy and related procedures and practices	✓			
1.2.3	The entity appoints and promotes the role of Safeguarding Coordinator(s), with clearly defined responsibilities for safeguarding children at diocesan, religious institute or ministerial PJP level	✓			
1.2.4	Personnel understand that child safeguarding is everyone's responsibility and are empowered to provide input on child safeguarding practices	✓			

Observations:

Requirements of the Indicators are in place. No recommendations for improvement noted.

Criterion 1.3 - Governance arrangements facilitate implementation of a Child Safeguarding Policy across the entity's activities	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.3.1	Governance arrangements are transparent and include safeguarding roles and responsibilities to ensure accountability for safeguarding is clear	✓			
1.3.2	Where the Church Authority's governance includes countries other than Australia, the entity must apply these Standards taking into account relevant international declarations and local legislation	Not relevant to current operations			

Observations:

Requirements of the Indicators are in place. No recommendations for improvement noted.

Criterion 1.4 - A Code of Conduct provides guidelines for personnel on expected behavioural standards and responsibilities		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.4.1	The Code of Conduct explicitly and equally applies to all personnel and provides guidance on appropriate and expected standards of behaviour of personnel towards children		✓		
1.4.2	The Code of Conduct is written in accessible language and communicated to personnel, children, families and carers		✓		
1.4.3	The Code of Conduct takes into account the needs of all children, paying particular attention to Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds and children with particular vulnerabilities, for example, children who can't live at home.	✓			

Observations:

1.4.1/1.4.2 The method of communicating the Code of Conduct varies significantly across parishes. In addition, the Code is required to be signed by volunteers in only four parishes out of eleven reviewed and there is currently no requirement for clergy to sign the Code. In addition, the Code of Conduct documents could benefit from review and streamlining. Refer recommendation #2.

Criterion 1.5 - The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.5.1	The entity has a clearly documented child safeguarding risk management plan, as part of its overall risk management strategy, which considers actual and potential risks relating to children		✓		
1.5.2	The entity has appropriate risk management processes in place to assess, evaluate, review and oversee the safeguarding of children participating in, or receiving, ministries offshore including cultural immersions, pilgrimages, solidarity campaigns and world youth days	Not relevant to current operations			
1.5.3	Leaders of the entity manage safeguarding risks effectively, through regular identification, monitoring, reporting and review of risks		✓		

Observations:

The Diocese has an overall risk management plan which includes high level safeguarding risks. Whilst parishes are aware of their key safeguarding risks, not all parishes have formally documented these using the standard risk assessment templates. Refer recommendation #3.

Criterion 1.6 - Personnel understand their obligations on information sharing and record keeping		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.6.1	The entity has clearly documented information sharing and record keeping policies and procedures which are communicated to personnel			✓	
1.6.2	The entity's information sharing and record keeping policies and procedures relating to all aspects of child safeguarding, including incidents and complaints, apply sound record keeping principles			✓	

Observations:

The Diocese has a record keeping policy however it does not refer to safeguarding matters. Refer recommendation #4.

Standard 2	Children are safe, informed and participate				
Children are informed about their rights, participate in decisions affecting them and are taken seriously					

Criterion 2.1 - Children are informed about their rights, including safety, information and participation		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
2.1.1	The entity has age-appropriate strategies to proactively: engage with children; seek children's views; consult children about decisions that affect them; and consult children about what makes them feel safe and how this can be recognised and implemented by the entity			✓	
2.1.2	The entity ensures children are made aware of their rights, including their right to be safe from abuse, and are informed whom to contact if they have concerns about their safety or the safety of their peers			✓	

Observations:

The Diocese has only recently commenced developing strategies for these areas. Refer recommendation #5.

Criterion 2.2 - The importance of friendships is recognised and support from peers is encouraged, helping children feel safe and less isolated		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
2.2.1	The entity provides children with age-appropriate information about safe and respectful peer relationships, including through social media			✓	

Observations:

The Diocese has only recently commenced developing strategies for these areas. Refer recommendation #5.

Criterion 2.3 - Where relevant to the setting and context, children and families may be offered access to abuse prevention programs and related information that is age-appropriate		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
2.3.1	Where relevant, the entity provides children and families with information, access and/or referral to abuse prevention programs, appropriate to the child's age, development, ability and level of understanding			✓	

Observations:

The Diocese has only recently commenced developing strategies for these areas. Refer recommendation #5.

Criterion 2.4 - Personnel are attuned to signs of harm and facilitate child-friendly ways for children to express their views, participate in decision-making and raise their concerns		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
2.4.1	Personnel have the knowledge, skills and awareness to identify potential signs of harm and actively support children to raise any concerns			✓	

Observations:

The Diocese has only recently commenced developing strategies for these areas. Refer recommendation #5.

Standard 3	Partnering with families, carers and communities				
Families, carers and communities are informed and involved in promoting child safeguarding					
Criterion 3.1 - Families and carers participate in decisions affecting their child		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.1.1	The entity supports and encourages families/carers to take an active role in monitoring children's safety when participating in activities	✓			
Observations:					
Requirements of the Indicator are in place. No recommendations for improvement noted.					
Criterion 3.2 - The entity engages and openly communicates with families, carers and communities about its child safeguarding approach, and relevant information is accessible		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.2.1	The entity promotes open dialogue and provides a range of ways for families, carers and communities to contribute to discussions about its child safeguarding approach	✓			
3.2.2	The entity provides families, carers and communities with relevant safeguarding information including contact details of the Safeguarding Committee and/or Safeguarding Co-ordinator(s)	✓			
Observations:					
Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 3.3 - Families, carers and communities have a say in the entity's policies and practices		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.3.1	Processes are in place to engage families, carers and communities about their views on policies and practices for keeping children safe		✓		
Observations:					
The Diocese has only recently commenced developing strategies for obtaining feedback from families, carers and communities. Refer recommendation #5.					
Criterion 3.4 - Families, carers and communities are informed about the entity's operations and governance		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.4.1	The entity ensures families, carers and communities are aware of the roles and responsibilities of personnel providing ministries or activities directly to their children	✓			
Observations:					
Requirements of the Indicator are in place. No recommendations for improvement noted.					
Criterion 3.5 - The entity takes a leadership role in raising community awareness of the dignity and rights of all children		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.5.1	Appropriate to the context or setting, the entity actively promotes and/or participates in civic engagement activities and/or campaigns which promote whole of community awareness of children's rights and child abuse prevention	✓			
Observations:					
Requirements of the Indicator are in place. No recommendations for improvement noted.					

Standard 4	Equity is promoted and diversity is respected				
Equity is upheld and diverse needs respected in policy and practice					

Criterion 4.1 - The entity actively anticipates children's diverse circumstances and backgrounds, and provides support and responds effectively to those who are vulnerable		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
4.1.1	The entity's Child Safeguarding Policy and practices reflect an understanding, and identification, of diverse circumstances and experiences that increase a child's vulnerability to abuse	✓			
4.1.2	The entity's Complaints Handling Policy and practices demonstrate an understanding of barriers that prevent children from disclosing abuse and barriers for adults recognising and/or responding to disclosures, and articulates processes that reduce barriers to disclosure	✓			

Observations:

Requirements of the Indicators are in place. No recommendations for improvement noted.

Criterion 4.2 - All children have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
4.2.1	The entity produces child friendly material in accessible language and formats that promotes inclusion and informs all children of the support and complaints processes available to them			✓	

Observations:

The Diocese is yet to produce child-friendly material regarding support and complaints processes. Refer recommendation #5.

Criterion 4.3 - The entity pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with a disability, and children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and children of diverse sexuality		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
4.3.1	The entity's Child Safeguarding Policy and practices reflect attitudes and behaviours that respect the human rights of all children and are inclusive and responsive to diverse needs	✓			

Observations:

Requirements of the Indicators are in place. No recommendations for improvement noted.

Standard 5	Robust Human Resource Management

People working with children are suitable and supported to reflect child safeguarding values in practice

Criterion 5.1 - Recruitment, including advertising, interview questions, referee checks and personnel pre-employment screening, emphasises child safeguarding		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.1.1	The entity emphasises its commitment to child safeguarding and zero-tolerance approach to child abuse in all aspects of its advertising, screening and recruitment for personnel		✓		
5.1.2	The entity documents its safeguarding approach in recruitment and screening procedures and processes			✓	
5.1.3	Positions are assessed for the expected level of contact with children and appropriate child safeguarding recruitment procedures are implemented		✓		
5.1.4	Position descriptions, selection criteria, referee checks and interview questions articulate: • that children are valued and respected • the commitment of the entity to child safeguarding • where appropriate to the role, an understanding of children's developmental needs and culturally safe practices			✓	

Observations:

Given the small number of staff and infrequent recruitment, the Diocese has to date had an informal approach to including safeguarding requirements in advertising and screening of roles - these practices need to be documented and consistently applied, including for volunteers. Refer recommendation #6.

Criterion 5.2 - Relevant personnel (including all seminarians, clergy and religious) have current working with children checks or equivalent background checks		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.2.1	The entity has a policy which is implemented that ensures: • Personnel have a current working with children check as required by legislation, prior to working with children; and • Where a working with children check is not required by legislation, other background checks for personnel are conducted prior to working with children		✓		
5.2.2	The entity keeps records and monitors the status of working with children checks and/or background checks for all personnel		✓		

Observations:

Whilst we noted no breaches of legislative requirements, there is significant variation between parishes as to which volunteers are required to obtain a working with children check and/or National Criminal History check. Refer recommendation #7.

Criterion 5.3 - Personnel receive appropriate induction and are aware of child safeguarding responsibilities, including reporting obligations		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.3.1	All personnel participate in a safeguarding induction program, which occurs as soon as possible after commencement			✓	
5.3.2	All Church Authorities (along with members of their leadership team) who are signatories to the Catholic Professional Standards Ltd Service Agreement participate in the National Catholic Safeguarding Standards Introductory Session for Leaders within four months of commencement	✓			

Criterion 5.4 - Ongoing supervision and people management is focused on child safeguarding	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.4.1	Support, mentoring, oversight and professional supervision processes for personnel include child safeguarding	✓			
5.4.2	Annual performance reviews for personnel include child safeguarding responsibilities relevant to their role		✓		

Criterion 5.5 - Robust processes exist for screening candidates before and during seminary and religious formation. Robust processes are implemented for ongoing formation, support and supervision of clergy and religious	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.5.1	The Church Authority draws upon broad-ranging professional advice in its decision-making relating to candidates for seminary/formation programs and ordination/profession of vows. This includes a positive duty to disclose to other Church Authorities where an applicant or candidate for seminary/formation programs does not continue through to ordination/profession of vows.	✓			
5.5.2	Seminary and initial formation programs have robust screening processes for candidates for religious ministry, including external psychological and psychosexual assessments	Out of scope for this audit			
5.5.3	The entity promotes as normative the participation of all bishops, leaders of religious institutes, clergy and religious in active ministry, in no less than 6 hours professional/pastoral supervision per year			✓	
5.5.4	The entity promotes as normative, all clergy and religious in active ministry, for the sake of proper accountability, are offered and access both ongoing professional development and annual performance appraisals		✓		
5.5.5	All newly ordained clergy and newly professed religious are supported with a suitable mentor for at least five years post ordination or final profession		✓		

Criterion 5.6 - Seminary and formation programs for clergy and religious have curriculum to build the knowledge and skills of candidates to understand and lead child safeguarding initiatives	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.6.1	Seminary and initial formation programs have appropriate curriculum throughout the formation program which builds candidates' knowledge and skills in a range of areas to support child safeguarding	Out of scope for this audit			

5.6.2	Seminary and initial formation programs ensure promotion of pastoral responses to victims/survivors of sexual abuse	Out of scope for this audit			
5.6.3	Seminary and initial formation programs are delivered in such a way as to protect against the development and/or reinforcement of clericalist attitudes and behaviours	Out of scope for this audit			

Observations:

Refer 5.5.2 above.

Criterion 5.7 - Credentialing and movement of seminarians, clergy and religious is appropriately managed	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.7.1	The entity implements a system to assess the credentials and manage movement of all seminarians, clergy and religious moving between different seminaries and Church jurisdictions	✓			

Observations:

Requirements of the Indicator are in place. No recommendations for improvement noted.

Criterion 5.8 - Entities which receive overseas clergy and religious for work in ministry have targeted programs for the screening, induction, professional supervision and development of these individuals.	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.8.1	Selection and screening procedures for overseas clergy and religious are targeted, thorough and follow, as far as practicable, the same processes as for Australian personnel. This includes the Australian Church Authority obtaining screening information from the international Church Authority	✓			
5.8.2	All overseas clergy and religious participate in a Safeguarding Induction program, documented by the entity, before work with children begins	✓			
5.8.3	Overseas clergy and religious are supported with a suitable mentor for at least the first two years of their time in Australia	✓			
5.8.4	The entity promotes as normative the participation of all overseas clergy and religious in active ministry in no less than 6 hours of professional/pastoral supervision per year			✓	

Observations:

5.8.4   Refer 5.5.3 above.

Standard 6	Effective Complaints Management				
Processes for raising concerns and complaints are responsive, understood, accessible and used by children, families, carers, communities and personnel					

Criterion 6.1 - The entity has an effective Complaints Handling Policy and procedures which clearly outline the roles and responsibilities, approaches to dealing with different types of complaints, reporting obligations and record keeping requirements		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.1.1	The entity's policies, procedures and practices ensure that all mandatory reporting obligations are met		✓		
6.1.2	There are clear procedures that provide step-by-step guidance on what action to take for different types of complaints, including breaches of Codes of Conduct, disclosures, allegations or concerns of abuse of a child, be they historic or current	✓			
6.1.3	There are clear procedures for identifying and mitigating actual and perceived conflicts of interest in complaint management		✓		
6.1.4	The entity works in cooperation with relevant organisations and seeks specialist advice from statutory child protection services when necessary	✓			
6.1.5	Key roles and responsibilities in relation to handling complaints are articulated within the Complaint Handling Policy and procedures	✓			
6.1.6	The Complaint Handling Policy and procedures differentiate, where appropriate, between a child victim and an adult bringing forward a complaint of abuse suffered as a child	✓			
6.1.7	A process is in place to record all child abuse complaints, incidents, allegations, disclosures, concerns and referrals. The system must be secure so that confidential information is stored, protected and retained for 50 years		✓		

Observations:

6.1.1   Information has been provided to personnel and volunteers regarding the Reportable Conduct scheme, however relevant policies and procedures are yet to be updated. Refer recommendation #11.

6.1.3   The Code of Conduct does not specifically reference the handling of conflicts of interest. Refer recommendation #11.

6.1.7   The Diocese has a record keeping policy however it does not refer to safeguarding matters. Refer recommendation #4.

Criterion 6.2 - The entity has a child-focused complaints handling system that is understood by children, families, carers and personnel		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.2.1	The complaints handling system prioritises the safety and well-being of children	✓			
6.2.2	Complaints Handling Policy and procedures are publicly available in a variety of formats, including age and developmentally appropriate for children, enabling complaints processes to be easily understood		✓		

Observations:

6.2.2   Complaints handling procedures are publicly available, however are not provided in age-appropriate and meaningful formats for children. Refer recommendation #11.

Criterion 6.3 - Complaints are taken seriously, and responded to promptly and thoroughly	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.3.1	The Complaints Handling Policy requires that, upon receiving a complaint of child abuse, an initial risk assessment is conducted to identify and minimise any risk to children. Ongoing risk assessments are required throughout all investigation processes		✓		
6.3.2	The Complaints Handling Policy requires that at the completion of the initial risk assessment, where a complaint of child sexual abuse is plausible, and there is a risk that the person may come into contact with children, the person be stood down from their role and/or ministry while the complaint is investigated		✓		
6.3.3	The Complaints Handling Policy is aligned, and operates in conjunction, with the entity's documented disciplinary and grievance policies and processes, in such a way that at the completion of the initial risk assessment, a breach or breaches of the Code of Conduct in relation to inappropriate behaviour towards a child are effectively investigated and managed, and include provisions for personnel to be redeployed, stood down and/or dismissed	✓			
6.3.4	Complainants are responded to promptly and kept informed as to the progress of dealing with their complaint	✓			
6.3.5	Support and care are provided to a child who has experienced or is alleging abuse, and other affected parties	✓			
6.3.6	Appropriate confidentiality is maintained with due regard for the Australian Privacy Principles and relevant legislation in relation to information sharing in the context of child safeguarding	✓			
6.3.7	There are documented policies and processes implemented that empower and support personnel to raise, in good faith, concerns and allegations about unacceptable behaviour towards children by other personnel	✓			
6.3.8	Where a complaint related to child sexual abuse against a seminarian, clergy or religious is substantiated on the balance of probabilities, with due respect to the rights of individuals, the Church Authority should remove that individual from ministry	✓			
6.3.9	Where a seminarian, clergy or religious is convicted of an offence relating to child sexual abuse, that individual should be permanently removed from ministry. The Church Authority must take practicable steps to prohibit that individual from holding themselves out as being a person with religious authority and should present a case to the relevant dicastery for dismissal from the clerical state and/or dispensation from vows	✓			

Observations:

6.3.1/6.3.2 Parishes are aware of and enforce the requirement for risk assessments where an incident has occurred or complaint has been made, however this process is not specifically documented or mentioned in the safeguarding policy documents. Refer recommendation #11.

Criterion 6.4 - The entity has policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and co-operates with law enforcement	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.4.1	The Complaints Handling Policy requires that: • concerns and complaints of child abuse occurring within the entity be reported to the appropriate statutory authority/ies, regardless of whether the reporting is mandated; and • personnel cooperate with law enforcement procedures and directives		✓		

Observations:
Refer 6.1.1 above.

Criterion 6.5 - Reporting, privacy and employment law obligations are met	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.5.1	The Complaints Handling Policy requires that all relevant reporting, privacy and employment law obligations are met	✓			

Observations:
Requirements of the Indicators are in place. No recommendations for improvement noted.

Criterion 6.6 - The Church Authority ensures mechanisms are in place to care for adult complainants	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.6.1	The entity offers appropriate pastoral care to adult complainants, which recognises their unique needs. This includes an offer from the Church Authority to meet the complainant in person	✓			
6.6.2	The Church Authority facilitates adult complainants' access to appropriately trained personnel whose clearly defined roles are to listen to and represent the pastoral needs of the complainant. This is done in consultation with the complainant	✓			

Observations:
Requirements of the Indicators are in place. No recommendations for improvement noted.

Criterion 6.7 - The Church Authority ensures mechanisms are in place to monitor and support respondents facing allegations	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.7.1	The Church Authority has access to appropriately trained personnel - lay, religious or clergy - whose clearly defined roles are to listen to and represent the pastoral needs of the respondent. This is done in consultation with the respondent	✓			
6.7.2	The Church Authority has suitable arrangements in place for the monitoring and support of a respondent, where there is a plausible complaint, until (and if) the Church Authority no longer has responsibility for monitoring the respondent	✓			

Observations:
Requirements of the Indicators are in place. No recommendations for improvement noted.

Standard 7	Ongoing education and training				

Personnel are equipped with knowledge, skills and awareness to keep children safe through information, ongoing education and training

Criterion 7.1 - Personnel are trained and supported to effectively implement the entity's child safeguarding policies and procedures		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
7.1.1	The entity provides regular opportunities to educate and train personnel on child safeguarding policies and procedures, as a minimum through: • induction; and • refresher safeguarding training (at least every three years)			✓	
7.1.2	The entity's induction and refresher safeguarding training must as a minimum cover: • Code of Conduct • safeguarding risk management • Child Safeguarding Policy and procedures • Complaints Handling Policy and procedures • reporting obligations • e-safety training			✓	
7.1.3	The entity keeps records of participation to ensure all personnel attend induction and refresher safeguarding training			✓	
7.1.4	The entity ensures that personnel who have specific child safeguarding responsibilities, such as those appointed to the role of safeguarding coordinator and those appointed to the Safeguarding Committee, receive ongoing support and professional development relevant to their role		✓		

Observations:

The Diocese does not have a formal safeguarding training framework for personnel. Refer recommendation #12.

Criterion 7.2 - Personnel receive training to recognise the nature and indicators of child abuse, including harmful behaviours by a child towards another child		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
7.2.1	The entity provides regular training to relevant personnel which equips them with the knowledge to: • understand the nature and impact of child abuse • understand the nature, factors and impact of institutional abuse • identify risk factors, such as grooming behaviours; and • understand, identify and respond to abusive behaviours by a child towards another child			✓	

Observations:

The Diocese does not have a formal safeguarding training framework for personnel. Refer recommendation #12.

Criterion 7.3 - Personnel receive training to enable them to respond effectively to child safeguarding risks, concerns, disclosures and allegations of child abuse		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
7.3.1	The entity provides training to equip relevant personnel to appropriately respond to and support those bringing forward concerns, disclosures and allegations of child abuse			✓	
7.3.2	The entity provides training to ensure personnel are aware of information sharing and record keeping policies and procedures			✓	
7.3.3	The entity provides training to ensure personnel are aware of their reporting obligations under State/Territory legislative requirements including: • reporting criminal behaviour to police • mandatory reporting to child protection authorities • Reportable Conduct Scheme • reporting to regulatory authorities/government departments			✓	

Observations:

7.3.1/7.3.3   The Diocese does not have a formal safeguarding training framework for personnel. Refer recommendation #12.

7.3.2   The Diocese has a record keeping policy however it does not refer to safeguarding matters. Refer recommendation #4.

Criterion 7.4 - Personnel receive training and information on how to build culturally safe environments for children		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
7.4.1	The entity provides cultural safety training to equip relevant personnel to create culturally safe environments for Aboriginal and Torres Strait Islander children and children from culturally and linguistically diverse backgrounds				✓

Observations:

The Diocese does not have a formal safeguarding training framework for personnel. Refer recommendation #12.

Standard 8	Safe physical and online environments

Physical and online environments promote safety and contain appropriate safeguards to minimise the opportunity for children to be harmed

Criterion 8.1 - Personnel identify and mitigate risks in online and physical environments without compromising a child's right to privacy, access to information, social connections and learning opportunities		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
8.1.1	The entity's safeguarding risk management plan addresses physical and online risks including risks arising from child-to-child and adult-to-child interactions, and the nature of physical spaces		✓		
8.1.2	The entity's policies require the use of safe online applications for children to learn, communicate and seek help		✓		
8.1.3	Personnel are proactive in identifying and mitigating physical and online risks to children		✓		
8.1.4	A policy is documented and implemented that ensures where one-to-one interactions between an adult and child take place, these interactions are conducted in an open or visible space, or within the clear line of sight of another adult. This includes ministries and/or services such as counselling, one-to-one tuition, the sacrament of reconciliation, coaching, spiritual direction and mentoring. Where the sacrament of reconciliation is celebrated using the first form of the Rite of Penance, that is, the Rite for Reconciliation of Individual Penitents, the policy may provide for this to occur in a chapel or other space within a church that is set apart for this purpose, so long as any physical contact between the penitent and the cleric is precluded.	✓			

Observations:

8.1.1/8.1.3   The Diocese has an overall risk management plan which includes high level safeguarding risks. Whilst all parishes are aware of their key safeguarding risks, not all parishes have formally documented these using the standard risk assessment templates. Refer recommendation #3.

8.1.2   The Diocese has an IT policy setting out expectations around the safe use of technology, however a process for monitoring of IT devices has not yet been established. Refer recommendation #13.

Criterion 8.2 - The online environment is used in accordance with the entity's Code of Conduct, safeguarding policies and procedures		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
8.2.1	Personnel access and use online environments in line with the entity's Code of Conduct and relevant communication protocols			✓	
8.2.2	The entity routinely monitors the online environment, reporting and responding to breaches of its Code of Conduct or safeguarding policies in accordance with the entity's disciplinary, complaints handling or other relevant processes				✓

Observations

The Diocese has an IT policy setting out expectations around the safe use of technology however it is not well known or utilised in the parishes. There is also no monitoring of internet activity. Refer recommendation #13.

Criterion 8.3 - Risk management plans consider risks posed by the entity's settings, activities and physical environments	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
8.3.1	The entity assesses and mitigates safeguarding risks in the physical environments under its control and/or management, including buildings, structures, open spaces, grounds, homes of religious and clergy, and arrangements for live-in carers/caretakers.		✓		
8.3.2	Where an entity becomes aware that a person (other than personnel of that entity) attending any of its services or activities (including sacramental and liturgical celebrations) is the subject of a substantiated complaint of child abuse or has been convicted of an offence relating to child sexual abuse, the entity has in place and implements a process for assessing and managing the risks posed to children by that person's ongoing involvement in the service or activity.		✓		

Observations:

8.3.1   The Diocese has an overall risk management plan which includes high level safeguarding risks. Whilst all parishes are aware of their key safeguarding risks, not all parishes have formally documented these using the standard risk assessment templates. Refer recommendation #3.

8.3.2   The Diocese has structured processes in place to manage persons of concern or known offenders who may be attending its services and/or activities, however these processes are not well known across all parishes and therefore could be applied inconsistently. Refer recommendation #14.

Criterion 8.4 - Entities that contract facilities and services to and from third parties have procurement policies that ensure safeguarding of children	Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
8.4.1	The entity considers the risks posed to children arising from any third parties engaged by the entity and conducts sufficient due diligence to ensure that the third party has appropriate child safeguarding policies and practices in place	✓			
8.4.2	The entity has conducted sufficient due diligence on all third parties who use the entity's facilities to ensure child safeguarding policies and practices are in place.			✓	

Observations:

8.4.2   Processes to conduct due diligence on third parties using the church entity's facilities are informal and vary between parishes. Refer recommendation #15.

Standard 9	Continuous improvement				
Entities regularly review and improve implementation of their systems for keeping children safe					

Criterion 9.1 - The entity regularly reviews and improves child safeguarding practices		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
9.1.1	The entity has a clearly documented Safeguarding Implementation Plan which outlines the monitoring and continual improvement of child safeguarding practices The Safeguarding Implementation Plan is regularly reviewed, progress is tracked and actions/strategies updated			✓	
9.1.2	The Church Authority monitors compliance with the National Catholic Safeguarding Standards during systematic visits to parishes, ministries and/or congregational works			✓	
9.1.3	The Safeguarding Committee co-ordinates annual self-audits at a local level (parishes, ministries and/or congregational works)			✓	
9.1.4	The entity's Child Safeguarding Policy is subject to regular review – at least every three years	✓			

Observations:

The Diocese will be developing a Safeguarding Implementation Plan and formal self-audit program based on the outcomes of this audit. Refer recommendation #16.

Criterion 9.2 - The entity analyses concerns and complaints to identify causes and systemic failures to inform continuous improvement		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
9.2.1	Processes are in place to analyse individual incidents or complaints relating to child safeguarding practices and/or failures	✓			
9.2.2	Processes are in place to identify and analyse systemic issues and/or patterns relating to child safeguarding practices and/or failures, and drive continuous improvement	✓			

Observations:

Requirements of the Indicators are in place. No recommendations for improvement noted.

Criterion 9.3 - The Church Authority reports on the findings of relevant reviews to personnel, children, families, carers and community		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
9.3.1	The Church Authority promotes to all its stakeholders any Audit Reports relating to the Church Authority, and related entities, published by Catholic Professional Standards Ltd.	Not relevant			
9.3.2	The Church Authority reports on findings of relevant reviews of safeguarding policies, procedures and practices to its stakeholders	Not relevant			

Observations:

N/A – there are no such reports or reviews to date.

Standard 10	Policies and procedures support child safety				
Policies and procedures document how the entity is safe for children					

Criterion 10.1 - Policies and procedures address National Catholic Safeguarding Standards		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.1.1	All relevant policies and procedures reference appropriate safeguarding approaches, requirements and responsibilities		✓		
Observations:					
Refer recommendations #1 to #16.					

Criterion 10.2 - Policies and procedures are accessible and easy to understand		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.2.1	The entity's policies & procedures relevant to safeguarding are readily available and accessible to personnel		✓		
Observations:					
Refer recommendations #1 to #16.					

Criterion 10.3 - Best practice policy models and stakeholder consultation inform the development and review of policies and procedures		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.3.1	The entity has processes in place to monitor adherence to policies and procedures relevant to safeguarding			✓	
10.3.2	The entity has a process in place to develop and review its policies and procedures relevant to safeguarding These processes include consulting with and incorporating advice from experts, children, families, carers and communities		✓		
Observations:					
Refer recommendations #1 to #16.					

Criterion 10.4 - The Church Authority and leaders model compliance with policies and procedures		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.4.1	The Church Authority and leaders promote and enact all policies and procedures relevant to safeguarding		✓		
Observations:					
Refer recommendations #1 to #16.					

Criterion 10.5 - Personnel understand and implement the policies and procedures		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.5.1	The entity encourages regular discussion and feedback from personnel on their understanding and practical implementation of the policies and procedures	✓			
Observations:					
Requirements of the Indicator are in place. No recommendations for improvement noted.					

3. Detailed Findings

Standard 1: Committed Leadership, governance and culture

Child safeguarding is embedded in the entity's leadership, governance and culture

Recommendation #1	Priority 2
Criterion 1.1 - The entity publicly commits to child safeguarding and takes a zero-tolerance approach to child abuse	

Details of finding	The Diocese has a Commitment Statement to Child Safety and a Child Safety Policy which are publicly available on the diocesan website. A template of the Child Safety Policy has also been made available to parishes so that each parish can create a Child Safety Policy for their own parish. The following points were noted: - The Commitment Statement was not openly displayed and/or available on the parish websites for four of the eleven parishes reviewed. - The Diocese has a separate Safeguarding Children and Vulnerable Adults Policy, which seems to overlap with the Child Safety Policy. - All safeguarding policies and documents are currently located within the Professional Standards section of the diocesan website - the path to access this part of the website is not intuitive (Catholic Diocese of Ballarat/Service & Agencies/Welfare/Professional Standards) and requires some effort in browsing the website in order to find the required safeguarding documents.
Recommendation	1. The existing Diocesan Commitment Statement should be expanded to include reference to vulnerable adults, to align with the requirements in the Safeguarding Children and Vulnerable Adults Policy. 2. The Child Safety Policy should be amalgamated with the Safeguarding Children and Vulnerable Adults Policy so that all safeguarding requirements are contained in one Policy document. 3. All parishes should be reminded of the requirement to ensure both the Commitment Statement and the Safeguarding policy are on public display and are easily accessible on the parish website, including being displayed in all facilities hired out by the parish to third parties (refer also recommendation #15). 4. The Diocese should consider placing a direct link to all Safeguarding documents and policies from the home page of the diocesan website.
Agreed Action	1. The Diocese will amend and rationalise its Statement of Commitment and Child Safety Policy as recommended. 2. The Diocese will remind the parishes of the need to ensure the Commitment Statement and Safeguarding Policy are on public display and easily accessible on the parish websites and in all parish facilities. 3. The Diocese will improve the visibility of the safeguarding documents on the diocesan website.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	Item 1 - 31 December 2019 Item 2 - 30 September 2019 Item 3 - 30 November 2019

Recommendation #2	Priority 2
Criterion 1.4 - A Code of Conduct provides guidelines for personal on expected behavioural standards and responsibilities	

Details of finding	The Diocese has three Codes of Conduct - 1) Code of Conduct for Caring for Children; 2) Child Safety Code of Conduct; and 3) Code of Conduct for the Pastoral Care of Vulnerable Adults: • The Code of Conduct for Caring for Children is very detailed and covers working with children checks, specific requirements for supervising activities with children and complaints handling procedures. The Child Safety Code of Conduct is more succinct and covers acceptable and unacceptable behaviours to support child safety. The Code of Conduct for the Pastoral Care of Vulnerable Adults covers specific requirements for maintaining appropriate relationships with vulnerable adults. Whilst the three documents have different intentions, they could be streamlined to promote clarity and consistency in one application. • The method of communicating the Code of Conduct to parish staff and volunteers varies significantly - some parishes include a copy in their volunteer information, others require the Code to be signed and returned to the parish office, whilst other parishes do not formally distribute the Code. In addition, not all parishes require the Code to be signed/acknowledged by clergy. • The Codes do not contain consequences or actions as a result of breaches of the Code. • Whilst the three Codes of Conduct are relatively current, there is no review schedule in place for these documents.
Recommendation	1. The Diocese should streamline the Code of Conduct with a view to having one Code of Conduct which outlines expected behaviours for interaction with all those who come in contact with, or participate in, activities/ ministries within the Diocese, including specific requirements for children and vulnerable adults. 2. The Code should be updated to include clear consequences for breaches of the Code, including how the Code interfaces with existing disciplinary procedures. 3. A standardised approach should be developed to disseminate the Code of Conduct to staff and volunteers. We recommend that the Code of Conduct be included as part of the information pack provided to staff and volunteers upon commencement and that acknowledgment by the staff member/volunteer of the Code and related policy documents be documented by the parish. This requirement should apply retrospectively to existing staff and volunteers. 4. All clergy in active ministry (including those who are retired and still capable of ministering) should sign the Code and return it to the diocesan safeguarding office. 5. The Code of Conduct should be subject to regular review and update.
Agreed Action	1. The Diocese will combine and update the Code of Conduct as recommended. A review date will be included, specifying the date of the next review and update. 2. The Diocese will work with parishes to ensure processes are established to ensure uniformity in the manner in which the Code is communicated to and acknowledged by parish staff and volunteers. 3. The Diocese will request all clergy in active ministry to acknowledge and sign the updated Code and forward to the Diocesan Safeguarding office.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	Items 1 and 2 - 31 December 2019 Item 3 - Instructions for acknowledgement of the Code by all clergy to be disseminated with the updated Code - 31 January 2020

Recommendation #3	Priority 2
Criterion 1.5 The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children	

Details of finding	The Diocese has an overall risk management plan which includes high level safeguarding risks. A template has been provided to parishes along with guidance on conducting a risk assessment for their key ministries and activities - whilst all parishes we reviewed were aware of key safeguarding risks and had processes in place to address these, only five out of the eleven parishes reviewed had formally documented these risk assessments. Risk assessments were often filed and there was no formal process in place for updating the risk assessments on a regular basis. In addition, parishes are not required to submit their risk assessments to the diocesan office so there is little visibility at the Diocese level over what the key risk areas are for the parishes and/or the mitigation treatments/supports that are required. Further, whilst all parishes discussed child safety as required at their Pastoral Council and/or leadership meetings, it was not noted as a formal, standing agenda item at these meetings.
Recommendation	1. Parishes should document risk assessments for their key activities as soon as possible - in this regard, we recommend that the risk assessments already completed by the larger parishes be provided to other parishes as examples which can be adapted, given many of the parish activities and ministries will be similar. 2. Parishes should be required to include safeguarding as a standing agenda item for their Pastoral Council/leadership meetings, with the requirement to review/monitor their completed risk assessments on a regular (at least quarterly) basis. 3. The quarterly review of risks as noted above should be provided by each parish to the diocesan office so that the Diocese has visibility over the key risks arising in parishes, including the appropriate mitigation activities.
Agreed Action	1. Parishes have in the past been requested to use the template provided to conduct a risk assessment - this requirement will be reiterated to all parishes. The Diocese will also assist parishes by providing them with example risk assessments from larger parishes as a guide. 2. Parishes have previously been requested to include safeguarding as an agenda item at Pastoral Council/leadership meetings - this requirement will be reiterated to all parishes. 3. The Diocese will request the parishes to provide a quarterly review of risks to enhance compliance and provide visibility at the Diocese level over key risks.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	Items 1 and 2 - 30 September 2019 Item 3 - 31 December 2019

Recommendation #4		Priority 3
Criterion 1.6 Personnel understand their obligations on information sharing and record keeping		
Details of finding	There is an existing policy on record keeping at the diocesan level however it is focused on retention of finance records and other legal documents and does not contain requirements for retention of safeguarding records (such as WWCC and National Criminal History checks, incident and complaint handling etc).	
Recommendation	The Safeguarding policy should be updated to include a section on retention and secure storage of safeguarding documents, including a standardised approach to data collection, confidentiality, use of information and data sharing. The policy should take into account the record keeping principles noted in the NCSS, Indicator 1.6.2.	
Agreed Action	The Diocese will update its record keeping policy as recommended.	
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel	
Due date	31 March 2020	

Standard 2: Children are safe, informed and participate

Children are informed about their rights, participate in decisions that affect them and are taken seriously

Standard 3: Partnering with families, carers and communities

Families, carers and communities are informed and involved in promoting child safety

Standard 4: Equity is promoted and diversity is respected

Equity is upheld and diverse needs respected in policy and practice

Recommendation #5	
Criterion 2.1 Children are informed about their rights, including safety, information and participation	**Priority 3**
Criterion 3.3 Families, carers, communities have a say in the entity's policies and practices	
Criterion 4.2 All children have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand	

Details of finding	There is good engagement at the parish level with families and communities regarding child safeguarding practices and the Diocese has produced a number of Child Safety "tip" sheets such as teaching your child how to keep themselves safe, cultural safety for Aboriginal children, safety for children from culturally and linguistically diverse backgrounds and safety for children with disabilities. However, much of this information is geared towards adults and is not in a child-friendly format.
Recommendation	We recommend the Diocese develop child friendly materials on the key aspects of the Diocesan Safeguarding policy, including: • Safeguarding Commitment • Key measures of how the Diocese aims to keep children safe • Expectations of church personnel and the rights of children • Complaints Handling process (who to contact and how to raise a concern) These should be written in child-friendly language and be easily accessible (e.g. via a poster, the parish website, a welcome pack or safety card). In addition, the Diocese could assist parishes to engage with families and children, provide information and obtain their feedback on: • The activities the parish is running throughout the year and the perceptions of how effectively safeguarding requirements are applied within the parish; • Information on the Diocesan Safeguarding policy, Code of Conduct and key contacts (e.g. details of safeguarding officer, parish/pastoral council etc); and • The process to raise concerns and complaints, including perceptions of how effectively the parish/Diocese is responding to these.
Agreed Action	The Diocese will address this recommendation by enlisting the assistance of Catholic Education and other Church entities that have developed child friendly materials, as well as CPSL, in the development of material suitable for use in the Diocese. The Diocese will also create a guide to assist parishes to engage with families and children about safeguarding in their parish.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	30 June 2020

Standard 5: Robust Human Resource Management

People working with children are suitable and supported to reflect child safeguarding values in practice

Recommendation #6	Priority 2
Criterion 5.1 Recruitment, including advertising, interview questions, referee checks and personnel pre-employment screening, emphasises child safeguarding	

Details of finding	The Diocese does not have a formal recruitment policy given the small number of staff employed within the diocesan office. Safeguarding requirements relating to screening and recruitment of diocesan staff are included in Section 10 of the Child Safety Policy. There is also a separate policy for conducting Working with Children Checks and National Criminal History Checks. However, there is no reference to safeguarding in job advertisements, position descriptions (where available) or referee questions. In addition, a formal risk assessment in terms of contact with children is not documented, although we do note that there is consideration of the position's interaction with children and accordingly, a WWCC and National Criminal History Check is conducted where required. In relation to volunteers, recruitment and screening processes are informal and not documented.
Recommendation	1. We recommend that the Diocese update its recruitment practices to ensure that the appropriate safeguarding requirements are incorporated into the advertising, screening and recruitment processes as required. This should include consideration and documentation of the level of contact with children at the start of the recruitment process, so as to inform the required safeguarding checks for the role (e.g. interview questions, referee questions, background checks etc). 2. A position description should be available for all staff and key volunteer roles, which documents their safeguarding requirements commensurate with that role. 3. The recruitment and screening process for new volunteers needs to be documented and retained within the parishes, giving appropriate regard to assessing the volunteer's suitability for ministry with respect to safeguarding requirements.
Agreed Action	The Diocese will develop, update and document volunteer and employee recruitment processes including interview templates, screening processes and position descriptions to address this recommendation.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	30 April 2020

Recommendation #7	**Priority 2**
Criterion 5.2 Relevant personnel have current working with children checks or equivalent background checks	

Details of finding	The Diocese has a Working with Children Check and National Police Record Check Policy which provides some guidance in relation to conducting these checks. The following points were noted: 1. National Criminal History checks are only required on commencement for employees, volunteers, clergy, religious and seminarians - subsequent National Criminal History checks are at the discretion of the individual's manager or superior. 2. In relation to working with children checks, whilst all parishes that we reviewed had the required legislative checks where volunteers are working directly with children (for e.g. those administering children's liturgy), there was substantial variation in the requirement for checks in other key volunteer roles such as Extraordinary Eucharistic Ministers, Sacristans and Pastoral Council members. This situation has arisen due to differences in interpretation of the Working with Children Check and National Police Record Check policies at the parish level and gives rise to potential safeguarding risks, in particular where individuals move between roles and/or parishes across the Diocese.
Recommendation	1. The Working with Children Check and National Police Record Check Policy should be amended to provide a consistent approach to conducting checks for similar roles across the Diocese. In this regard, we recommend the Diocese creates a volunteer risk matrix which assesses the nature and risk level of standard volunteer roles and specifies the requirement for a working with children check and/or National Criminal History check for each role. 2. The volunteer risk matrix should be rolled out across the Diocese and the parishes made accountable for monitoring and ensuring compliance with the matrix. Clear and consistent processes should be enforced for instances of non-compliance, including standing down/removing a volunteer from ministry until the required check is obtained. 3. Where a particular role - either volunteer, paid employee, religious or clergy - is assessed as requiring a National Criminal History check, this should be renewed on a regular basis, e.g. every three years. 4. Documentation related to legislative checks should be retained for a minimum of 50 years as per NCSS Indicator 1.6.2, including for those individuals (whether volunteer, paid employee, religious or clergy) who have since left the Diocese.
Agreed Action	The Diocese will amend its WWCC and Police Check Policy in line with this recommendation, with the need for a person to hold a WWCC and/or Police check to be determined on the basis of risk. A process will also be established to ensure that documentation related to legislative checks is retained for a minimum of 50 years and that this requirement is included in the updated record keeping policy (refer also recommendation #4).
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	31 December 2019 for amendments to WWCC and Police Check Policies 31 March 2020 for updated record keeping policy

Recommendation #8		Priority 2
Criterion 5.3 Personnel receive an appropriate induction and are aware of their child safeguarding responsibilities, including reporting obligations		

Details of finding	Only three parishes of the eleven reviewed had formal safeguarding induction programs in place. These tended to be in the larger parishes, with other parishes providing the relevant safeguarding policies, procedures and materials to volunteers on a case by case basis.

Recommendation	1. Safeguarding induction material should be accessed/developed, covering the following:
	
	    a) the Diocese's Code of Conduct and child safe policies and procedures
	
	    b) children's rights
	
	    c) respect for children, regardless of their individual characteristics, cultural backgrounds and abilities
	
	    d) safeguarding risk management, including strategies to identify, assess and minimise risk of harm to children
	
	    e) e-safety (safe use of technology and the online environment)
	
	    f) how to respond to a disclosure of harm from a child
	
	    g) complaints processes, including how to respond to a complaint about inappropriate behaviour towards children
	
	    h) reporting obligations, including reporting to police, child protection authorities, reportable conduct schemes and any other relevant agencies.
	
	NB: the online safeguarding training developed by Catholic Church Insurance (CCI), which was the basis of the training in 2016, could continue to be used for safeguarding induction training. We understand there is capacity for the Diocese to include its own diocesan policies and processes within this online training in order to customise/tailor the training to diocesan needs.
	
	2. Parishes should be held accountable for ensuring all staff and volunteers participate in safeguarding induction training, including developing a training calendar/schedule for their parish, keeping attendance records and following up those individuals who do not attend training. This will allow each parish to determine the best method of delivering the induction training, for e.g. providing links to the online training for volunteers in larger parishes or holding periodic induction training sessions in smaller parishes which have very few new volunteers and/or where internet connectivity for volunteers in these parishes would be an issue.
	
	3. Safeguarding induction training should be made retrospective for all existing staff and volunteers, unless the individual can provide evidence of having attended relevant external training within the past 12 months.

Agreed Action	The Diocese will prepare/access safeguarding induction material as recommended and develop a training framework to ensure participation in safeguarding induction training (refer also recommendation #12). All staff and volunteers will be required to undertake the CCI online training as part of the induction process.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	31 January 2020

Recommendation #9	Priority 3
Criterion 5.4 Ongoing supervision and people management is focused on child safeguarding	

Details of finding	Formal performance review processes are not in place for employees or for volunteers who have specific child safeguarding responsibilities. The performance of employees and volunteers is monitored and discussed with the relevant individual where required, however this process is not documented.
Recommendation	1. Performance review processes should be developed for all employees who have specific child safeguarding responsibilities. 2. In relation to volunteers, we recommend that a brief (one page) performance review template be developed which can be used by parishes to review performance of volunteers and that these be conducted for all roles which require a Working with Children Check/National Criminal History Check as per the Volunteer Risk Matrix (refer recommendation #7).
Agreed Action	The Diocese will develop the performance review process/documents as recommended.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	30 June 2020

Recommendation #10	Priority 3
Criterion 5.5 Robust processes exist for screening candidates before and during seminary and religious formation. Robust processes are implemented for ongoing formation, support and supervision of clergy and religious	

Details of finding	The following points were noted: 1. Processes for monitoring and support related to professional/pastoral supervision for clergy and religious working in the Diocese are currently being developed. 2. Appraisals for clergy are informal and conducted on an ad-hoc or as required basis. 3. Mentoring is in place for newly ordained priests and priests coming into the Diocese from overseas, however these arrangements are informal, and the mentoring period varies.
Recommendation	1. We encourage the Diocese to formalise their policy on professional/pastoral supervision and to provide support and assistance to clergy and religious who are having difficulty in finding suitable Supervisors - either through the organisation of group Supervision sessions or other similar forums to fulfil this requirement. 2. Performance review processes should be developed for all clergy and religious operating under the governance of the Diocese and in active ministry. 3. Mentoring periods for new priests within the Diocese should be aligned with the requirements of the NCSS - 5 years for newly ordained priests and 2-5 years (depending on the circumstances and nature of the appointment) for overseas clergy.
Agreed Action	The Diocese will implement formal professional/pastoral supervision, performance review and mentoring procedures for clergy and religious.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	30 June 2020

Standard 6: Effective complaints management

Processes for raising concerns and complaints are responsive, understood, accessible and used by children, families, carers, communities and personnel

Recommendation #11	
Criterion 6.1 - The entity has an effective Complaints Handling Policy and procedures which clearly outline the roles and responsibilities, approaches to dealing with different types of complaints, reporting obligations and record keeping requirements	**Priority 2**
Criterion 6.2 - The entity has a child-focused complaints handling system that is understood by children, families, carers and personnel	

Details of finding	Our review of complaints handling procedures indicated the following: 1. A formal communication has been provided to parishes and volunteers on the Victorian Reportable Conduct Scheme and its impact on reporting for religious organisations, however the Safeguarding Policy is yet to be updated to include these requirements. 2. Diocesan safeguarding policies do not specifically reference the process for managing potential conflicts of interest regarding the handling of incidents or complaints. 3. The Code of Conduct for Caring for Children sets out procedures for dealing with complaints and a flowchart has been developed setting out the steps for how to report breaches of the Code. Whilst we noted that the majority of parishes reviewed had this flowchart on the church noticeboard, the flowchart itself is not particularly user-friendly and does not contain phone numbers or contact details for the key persons/agencies required to be contacted. In addition, the existing complaints materials are not child-friendly or provided in a meaningful format for children to raise a concern or complaint. 4. Whilst all parishes reviewed were aware of the requirement to conduct a risk assessment in relation to a concern or complaint and in particular the potential need to stand down personnel or volunteers from ministry until the complaint is investigated, there are no documented guidelines in this area.
Recommendation	1. The safeguarding policy should be updated to include requirements relating to the Victorian Reportable Conduct Scheme, including providing the associated training in this area (refer also recommendations #8 and #13). 2. The Diocesan Child Safety Policy and Code of Conduct (refer also recommendation #1) should contain clear guidelines for how perceived or actual conflicts of interest are to be managed where incidents/complaints are required to be investigated and/or reviewed. 3. The flowchart for reporting of complaints should include relevant contact details for how to contact key persons or agencies when raising a concern or complaint. In addition, child friendly/age-appropriate complaint materials should be developed to assist children in raising a concern or complaint (refer also recommendation #5). 4. The safeguarding policy should include clear requirements for conducting a risk assessment, as per NCSS Indicators 6.3.1 and 6.3.2, upon receiving a complaint to ensure potential safeguarding risks are appropriately managed and monitored.
Agreed Action	1. The Diocese will update its Child Safety Policy and Code of Conduct as recommended. 2. The flowchart for reporting of complaints will be updated to ensure there are clear details for how to contact key persons or agencies when raising a concern or complaint. 3. The Diocese will develop child-friendly materials in relation to raising a concern or complaint in conjunction with the development of materials as per recommendation #5.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	Items 1 and 2 - 31 December 2019 Item 3 - 30 June 2020

Standard 7: Ongoing education and training

Personnel are equipped with the knowledge, skills and awareness to keep children safe through information, ongoing education and training

Recommendation #12	
Criterion 7.1 - Personnel are trained and supported to effectively implement the entity's child safeguarding policies and procedures	
Criterion 7.2 - Personnel receive training to recognize the nature and indicators of child abuse, including harmful behaviours by a child towards another child	**Priority 2**
Criterion 7.3 - Personnel receive training to enable them to respond effectively to child safeguarding risks, concerns, disclosures and allegations of child abuse	
Criterion 7.4 - Personnel receive training and information on how to build culturally safe environments for children	

Details of finding	The Diocese does not have a formal, diocesan training calendar or framework in place. Online safeguarding training was introduced in 2016 for all clergy, staff and volunteers, with the bulk of the personnel in the Diocese accessing the training at that time. The online training is still provided by some parishes to new volunteers, and the Diocese also requests key volunteers and safeguarding officers to attend specific safeguarding training, such as that provided by the National Council of Churches in Australia. Our audit procedures indicate that in general, there is compliance with these requirements, with key parish personnel receiving the required training. However, attendance is not monitored at the Diocese level and there is no follow up process in place for those who do not attend the required training.
Recommendation	1. A training framework should be put in place to ensure that all clergy, religious, staff and volunteers receive the appropriate safeguarding training. This should include a requirement for initial induction training (refer recommendation #8) as well as refresher training every three years. 2. For personnel with specific safeguarding responsibilities, such as the parish priest, parish secretary, safeguarding officers and volunteers who require a working with children check as per the volunteer risk matrix (refer recommendation #7), further in-depth safeguarding training should be provided, including case studies which focus on identifying and understanding the nature of abuse, recording and responding to complaints/disclosures and information on building culturally safe environments for children (as required). This training could initially be provided centrally by the Diocese and then continued using a "train the trainer" model, whereby parishes administer and monitor the training requirements themselves.
Agreed Action	The Diocese will address the recommendation by developing a training framework, based on the risk matrix referred to in recommendation #7.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	31 January 2020

Standard 8: Safe physical and online environments

Physical and online environments promote safety and contain appropriate safeguards to minimise the opportunity for children to be harmed

Recommendation #13		
Criterion 8.1 - Personnel identify and mitigate the risks in online and physical environments without compromising a child's right to privacy, access to information, social connections and learning opportunities		**Priority 3**
Criterion 8.2 - The online environment is used in accordance with the entity's code of conduct, safeguarding policies and procedures		
Details of finding	The diocesan IT policy is part of the Parish Administration Manual and provides for the monitoring of IT systems (cl 24.5), however there is currently no formalised process for this to occur. NB: Diocesan office devices, including those parish devices networked with the diocesan office, have appropriate filtering systems in place.	
Recommendation	1. The safe use of IT, including Code of Conduct expectations, should be covered in safeguarding induction and refresher training (refer recommendations #8 and #12). 2. A process should be established whereby laptops/computers owned by the Diocese and used by diocesan staff or volunteers are monitored for appropriate use and content. This could take the form of an annual check by the party/firm that provides IT services to the Diocese or alternatively, the Diocese could seek assistance from its education partners for guidance in this area.	
Agreed Action	1. The safe use of IT will be included in the training material developed as part of the training framework (refer recommendation #12). 2. The Diocese will address this recommendation by enlisting the assistance of Catholic Education and other Church entities to determine a cost-effective and appropriate method for monitoring of web browsing and use of IT.	
Responsibility	Item 1 - Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel Item 2 - Diocesan Business Manager reporting to The Diocesan Professional Standards Consultative Panel	
Due date	Item 1 - 31 January 2020 Item 2 - 30 June 2020	

Recommendation #14	Priority 2
Criterion 8.3 - Risk management plans consider risks posed by the entity's setting, activities and physical environments	

Details of finding	The Diocese has structured processes in place to manage persons of concern or known offenders who may be attending its services and/or activities, including conducting risk assessments and preparing formal church participation plans where required. However, these processes are not well known across all parishes, which may result in inconsistent treatment of such cases across the Diocese.
Recommendation	We recommend the Diocese distribute guidelines to parishes regarding the management of persons of concern and/or known offenders who may be worshipping in the community and/or attending church events.
Agreed Action	The Diocese will develop a formal policy to provide guidance regarding processes for managing persons of concern. The policy will be disseminated to parishes for noting and application, as required.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	30 November 2019

Recommendation #15	Priority 3
Criterion 8.4 Entities that contract facilities and services to and from third parties have procurement policies that ensure safeguarding of children	

Details of finding	Processes to conduct due diligence on third parties using the church entity's facilities are informal and vary between parishes. Only two of the eleven parishes reviewed were using the standard facilities agreement for external parties wishing to hire church premises.
Recommendation	All parishes should be instructed to use the standard facilities agreement when hiring parish facilities to third parties. This agreement should contain the appropriate references to safeguarding, for example: • the Diocese's expectations on safeguarding and zero-tolerance approach to child abuse; • the third party providing surety to the entity that they have policies and procedures in relation to safeguarding children or where they don't have their own policy, confirmation that they will adhere to the Diocese's safeguarding policies and procedures; • a letter of compliance from the management of the third party stating that all personnel have current Working with Children Checks (where required by legislation); and • records kept of any third parties using parish facilities, either regularly or occasionally. In addition, we recommend that the Diocesan Safeguarding Commitment Statement and Code of Conduct be displayed in all parish facilities as a reminder to all users of these facilities of the Diocese's emphasis and focus on safeguarding.
Agreed Action	The Diocese will develop a facilities agreement for use by parishes when hiring out parish facilities, as per the recommendation.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	31 March 2020

Standard 9: Continuous Improvement

Entities regularly review and improve implementation of their systems for keeping children safe

Recommendation #16	Priority 3
Criterion 9.1 - The entity regularly reviews and improves child safeguarding practices	

Details of finding	The Diocese will be using the results of this audit to populate a Safeguarding Implementation Plan and have already committed resources to do this. In addition, the Diocese currently checks on compliance with safeguarding requirements during visits by the Safeguarding Officer which are aligned with the Bishop's parish visits - roughly 10 parishes a year are visited. We note that these visits will be complemented by a formal self-audit program which will be developed as part of the Safeguarding Implementation Plan.
Recommendation	A Safeguarding Implementation Plan should be developed and actioned, with target dates identified and monitored.
Agreed Action	The Diocese will develop a Safeguarding Implementation Plan, including actions and target dates arising from the CPSL audit.
Responsibility	Coordinator for Professional Standards reporting to the Diocesan Professional Standards Consultative Panel
Due date	30 September 2019

Appendix A

The compliance assessment of the entity's performance against each indicator will be determined using a four-point scale, as follows:

	General	Processes	People/Resources
Not Addressed	• 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.	• Processes are non-existent. • Processes exist however the specific requirements of the indicator have not been addressed.	• No resources have been assigned.

Initial/Ad-Hoc	• The entity has commenced to address the indicator, however processes are ad-hoc or are applied on a case-by-case basis.	• Some relevant processes have been implemented which align with the requirements of the indicator, however they are:
		  • siloed; and/or
		  • undocumented; and/or
		  • inconsistent; and/or
		  • lack clarity.
			• Capabilities vary across the entity.
			• Resources are not formally assigned.

Defined and Developed	• The entity has addressed the indicator and is in the process of implementing the requirements across the entity.	• Relevant processes have been defined and developed, however are yet to be rolled out across the full operations of the entity.	• 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	• The entity has demonstrated that indicator requirements are formally embedded and are operating effectively and continuously.	• Relevant processes are integrated and coordinated, including remote operations and activities.	• Personnel have been trained to detect and report on deviations or break downs in processes. • Resources have been assigned to monitor and address non-compliance.

Appendix B

The following priority ratings have been used to assess findings arising from this audit:

Priority 1	Priority 2	Priority 3
Gaps or control weaknesses have been identified resulting in non-compliance with the indicator.	Progress has been made with respect to implementation of the required indicator, however full compliance is yet to be achieved.	Issues have been identified which represent minor procedural weaknesses or improvement opportunities with respect to the operation of the indicator.
Mitigation actions are required to be developed and initiated as soon as practicable but no later than 30 days from the issuance of this report, with expected resolution within 3 months.	Mitigation actions are required to be developed and initiated within 3 months or earlier from the issuance of this report, with expected resolution within 6-9 months.	Expected resolution is within 12 months or earlier from the issuance of this report.

Appendix C

The following parishes were visited during this audit:

Ballarat Cathedral Parish	Western Border Parish
Redan Parish	East Wimmera Parish
Warrnambool Parish	Maryborough Parish
Warrnambool West Parish	Hopetoun Parish
Camperdown Parish	Warracknabeal Parish
Timboon Parish	

Appendix D

The definitions for terms used in the National Catholic Safeguarding Standards take into account Australian state, territory and federal laws and relevant regulations, canon law, information from the Holy See, the Royal Commission into Institutional Responses to Child Sexual Abuse, the National Principles for Child Safe Organisations and the Glossary on Sexual Exploitation and Abuse published by the United Nations in 2017.

The glossary does not have any legal force and is meant only to serve as a reference tool for the National Catholic Safeguarding Standards. All terms and definitions are to be read in the context of these Standards alone.

Accessible language	means information is provided in multiple formats for individuals with different levels of English literacy and proficiency, modes of communication, languages and cognitive abilities.
Allegation	means a complaint, still to be verified, claiming or asserting that someone has committed an act of abuse against a child. The term is used interchangeably and in combination with "complaint".
Australian Catholic Bishops Conference	means the national episcopal conference of the Catholic bishops of Australia. It is the instrumentality used by the Australian Catholic bishops to act nationally and address issues of national significance.
Bishop	means a diocesan bishop and archbishop and the ordinary of an ordinariate in the Latin Church and an eparch in the Eastern Churches.
Canon law	means the revised Code of Canon Law promulgated by His Holiness Pope John Paul II in 1983 and the Code of Canons of the Eastern Churches as promulgated in 1990 and any other universal or particular legislation promulgated by the competent ecclesiastical authority.
Canonical Steward	means the person(s) or other entity canonically responsible for the Catholic Entity.
Catholic Religious Australia	means the public name of the Australian Conference of Leaders of Religious Institutes (ACLRI). It is the peak body for leaders of Religious Institutes and Societies of Apostolic Life resident in Australia.
Child/ren	means individuals under 18 years of age.
Child abuse	there are different legal definitions of child abuse in Australia. Most commonly, the categories of child abuse include sexual, physical, psychological, neglect, ill-treatment, exploitation and exposure to family violence. The following provides general definitions only. For specific legal definitions related to your state or territory please go to: https://aifs.gov.au/cfca/publications/reportingabuse-and-neglect Child abuse, when referenced throughout the National Catholic Safeguarding Standards, includes: • physical abuse refers to any non-accidental physically aggressive act towards a child. Physical abuse may be intentional or may be the inadvertent result of physical punishment. Physically abusive behaviours include shoving, hitting, slapping, shaking, throwing, punching, biting, burning and kicking; • sexual abuse refers to a person who uses power, force or authority to involve a child or young person in any form of unwanted or illegal sexual activity. This can involve touching or no contact at all. This may take the form of taking sexually explicit photographs or videos of children, forcing children to watch or take part in sexual acts and forcing or coercing children to have sex or engage in sexual acts with other children or adults;

	• neglect refers to a failure by a caregiver to provide the basic requirements for meeting the physical and emotional developmental needs of a child. Physically neglectful behaviours include a failure to provide adequate food, shelter, clothing, supervision, hygiene or medical attention; • psychological abuse refers to inappropriate verbal or symbolic acts and a failure to provide adequate non-physical nurture or emotional availability. Psychologically abusive behaviours include rejecting, ignoring, isolating, terrorising, corrupting, verbal abuse and belittlement; • exposure to family violence is generally considered to be a form of psychologically abusive behaviour, where a child is present (hearing or seeing) while a parent or sibling is subjected to physical abuse, sexual abuse or psychological maltreatment, or is visually exposed to the damage caused to persons or property by a family member's violent behaviour; and • grooming refers to a pattern of behaviour aimed at engaging a child as a precursor to sexual abuse. It includes establishing a 'special' friendship/ relationship with the child. Grooming can include the conditioning of parents and other adults to think that the relationship with the child is 'normal' and positive. The process can take as little as a few days or as long as months or even years.
Child Safeguarding Commitment Statement	means a commitment statement describing an entity's commitment to keep children safe from harm. It informs the entity's culture with respect to child safeguarding.
Child safeguarding policies and procedures	means any policies or procedures of the entity that address elements of child safety. For example, but not limited to: • recruitment; • risk management; • complaints handling; and • acceptable use (information and communication technology).
Church Authority	means: 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.
Civic engagement	means individual and collective actions designed to identify and address issues of public concern. Civic engagement includes citizens working together to make a change or difference in the community. The goal of civic engagement is to address public concerns and promote the quality of the community.
Clergy	means the body of those ordained in sacred ministry in the Church. They are either deacons, priests or bishops.
Cleric	means a member of the clergy.
Clericalist/ism	means an attitude toward clergy/religious characterised by an excessive deference and an assumption of their moral superiority. Pope Francis has said of clericalism that it occurs when "clerics feel they are superior, [and when] they are far from the people." He goes on to say that clericalism can be "fostered by priests themselves or by lay persons". When fostered by priests it may be demonstrated in an attitude where clerics see themselves as self-sufficient, superior to and separate from accountabilities of the world beyond the Church. When fostered by lay people it may be demonstrated by thinking that their contributions to the life of the Church are second-rate, or that in all things, surely 'Father knows best'.

	The features of clericalism are not restricted to the ordained (clergy and religious) nor to the Church alone. Abuse of an individual's function, role or power could be considered clericalist and could be exemplified through other attitudes such as not allowing criticism, being didactic rather than dialogical and being controlling rather than caring. It exists in hierarchical institutions such as academia, legal and medical establishments, the police and the military.
Complainant	means any person who makes a complaint that may include any allegation, suspicion, concern, or report of a breach of the entity's code of conduct. It also includes disclosures made to an institution that may be about, or relate to, abuse in the entity's context.
Conflicts of interest	means situations where a conflict arises between a person's official duties and their private interests, which could influence the performance of those official duties. Such conflict generally involves opposing principles or incompatible wishes or needs.
Cultural safety	means an environment that is safe for people of all ethnicities and cultural identities: where there is no assault, challenge or denial of their identity, of who they are and what they need. It is about shared respect, shared meaning, shared knowledge and experience, of learning, living and working together with dignity and truly listening.
Dicastery	means departments of the Roman Curia, including the Secretariat of State, congregations, tribunals, councils and offices.
Diocese	means ecclesiastical jurisdiction under the leadership of a bishop or an archbishop. In this document it is used as an inclusive term, including eparchies, ordinariates and personal prelatures.
Entity	means an entity that has been identified as Catholic by a competent authority within the Catholic Church.
Eparchy	means a term used by the Eastern Catholic Churches to denote ecclesiastical jurisdictions under the leadership of a bishop or an archbishop (also called an eparch or an archeparch).
Exposure to family violence	refer to 'child abuse'.
Formation/formation program	means a program preparing individuals for ordination or profession of vows as well as a life-long journey to the invitation of Christ to proclaim and live the Gospel message within the life of the Church.
Grooming/grooming behaviour	refer to 'child abuse'.
Institutional abuse	means, in the formal setting of an institution, child abuse could be caused by factors such as: • a "closed" culture within an organisation where transparency is discouraged; • failure to properly check the backgrounds and interview staff; • inadequate training of staff; • lack of child protection policies; • lack of support of staff by management; • poor communication skills; and/or • poor supervision of staff and children.
Lay/lay person	means members of the Catholic Church other than bishops, priests, deacons and religious.
Leaders	means personnel who are responsible for important governance decisions within a Church entity and/or who lead and coordinate Church improvement initiatives.

Leaders of Religious Institutes	means the person acting in that canonical role (by whatever name) from time to time.
Mentor	means an experienced and trusted advisor or a person who gives a younger or less experienced person help and advice over a period of time.
Ministerial PJP	means a public juridic person established by a religious institute which provides sponsorship and lay leadership for ministries of the religious institute, to ensure their continuation as works of the Catholic Church. The establishing authority for these entities is varied – some ministerial PJPs have been established by the Holy See through the Congregation for Institutes of Consecrated Life and Societies of Apostolic Life and are known as PJPs of pontifical right, others have been authorised by diocesan or provincial bishops. Canon law defines a public juridic person (PJP) as 'an aggregate of persons or things constituted by the competent ecclesial authority to fulfil a proper function given them in view of the common good' [Can. 114 §1].
Ministry	means any activity within, or delivered by, an entity that is designed to carry out the good works of the Catholic Church.
Neglect	refer to 'child abuse'.
Offender	means a person who has admitted abuse or whose responsibility for abuse has been determined by a court of law (criminal or civil), statutory or Church procedure.
Ordinariate	means a non-geographical diocese, an example of which is the Catholic Military Ordinariate of Australia which is administered by a bishop with the faculties of an Ordinary and thus this organisation is known by the term ordinariate.
Overseas clergy and religious	means any cleric or member of a religious institute who is specifically recruited from overseas by a Church Authority or entity.
Personal prelature	means a canonical structure of the Catholic Church which comprises a prelate, clergy and laity who undertake specific pastoral activities. The first personal prelature is Opus Dei.
Personnel	means a cleric, member of a religious institute or other person who is employed by the entity or engaged on a contract, subcontract, voluntary or unpaid basis.
Physical abuse	refer to 'child abuse'.
Position description	means a document which details the role, responsibilities and expectations of a role within an entity and outlines reporting lines.
Professional/pastoral supervision	means a forum for reflection and learning, an interactive dialogue between at least two people, one of whom is professionally trained as a supervisor. The dialogue shapes a process of review, reflection, critique and replenishment for personnel. Supervision is a professional activity in which personnel are engaged regardless of experience or qualification. Supervision assists personnel in their accountabilities for professional standards (including in relation to maintenance of professional boundaries), defined competencies for their role and understanding and implementation of organisational policy and procedures. For clerics and religious, professional/pastoral supervision assists in the maintenance of boundaries of the pastoral relationship and enhances the quality of their ministry. A cleric/ religious' commitment to conscious and critical reflection on their ministry and ministry experiences is recognised as being important for the wellbeing of the cleric/religious, the people with whom they exercise ministry, the wider Church and the community.

Protective behaviours program	means an age-appropriate structured education program to equip children and young people with the skills and knowledge to enhance their personal safety.
Psychological abuse	refer to 'child abuse'. Religious Institute means an institute of consecrated life, a secular institute or society of apostolic life, and their provinces or equivalent.
Respondent	means a person against whom a complaint is made.
Safeguarding	means measures to protect the safety, human rights and well-being of individuals, which allow people – in this context children – to live free from abuse, harm and neglect.
Safeguarding Committee	means a committee established to advise and support the Church Authority on all matters relating to safeguarding, including the development and implementation of a Safeguarding Implementation Plan and coordination of annual self-audits at a local level. Committee members need relevant and varied professional expertise in relation to, but not limited to safeguarding, child protection, organisational culture and structure, policy development, and need to include lay women and men.
Safeguarding Co-ordinator	means an individual who champions safeguarding and co-ordinates the implementation of the National Catholic Safeguarding Standards within an entity.
Safeguarding Implementation Plan	means a documented plan which articulates actions to be taken across the entity to ensure safeguarding practices are in place. It includes actions, strategies, responsibilities and delegations and tracks review and progress. It is overseen by the Safeguarding Committee.
Seminary	means a centre for the formation and education of students preparing for ordination.
Sexual abuse	refer to 'child abuse'.
Spiritual abuse	means the abuse of a child that is perpetrated by an individual in a position of authority and trust within the Church, supposedly in the name of God. It can cause a child to have lifelong loss of faith and/or feel distanced from the Church.
Substantiated complaint	means allegations proven to be true or supported with evidence.
Third parties	means any individual, group or organisation outside the entity who either contract services and facilities to or from the entity. For example, groups hiring Church facilities for private or public use (for example birthday parties, men's sheds, exercise groups), companies contracted to provide design and print work for an entity, and consultants.
Working with children check	means generic term used in the Standards to denote the statutory screening requirement for people who work or volunteer in child-related work. There is no single national framework setting out requirements for 'working with children' checks. Each state or territory in Australia has its own name, procedures and differences in scope regarding what this type of check entails. They are one part of a Church entity's recruitment, selection and screening processes.