Diocese of Sale

Safeguarding Audit Report
October 2024

National Catholic
Safeguarding Standards

Report prepared by:

ACSL
AUSTRALIAN CATHOLIC SAFEGUARDING LTD

A safe Church for everyone

Australian Catholic Safeguarding 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.

Australian Catholic Safeguarding Ltd is committed to fostering a culture of safety and care for children, and adults at risk.

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Foreword

Safeguarding certification by ACSL is an independent recognition that a religious entity and its ministries meet the requirements of the National Catholic Safeguarding Standards. Certification achievement is measured against the National Catholic Safeguarding Standards set by the Australian Catholic Bishops Conference as the minimum benchmark for providing a safe Church for everyone. Compliance with the Standards is demonstrated through an independent assessment.

NCSS Certification:

- Provides independent recognition that the religious entity is committed to safeguarding
- Fosters a culture of quality and continuous improvement
- Reduces and mitigates safeguarding risks
- Provides the community with confidence that the Church is taking action to address past abuse
- Fosters a systematic approach to safeguarding quality and performance
- Increases capability and safeguarding capacity
- Complies with regulatory requirements, and, where relevant, established canonical requirements.

The following report is based on an independent assessment of the Diocese of Sale's performance against the National Catholic Safeguarding Standards. The report includes compliance level ratings for each standard, criteria, and indicator, and includes explanatory notes for key findings.

The information contained in this report is based on evidence provided by the Diocese of Sale and its representatives at the time of the assessment and where applicable any further subsequent information the Diocese has supplied through the reporting process.

Certification issued by ACSL and/or its accredited auditors relates to safeguarding practices. It does not guarantee the safety, quality or acceptability of a participating organisation, its services or programs, or that legislative and funding requirements are being, or will be, met for other purposes.

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1. Executive Summary

1.1 Context

Australian Catholic Safeguarding Ltd (**ACSL**) was established in 2020, to bring together the work of Catholic Professional Standards Ltd, the Australian Catholic Centre for Professional Standards and the Australian Catholic Ministry Register. ACSL is a company limited by guarantee, whose membership is composed of the Australian Catholic Bishops Conference, Catholic Religious Australia, and the Association of Ministerial Public Juridic Persons.

ACSL is committed to fostering a nationally consistent culture of safety and care throughout the Catholic Church in Australia. This includes providing a range of services to support the implementation of the National Catholic Safeguarding Standards (**NCSS**), a framework for the protection and care of children and adults at risk. ACSL maintains the NCSS, undertakes audits and reviews of Church entities, and publishes reports which demonstrate a Church entity's commitment to the NCSS.

ACSL's core values are courage, compassion, and honesty. These values guide the way we work and inform cultural change within the Catholic Church and the wider community. We take our duty to care for and protect all children and adults at risk seriously and have zero tolerance for abuse of any kind.

The Australian Human Rights Commission released the National Principles for Child Safe Organisations (the **National Principles**). The National Principles are derived from the Child Safe Standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse (the **Royal Commission**) which relate specifically to child safety. The Office of the Children's Guardian considers that organisations in NSW that are implementing the National Principles will be simultaneously implementing the Child Safe Standards.

The Standards hold the Catholic Church to the highest degree of accountability, transparency, integrity and professionalism, in light of its mission and the pastoral responsibilities of the Church to address the failures uncovered through the Royal Commission. In some areas they exceed current regulatory and legislative requirements, in response to specific Royal Commission recommendations to the Catholic Church. In other areas, they outline expectations where there is currently no regulation. Further, The Standards now incorporate the concept of safeguarding adults, in keeping with the findings of the Royal Commission into Aged Care Quality and Safety and initial learnings from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. For more information about the NCSS please see: National Catholic Safeguarding Standards - Australian Catholic Safeguarding Ltd (acsltd.org.au).

This audit report includes the results of the assessment against the NCSS for the Diocese of Sale.

1.2 Background

The Diocese of Sale is in the Gippsland region in the south-eastern part of Victoria with the rural city of Sale being the Cathedral centre. The Diocese stretches from the outer Melbourne suburbs of Narre Warren, Berwick and Cranbourne in the west to the NSW border in the east.

The southern boundary of the diocese follows the Gippsland coast from Phillip Island in the west to the border near Mallacoota in the east. Mainland Australia's southernmost point Wilson's Promontory and the famous Ninety Mile Beach form part of this boundary.

To the north the boundary skirts the Dandenong Ranges and roughly follows the top of the Great Dividing Range before crossing over to include the small communities of Benambra and Omeo and then meeting the NSW border and following it to the sea.

Most of the northern and eastern part of the diocese comprises mountains and forests with the remainder being cleared agricultural land interspersed along its two main highways by a succession of towns.

The Diocese of Sale has been assessed by ACSL as a Church entity needing to undertake the full NCSS audit. There are 10 NCSS Standards, 48 NCSS Criteria and 104 NCSS Indicators that apply to full audit entities. For further details of the risk-based audit framework, refer to the ACSL website.

There are 27 parishes within the Diocese with several of these being parishes which share administration services and/or a parish priest. The Diocese is also home to 47 clergy. Within the Diocese, there are around 10,279 students spread across 38 Catholic primary schools. In addition, there are 9,306 students spread attending 7 Catholic secondary colleges. The Bishop of Sale is a Trustee of the Regional Seminary, Corpus Christi College, and Catholic Theological College which are not included in the scope of this audit.

Our assessment of the Diocese of Sale compliance with the NCSS indicators is detailed in Section 5 of this report. Our recommendations for improvement, including the Diocese of Sale's management responses, are included in Section 6 of this report.

The full audit report is also publicly available on the Publications and Reports page of the ACSL website.

1.3   Audit Approach

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

The audit processes we have undertaken are intended to provide reasonable assurance that safeguarding controls have been designed appropriately and are operating effectively. Therefore, this report provides a point-in-time assessment of the safeguarding practices implemented by the Diocese of Sale and the extent to which they meet the requirements of the NCSS.

This audit was conducted by Australian Catholic Safeguarding Limited.

1.4   In scope assessment

The Diocese of Sale was assessed against Edition 2 of the NCSS, covering both children and adults at risk. In August 2024, ACSL completed a desktop review of the Diocese of Sale's NCSS Self-Assessment, which provided the Diocese with an opportunity to present their evidence of their congruency with the NCSS. Fieldwork was conducted from 17 to 20 September. 7 parishes (25% of the Diocese's total parishes) were chosen for visits by ACSL as part of the audit process. This report was completed in October 2024.

As part of this audit, ACSL also engaged with key personnel at the Office of the Diocese, the Safeguarding Program and the Professional Standards Office. The activities of the Diocese of Sale Catholic Education Limited (DOSCEL) are subject to existing regulatory requirements and external accreditations. Nonetheless, the audit team met with key representatives to discuss their safeguarding practices. Under the ACSL audit framework, representatives from these entities were interviewed to assess the implementation of their safeguarding practices.

The audit scope included:

- Audit activities at the Diocesan administrative centre.
- Interviews, observations, and enquiry with the Diocesan leadership, including their Safeguarding Program and relevant ministerial and agency personnel.
- A review of their intranet, focusing on key safeguarding documents, policies, and procedures.
- Assessment of the design and testing of the operation of safeguarding controls implemented by the Diocese.
- Site visits to:

- o St Josephs, Warragul; St. Mary's Cathedral, Sale; Parishes in Partnership – St Joseph's Korumburra & St Lawrence's Leongatha; St Thomas the Apostle Parish, Clyde North; St John the Baptist, Koo Wee Rup & St Mary's Lang Lang in the Parish of Koo Wee Rup; St Agatha's Parish, Cranbourne; Our Lady Help of Christians, Narre Warren and St Michael's, Berwick.
- Interviews with over 50 personnel – inclusive of clergy, people in paid roles, volunteers, and parishioners.
- The audit team met with key leaders in the Diocese of Sale Catholic Education Ltd (DOSCEL) to understand their safeguarding policies, procedures and processes. DOSCEL are accredited under the Victorian Government Child Safe Standards and our interviews with personnel reveal DOSCEL hold the care, safety and wellbeing of children as a fundamental responsibility.

1.5   Disclaimer

The information contained in this report is based on evidence provided by the Diocese of Sale and its representatives at the time of the assessment and, where applicable, any subsequent information the Diocese of Sale has supplied through the reporting process.

Certification issued by ACSL and/or its accredited auditors does not guarantee the safety, quality or acceptability of a participating organisations, its services or programs, or that legislative and funding requirements are being, or will be, met.

Signed:

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Dr Ursula Stephens
Chief Executive Officer
Australian Catholic Safeguarding Ltd

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Dr David Treanor
Director, Safeguarding and Compliance
Australian Catholic Safeguarding Ltd

2. Overall Audit Findings

The NCSS assessment of the Diocese of Sale indicates that the Diocese of Sale is successfully implementing and embedding a culture of safeguarding throughout its organisation.

ACSL's audit methodology, developed for the Church by KPMG, uses a four-point maturity scale to assess the implementation of NCSS by a Church entity[1]. This maturity scale provides a more granular analysis than mere compliance and provides for a program of continuous improvement.

The Catholic Diocese of Sale provided ACSL with copies of their policies and procedures through the NCSS Self-Assessment Portal. The parishes and ministries that were included in the audit scope (see page 6) also completed a self-assessment of their safeguarding practices in the NCSS Self-Assessment Portal. ACSL reviewed these self-assessments, in addition to the Diocesan and parish websites. The audit teams visited the Diocese's office, ministries and parishes where they provided additional evidence and essential clarification of information supplied for each NCSS indicator. Subsequently, the Diocese provided further evidence to the audit team, after the fieldwork, to clarify statements and questions.

ACSL uses standard sampling processes that are normative practices of all audit methodologies. The findings, recommendations and management actions in this report should be interpreted in this manner –specific findings relate to the ministries and activities of the Diocese which were included in the audit scope and as such may not be generalised throughout the Diocese.

The safeguarding system adopted by the Diocese follows a centralised model of governance. Standards, policies, procedures and documents are created by the Professional Standards Committee; with advice and best practices provided and promoted by safeguarding personnel from this central function. The culture between central function and local entities is collaborative: collegiate leadership has contributed to seamless integration of policies, procedures and practices. The parishes, ministries and agencies are supported in their implementation and adoption of safeguarding but are ultimately responsible for their own governance, and particularly for risk management.

This report evaluates the adoption and implementation of the National Catholic Safeguarding Standards across the entire Diocese including the central function, ministries, and parishes. In Section 5, the overall assessment of each indicator is a collated evaluation of all Diocese component entities against the Compliance Assessment Scale described in Appendix A.

Our assessment indicates that the Catholic Diocese of Sale has fully implemented or has progressed in the implementation of 100% of the relevant indicators to their operations. Assessment for each maturity scale is as follows:

- 81 indicators are developed and embedded.
- 17 indicators are substantially progressed.

Of the 104 NCSS indicators applicable to full audited Church entities, 6 of these are not relevant to the Diocese's operations. These non-relevant indicators relate to operations in countries outside of Australia, and the seminary recruitment and formation processes, which were excluded from the scope of this audit.

Table 1: Summary of NCSS Assessment

Table 1 shows the overall assessment for each of the Standards.

Audit recommendations are classified according to priority and urgency for remediation.1F[2]

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[1] Refer Appendix A for definitions of the maturity scale used for the Compliance Assessment.
[2] Refer Appendix B for definitions of the Priority ratings used for audit recommendations.

- There are 6 Priority 2 (medium rated) recommendations.
- There are 3 Priority 3 (low rated) recommendations.

The key audit observations are summarised in Section 3. The Assessment of Compliance with NCSS indicators is detailed in Section 5 of this report.

We would like to thank the leadership team of the Catholic Diocese of Sale and all personnel who were involved in the audit for their cooperation and assistance.

National Catholic Safeguarding Standard	# NCSS indicators	Not Relevant	Assessment of Implementation			
			Developed & Embedded	Developed	Developing	Yet to Develop
1: Committed leadership, governance & culture	17	1	14	2	-	-
2: Children and adults are safe, informed and participate	6	-	3	3	-	-
3: Partnering with families, carers and communities	6	-	4	2	-	-
4: Equity is promoted, and diversity is respected	4	-	3	1	-	-
5: Robust human resource management	22	4	17	1	-	-
6: Effective complaints management	19	-	17	2	-	-
7: Ongoing training & education	11	-	8	3	-	-
8: Safe physical and online environments	7	-	6	1	-	-
9: Continuous improvement	6	1	3	2	-	-
10: Policies and procedures support the safety of children and adults	6	-	6	-	-	-
TOTAL	104	6	81	17	-	-
	98		100%			-

3.   Summary of Recommendations

Based on these detailed observations, the ACSL audit team make the following strategic recommendations to the Diocese safeguarding leadership team. These recommendations are grouped by NCSS Capability Area; the specific audit findings are listed by NCSS Standard in Section 4.

Capability Area: Leadership, monitoring and improvement (Standards 1 and 9)

NCSS Standards 1 and 9 are focused leadership, monitoring and improvement; the recommendations below are designed to further assist the Diocese's safeguarding functions through continuous improvement, moving specific systems and processes from satisfactory to excellent.

Standard 1: The Code of Conduct is due to be reviewed in 2024 and at this time ACSL recommends that it is updated to articulate that it applies to all personnel (clergy, people in paid roles and volunteers). *Agreed Action:*	**Priority 2**
Standard 1: The Diocesan integration of PACEM record management system could hold open the option to support all parishes, ministries and agencies to fulfill their obligations on information sharing and record management for safeguarding and professional standards. *Agreed Action*:	
Standard 9: The Diocese would benefit from developing an overall risk management plan that incorporates the risks identified through parishes and ministries. *Agreed Action:*	**Priority 2**

Capability Area: Engaging with children, adults, families and communities (Standards 2, 3 and 4)

NCSS Standards 2, 3 & 4 are focused on empowering children and adults to have a say in decisions that affect them as this is an integral element of a safe Church for everyone. The recommendations below are designed to further assist the Diocese in connecting with families, carers and communities, articulating decision-making process, recognising people's diverse needs and circumstances and building a safeguarding culture where ministries and activities are provided in culturally safe and inclusive ways that facilitate self-determinisation.

Standard 2: The Diocese engages more informally than formally with adults at risks in relation to feedback on decisions which affect them and make them feel safe in ministries. Whilst the Diocese has developed some information about safe and respectful relationships for adults at risk, this could be extended to other parishioners across the Diocese. Further, more generic and age-appropriate information could be provided about abuse prevention programs in public areas. *Agreed Action:*	
Standard 3: The Diocese could encourage parents, carers and/or guardians to take a greater active role in safeguarding and promoting it is everyone's responsibility. In addition,	

parishes and ministries make greater use of national and international themed days (for older people, migrants, refuges, people with disabilities, etc.) to highlight the safeguarding needs of such people. *Agreed Action:*	**Priority 3**
Standard 4: During the course of the interviews, some personnel interviewed suggested the Diocese could provide additional safeguarding materials that promote inclusion, that are culturally safe and accessible. *Agreed Action:*	

Capability Area: Right people, right role, right knowledge (Standards 5 and 7)

NCSS Standards 5 and 7 are focused on people; the recommendations below are designed to ensure the Diocese continues to have the right people in the right roles with the right knowledge.

Standard 5: ACSL notes the importance given to pastoral supervision to clergy and noted that whilst supervision is in place for most personnel, this could be extended further to all personnel. Additionally, annual appraisals need to include a safeguarding dimension. *Agreed Action:*	**Priority 2**
Standard 7: The Diocese recognise they will need to regularly update their safeguarding training to ensure it remains current and relevant. *Agreed Action:*	**Priority 2**

Capability Area: Systems, Policies and Procedures (Standards 6, 8 and 10)

NCSS Standards 6, 8 and 10 are focused on how the Diocese ensures its safeguarding processes are cohesive; the recommendations below are designed to ensure the systems, policies and procedures are effectively working in practice.

Standard 6: The Conflict of Interest policy needs to clearly articulate the process it will use to manage any potential conflict of interests. *Agreed Action:* *Standard 8: The confessional spaces either need to be adapted or changed location for the administration of the sacrament to adults.* *Date:*	**Priority 2**

4.   Audit observations

NCSS Standard 1 – Committed leadership, governance, and culture.

The safeguarding of children and adults is embedded in the entity's leadership, governance and culture.

Based on the audit findings the Diocese of Sale has developed and embedded 14 and developed 2 of the 16 indicators for this standard.

This Standard focuses on how leadership influences a positive safeguarding culture. Strong leadership includes an accountable and transparent governance structure and acknowledges that specific groups of people are at increased risk of experiencing abuse and the entity requires heightened awareness of the situations that make these groups more vulnerable.

Assessment of the requirements of this Standard 1 indicate that there is committed leadership in the governance and culture of the Diocese to embed a safeguarding culture across parishes, entities, and ministries. Diocesan personnel consistently provided feedback to the audit team that the Bishop and the Professional Standards team demonstrated leadership and transparent safeguarding governance practices.

 OBSERVATIONS

- The Diocese of Sale is clear in its intent to take a zero-tolerance to abuse.
- The Diocese has invested resources and provides centralised safeguarding resources, safeguarding support and advice to parishes and ministries.
- The Diocese has an approved Safeguarding Policy and Safeguarding Commitment Statement which is publicly available.
- The Diocese has a Code of Conduct which is designed for employees, religious and volunteers. This Code sets clear behavioural standards towards children and adults at risk and is available in multiple languages.
- There are transparent and accountable governance arrangements in place to facilitate the implementation of the safeguarding framework across the Diocese.
- The personnel interviewed, and ministries and parishes visited, demonstrate a culture of safeguarding children and adults, by championing and modelling sound practices, procedures, and language.
- The fieldwork investigation revealed that safeguarding practices are developed and embedded in most parishes and ministries, while in others that work is still developing.
- All parishes and ministries have a focus on safeguarding in their leadership structures.
- Personnel have a good understanding of record-keeping processes for safeguarding and know to contact for support.
- All parishes and ministries visited demonstrated a level of maturity around risk management.

OPPORTUNITIES FOR IMPROVEMENT

- Parish and ministry risk management plans and registers could be sent to the Diocese via the safeguarding personnel to maintain an overall Diocesan Risk Management Register.
- Many parishes had excellent risk assessment recording systems in place which could be shared across the Diocese.

- The Code of Conduct is due for review this year and ACSL recommends that it is updated to include people who might be homeless or are in out-of-home care. In addition, the Code does not specifically state it applies to everyone and we recommend this is clarified in the revision.

NCSS Standard 2 – Children and adults are safe, informed and participate.

Children and adults are informed about their rights, participate in decisions affecting them and are taken seriously.

Based on the audit findings the Diocese of Sale has developed and embedded 3 and developed 3 of the 6 indicators for this standard.

Standard 2 embeds the rights of children and adults through empowerment and participation. It outlines the importance of providing them with information and opportunities to participate and emphasises the responsibility of the Diocese of Sale to provide access to this information. ACSL commenced auditing Church entities' safeguarding practices for adults at risk from July 2024 and it is to be expected that the Diocese of Sale have yet to embed safeguarding practices for adults at risk across all their parishes and ministries.

The Diocese has demonstrated significant efforts to be inclusive and engage children. The audit team made the following key observations.

OBSERVATIONS

- The Diocese has produced a range of materials to help make children, their families, and carers aware of their rights to be safe from abuse and who to contact if they are concerned about their safety. This information is usually displayed in public areas in the parishes and ministries.
- Most parishes have at least two safeguarding contact persons.

OPPORTUNITIES FOR IMPROVEMENT

- ACSL recommends that material for programs supporting adults who may be at risk be widely displayed (e.g. Elder Abuse hotline, family violence support).
- Parishes and ministries continue, as part of the normal activities, to provide a range of feedback options and respond to any suggestions for improvements or areas of concern.
- Videos could be developed by parishioners in key community languages to promote safeguarding messages and practices.

NCSS Standard 3 – Partnering with families, carers, and communities.

Families, carers and communities are informed and involved in promoting the safeguarding of children and adults.

Based on the audit findings, the Diocese of Sale have developed and embedded 4 and developed 2 the 6 indicators for this standard.

Standard 3 is aimed at understanding how well safeguarding is embedded across all Diocesan activities and operations. Safeguarding is most effective when an inclusive approach is taken that actively encourages the participation and involvement of families and carers.

OBSERVATIONS

- The current consultation process initiated by the Diocese of Sale is inclusive and widely valued by the people who participated in the audit process.

- The Diocese of Sale has a long history of participating in community awareness programs including National Child Protection Week, Safeguarding Sunday and NAIDOC week.
- Parishes and Parish Councils have consulted with families and use regular feedback and experiences in analysing and refine Diocesan safeguarding materials.

OPPORTUNITIES FOR IMPROVEMENT

- The Diocesan safeguarding personnel will offer safeguarding engagement strategies for adults at risk which parishes and ministries can use to engage their communities. This includes training and providing "safeguarding bites" for parish newsletters with advice on issues such as welcoming new parishioners, cultural awareness, mental health and wellbeing, elder abuse.
- The Diocesan Assembly will provide new opportunities for wider engagement of parishioners, and support the development and renewal of lay ministries.

NCSS Standard 4 – Equity is promoted, and diversity is respected.

Equity is upheld and diverse needs respected in policy and practice.

Based on the audit findings the Diocese of Sale have developed and embedded 3 and developed 1 of the 4 indicators for this standard.

Every human person has inherent human dignity regardless of their personal attributes or characteristics. The purpose of Standard 4 is to acknowledge the diversity of people's needs and circumstances by building a safeguarding culture where ministries and services are provided in culturally safe ways that facilitate self-determination.

The audit team made the following key observations.

OBSERVATIONS

- The Diocese demonstrates a practical commitment to cultural diversity and inclusion.
- A pastoral approach is evident in supporting LGBTQI groups to participate and belong.
- A strong connection between parish communities and schools acknowledges the importance of valuing relationships across generations.

OPPORTUNITIES FOR IMPROVEMENT

- The Diocese will continue to foster understanding of how and when a person may become an adult at risk and effective safeguarding strategies that can be applied in these circumstances.
- ACSL suggests that parishes and ministries use other themed weeks or celebrations (e.g. carers week, senior's week, Harmony Day, International Day of Disability) to focus on the safeguarding needs of these groups.
- Where parishes are in 'high growth' population corridors, with culturally diverse congregations, the Diocese could consider appointing chaplaincies for specific groups to further nourish their faith.
- The Diocese should strengthen the Aboriginal Catholic Ministry to promote reconciliation and mutual understanding, and the pastoral care of Aboriginal and Torres Strait Islander peoples and supporting them in the living of their Faith.

NCSS Standard 5 – Robust human resource management.

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

Based on the audit findings the Diocese of Sale have developed and embedded 17 and developed 1 of the 18 indicators for this standard.

Standard 5 is focused on the personnel (clergy, staff, and volunteers) who are part of the Diocese of Sale. The Standard expects human resource management to demonstrate a commitment to implementing a zero-tolerance culture of abuse. The audit process examines how best practice standards are applied to how personnel are recruited, inducted, and supported in ministry. Personnel provided feedback to the audit team that Bishop Greg is a regular visitor to parishes and easy to approach about any matter.

OBSERVATIONS:
- A zero-tolerance to abuse approach is explicit in advertising, screening, and recruitment practices for personnel.
- Recruitment practices follow strong human resource management practices.
- The Diocese has comprehensive recruitment policies and procedures that outline safeguarding requirements in its advertising, vetting, and screening of personnel; these are available to all parishes and ministries.
- All personnel who engage with children have current WWCC checks which are monitored through several systems including a centralised and non-centralised system.
- Personnel undertake safeguarding induction prior to commencing in their roles.
- Volunteer training (induction and refresher) is the responsibility of the Diocesan safeguarding team.
- Clergy participates in supervision.
- The interviews with clergy revealed positive and appropriate interpersonal relationships in which people see themselves bonded together in community through a common mission.
- Parish and ministries arrange gatherings (at least yearly) for personnel that allow opportunities to catch up with volunteers, offer personal support and seek feedback on ministry activities.

OPPORTUNITIES FOR IMPROVEMENT
- The fieldwork interviews noted that supervision is in place for most personnel and could be extended further to everyone. Furthermore, annual appraisals need to include a safeguarding dimension.

NCSS Standard 6 – Effective complaints management

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

Based on the audit findings the Diocese of Sale have developed and embedded 17 and developed 2 of the 19 indicators for this standard.

NCSS Standard 6 requires the Church entity's complaint management processes to be clear, transparent, and easy to understand. An audit assesses both the effectiveness of the complaint management process and that the roles and responsibilities of those involved in managing the process are clear. Further, it should specify what supports will be offered to all parties to a complaint. The audit also assesses whether all personnel interviewed in the Catholic Diocese of Sale are aware of the complaint processes.

The audit focuses on reviewing current complaint management practices. This includes policies and procedures in place to prevent, detect, report, and respond to all incidents and complaints, and the associated training, awareness, and education available for all personnel. The ACSL audit does not re-assess the outcomes of individual complaints.

OBSERVATIONS

- The Diocesan Complaints Handling Policy is comprehensive.
- Safeguarding records are kept for a minimum of 50 years as documented in the Privacy Policy and implemented as a minimum standard in parishes.
- Complaint Management policies empower personnel and others to make safeguarding complaints in good faith.
- The Diocesan policies offer all parties involved who they bring forward a safeguarding complaint with appropriate support.
- Personnel interviewed advised that complaints are taken seriously and investigated promptly and thoroughly.
- Personnel commended those working in the Professional Standards team on their practical and supportive approach when complaints are brought to their attention.

OPPORTUNITIES FOR IMPROVEMENT

- ACSL recommends the use of plain language fact sheets and flowcharts in parishes and ministries.
- Roles and responsibilities are defined in the Complaint Handling Policy, however the management of Conflicts of Interest in a complaint investigation is not specifically addressed and should be included.

NCSS Standard 7 – Ongoing education and training

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

Based on the audit findings the Diocese of Sale have developed and embedded 8 and developed 3 of the 11 indicators for this standard.

NCSS Standard 7 requires the Diocese to provide ongoing education and training to equip personnel with knowledge, skills, and awareness to keep children and adults safe. The audit team made the following key observations.

OBSERVATIONS

- The Diocese recognises that specific roles within parishes and ministries require differing safeguarding training and differing support needs.
- The Diocese has a safeguarding training program (induction and refresher), which is documented, structured and comprehensive.
- Regular training focuses on safeguarding, including dimensions of the NCSS and other recognised safeguarding standards.
- Safeguarding training is subject to review to ensure it maintains its currency, relevance, and meets the needs of changing safeguarding environments, post pandemic.
- Parishes have a 'New to the Parish Booklet' which details Diocesan safeguarding processes.

OPPORTUNITIES FOR IMPROVEMENT

- Promoting greater awareness of the needs and vulnerabilities of adults at risk and how to manage these will be the focus of future training programs.
- The Diocese could highlight and celebrate the cultural practices of new arrivals from overseas, including acknowledging saints and venerable people celebrated in their countries of origin.

NCSS Standard 8 – Safe physical and online environments

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

Based on the audit findings the Diocese of Sale have developed and embedded 6 and developed 1 of the 7 indicators for this standard.

ACSL assessed how the Diocese is addressing its responsibility to minimise opportunities for abuse to occur in both physical and online environments. Standard 8 requires the Diocese and its personnel to be proactive in recognising and mitigating safeguarding risks.

The core aspects of this responsibility are the Code of Conduct, the Safeguarding Policy, and the Safeguarding Risk Management Strategy, which outline appropriate supervision, oversight of, and behaviour towards children and adults at risk. The movement of ministry, and managing risks associated with third parties or contractors and the use of facilities by others are considered.

Safeguarding in the digital environment supports requirements of the Privacy Act (1998) and cyber security obligations for individuals and organisations.

The audit team made the following key observations.

OBSERVATIONS

- The Diocese has many safeguarding tools in place to minimise opportunities for abuse to occur. Examples include clergy movement forms, sign in and sign out sheets and the detailed completing of ministry risk assessments.
- Policies around management of social media, photography and communicating appropriately to children and families are well established and understood.
- All parishes conduct the Sacrament of Reconciliation for children on the altar or in a public area.
- Most parishes visited have modified confessionals to meet safeguarding requirements; others that are unable to make such modifications have abandoned their use.
- A support template and safety plan for managing Persons of Concern within the community is available from the Diocese – this plan is modified to suit individual circumstances and could be applied to other high-risk individuals.

- The Diocese provides a third-party agreement template for parishes who rent out faciliti

OPPORTUNITIES FOR IMPROVEMENT

- There are extensive paper and electronic files held across the Diocese. Parishes and ministries would benefit from a consistent Diocesan Electronic Recordkeeping System to support consistency with Australian standards and privacy legislation.
- Continue the implementation of PACEM.
- To increase visibility and safeguarding, CCTV has been installed in many premises. Most parish personnel are not aware of the privacy and data protection requirements of using this technology.
- Develop an action plan to finalise the upgrade of confessional spaces. Continue the roll out of the PACEM system across the Diocese and investigate how it will further assist in maintaining centralised records.

NCSS Standard 9 – Continuous improvement

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

Based on the audit findings the Diocese of Sale have developed and embedded 3 and developed 2 of the 5 indicators for the Standard.

Standard 9 is focused on assessing how the Diocese is preparing to meet emerging safeguarding risks and the continuous review and improvement approaches that are in place, across its ministries and services. This Standard requires the Diocese to regularly review policies and procedures, testing how they are understood and implemented by personnel. It also requires the Diocese to review incidents and complaints to identify systemic safeguarding issues that may arise. External review mechanisms strengthen the organisation's safeguarding capabilities, support continuous improvement, and allow the learnings and good practice to be shared. The audit team made the following key observations:

OBSERVATIONS

- The Diocese has developed a series of safeguarding policies, procedures and processes that address children and adults at risk and implemented them across parishes and ministries.
- The Diocese reviews these materials regularly and provides parishes with updated information.
- The Diocesan safeguarding policies, procedures and processes are reviewed on a three-year cyclical basis.

OPPORTUNITIES FOR IMPROVEMENT

- The Diocese will continue to support parishes to implement safeguarding policies, procedures and processes through the rollout of PACEM.
- Parishes and associated ministries will provide the Diocese a copy of their risk assessment and register on a yearly basis. The Diocese will collate these to create an overall Diocesan Safeguarding Risk Management Plan.

NCSS Standard – 10 Policies and procedures support the safety of children and adults

Policies and procedures document how the entity is safe for children and adults.

Based on the audit findings the Diocese of Sale have developed and embedded 6 of the 6 indicators for this standard.

Standard 10 determines that the safeguarding policies and procedures are well documented and managed. This ensures consistent application of safeguarding practices across the Diocese. The audit expects that safeguarding policies and procedures are publicly available, in formats that are easily understood. They should be developed and reviewed in consultation with a broad range of stakeholders. Safeguarding policies and procedures should be 'living' documents.

The audit team made the following key observations:

OBSERVATIONS

- Key safeguarding policies and procedures are in place and operating effectively. The policies and procedures address legislation and the requirements of the NCSS. They are accessible to the public and are presented in child-friendly formats.
- The Bishop and other leaders champion and model best practices in safeguarding.
- Policies and documentation developed by the Diocese are distributed to ministries and parishes.
- There are processes in place to monitor and review the safeguarding policies and procedures.
- Personnel interviewed understand and appear to implement safeguarding policies and procedures.

5. Assessment of Compliance with NCSS indicators

Standard 1	Committed leadership, governance and culture

The safeguarding of children and adults is embedded in the entity's leadership, governance and culture				

Criterion 1.1 – There is a public commitment to safeguarding that takes a zero tolerance approach to abuse.	Developed & Embedded	Developed	Developing	Yet to Develop
1.1.1	The Safeguarding Policy is approved and endorsed by the Church Authority and/or relevant leadership body and is publicly available.	✓			
1.1.2	The Safeguarding Commitment Statement is published, widely displayed, and made publicly available.	✓			

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

Criterion 1.2 - A culture of safeguarding children and adults is championed and modelled at all levels of the Church Authority from the top down and bottom up.	Developed & Embedded	Developed	Developing	Yet to Develop
1.2.1	A strong safeguarding culture is created and maintained by the Church Authority and leaders by: • promoting safeguarding, and the dignity and rights of everyone. • emphasising that safeguarding children and adults is everyone's responsibility; and • actively monitoring safeguarding compliance and risk management.	✓			
1.2.2	A Safeguarding Committee is appointed at the highest level of leadership to oversee the effective ongoing implementation of safeguarding practices, policies, and procedures.	✓			
1.2.3	A Safeguarding Co-ordinator(s) is appointed with clearly defined roles and responsibilities.	✓			
1.2.4	Personnel understand that good safeguarding practices are everyone's responsibility and are empowered to contribute to the organisation's safeguarding practices.	✓			

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

Criterion 1.3 - Governance arrangements facilitate the implementation of the Safeguarding Policy across the entity's activities.	Developed & Embedded	Developed	Developing	Yet to Develop
1.3.1	Governance arrangements are transparent and include safeguarding roles and responsibilities to ensure accountability for the safeguarding of children and adults is clear.	✓			
1.3.2	Where the Church Authority's governance includes countries other than Australia, the NCSS are applied wherever possible, taking into account cultural differences and local jurisdictional issues.	Not relevant to current activities			

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

Criterion 1.4 – The entity's Code of Conduct sets clear behavioural standards towards children and adults.		Developed & Embedded	Developed	Developing	Yet to Develop
1.4.1	The Code of Conduct is explicit and inclusive of all personnel and provides guidance on appropriate and expected standards of behaviour.	✓			
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 considers the needs of all children and adults at risk, paying particular attention to: • First Nations people. • individuals who are elderly, are living with disability, are suffering from an illness, or who are at risk of abuse'; • individuals from culturally and linguistically diverse backgrounds. • children in out of home care, or are homeless; and, • children and adults of diverse sexuality.		✓		
1.4.4	The Code of Conduct outlines the importance of considering how power imbalances can occur in ministries and services.	✓			

Observations:

1.4.3 The desktop review indicates the Code of Conduct needs to be updated to articulate that it applies to all personnel participating in ministries and agencies. Refer to Recommendation #1.

Criterion 1.5 - The entity's risk management plan focuses on preventing, identifying, and mitigating safeguarding risks to children and adults.		Developed & Embedded	Developed	Developing	Yet to Develop
1.5.1	The Risk Management Plan considers the needs of children and adults with diminished capacity, and how and when adults at risk make informed choices (dignity of risk).	✓			
1.5.2	The Risk Management Plan incorporates procedures to assess, evaluate, review, and oversee safeguarding of children and adults at risk within its ministry and/or service.	✓			
1.5.3	There is a documented program to regularly identify, monitor, report, and review risks.	✓			

Observations:

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

Criterion 1.6 - Personnel understand their obligations on information sharing and record keeping for safeguarding and professional standards.		Developed & Embedded	Developed	Developing	Yet to Develop
1.6.1	Information sharing and record keeping policies and procedures are documented and communicated to personnel.	✓			
1.6.2	Information sharing and record keeping policies and procedures align with best practice.		✓		

Observations:

The Diocese is moving to a new record management system, it will be useful for the Diocese to explore the different options available to maximise best practices in record keeping. Refer Recommendation #1.

Standard 2	Children and adults are safe, informed and participate

Children and adults are informed about their rights, participate in decisions affecting them and are taken seriously

Criterion 2.1 – Children and adults at risk engaged in an entity's ministry and/or services are informed about their rights, including safety, decision making, participation and how a complaint will be managed.	Developed & Embedded	Developed	Developing	Yet to Develop
2.1.1 Age-appropriate strategies are used to engaged children, seek their views about what makes them feel safe, and enable them to participate in decisions that affect them.	✓			
2.1.2 Adults at risk (or carers where appropriate) are engaged to provide their views about decisions which affect them, what makes them feel safe and to contribute to safeguarding approaches.		✓		
2.1.3 The organisation makes children and adults at risk aware of their rights, including their right to be safe from abuse, and who to contact if they are concerned about their safety or the safety of others.	✓			

Observations:

The Diocese is yet to embed a process that will engage adults at risks feedback on decisions which affect them and make them feel safe in ministries. Refer Recommendation #2.

Criterion 2.2 - The importance of friendships is recognised and support from peers is encouraged, helping children feel safe and less isolated.	Developed & Embedded	Developed	Developing	Yet to Develop
2.2.1 Children are provided with age-appropriate information about safe and respectful peer relationships.	✓			

Observations:

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

Criterion 2.3 - The importance of friendships and social connections for adults at risk is recognised and encouraged, helping them feel safe and less isolated.	Developed & Embedded	Developed	Developing	Yet to Develop
2.3.1 Adults at risk (or their carers where appropriate), are provided with information about safe and respectful relationships.		✓		

Observations:

2.3.1 The Diocese has developed some information about safe and respectful relationships for adults at risk and this could be extended to other parishioners across the Diocese. Refer to Recommendation #2.

Criterion 2.4 – Where relevant to the setting or context, children and families are offered access to abuse prevention programs and related information that is age appropriate.	Developed & Embedded	Developed	Developing	Yet to Develop
2.4.1 Children and families are provided with information, access and/or referral to abuse prevention programs, appropriate to the child's age, development, ability, and level of understanding.		✓		

Observations:

More generic and age-appropriate information could be provided about abuse prevention programs in public areas. Refer to Recommendation #2.

Standard 3	Partnering with families, carers and communities

Families, carers and communities are informed and involved in promoting the safeguarding of children and adults.

Criterion 3.1 – Parents, carers and/or guardians participate in decisions affecting their child, or adults with diminished capacity.	Developed & Embedded	Developed	Developing	Yet to Develop
3.1.1	The entity encourages parents, carers and/or guardians to take an active role in monitoring the safety of those engaged in the ministry and/or service.		✓		

Observations

3.1.1 Fieldwork indicates that not all parishes actively remind parents, carers and/or guardians that safeguarding is a shared responsibility. Refer Recommendation #3.

Criterion 3.2 – Families, carers and communities are engaged with and are provided information about the Church Authority's approach to safeguarding.	Developed & Embedded	Developed	Developing	Yet to Develop
3.2.1	Families, carers and communities are encouraged to contribute to discussions about safeguarding approaches.	✓			
3.2.2	Safeguarding information is provided and widely available, including contact details of the Safeguarding Committee and/or Safeguarding Co-ordinators.	✓			

Observations:

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

Criterion 3.3 - Families, carers and communities are informed about the Church Authority's operations and governance; and have an opportunity to have a say in the safeguarding policies and practices.	Developed & Embedded	Developed	Developing	Yet to Develop
3.3.1	Processes are in place to engage families, carers and communities about their views on safeguarding policies and practices.	✓			
3.3.2	Families, carers and communities are aware of the roles and responsibilities of personnel providing ministries and/or services directly to children and adults at risk.	✓			

Observations:

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

Criterion 3.4 – The entity raises community awareness of the dignity and rights of all children and adults	Developed & Embedded	Developed	Developing	Yet to Develop
3.4.1	The entity promotes and/or participates in activities which raise awareness of abuse prevention and the rights and dignity of children and adults at risk.		✓		

Observations:

Parishes and ministries could focus on themed days (International Seniors Day, etc.) to promote safeguarding needs of these different groups. Refer to Recommendation #3.

Standard 4	Equity is promoted and diversity is respected

Equity is upheld and diverse needs respected in policy and practice

Criterion 4.1 - The diverse circumstances and backgrounds of children and adults at risk are acknowledged and accommodated by providing appropriate support.	Developed & Embedded	Developed	Developing	Yet to Develop
4.1.1	The Safeguarding Policy and procedures demonstrate an understanding, and awareness of the diverse circumstances and experiences that increase the risk of	✓			

		Developed & Embedded	Developed	Developing	Yet to Develop
	abuse.				
4.1.2	The Complaints Handling Policy and practices address barriers that may prevent a disclosure of abuse being made and that hinders personnel from recognising and responding appropriately.	✓			

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

Criterion 4.2 – Children and adults have access to information, support and complaints processes in ways that promote inclusion, are culturally safe, and accessible.		Developed & Embedded	Developed	Developing	Yet to Develop
4.2.1	Information about complaint processes and supports are provided in culturally safe, accessible, and easy to understand formats.		✓		

Observations:
4.2.1 Fieldwork indicates that this information could be additionally provided in more accessible and culturally safe ways. Refer to Recommendation #4.

Criterion 4.3 - The diverse needs of Aboriginal and Torres Strait Islander people, those living with disability, those from culturally and linguistically diverse backgrounds, children and adults who are unable to live at home, and those of diverse sexuality, are acknowledged.		Developed & Embedded	Developed	Developing	Yet to Develop
4.3.1	The Safeguarding Policy and procedures empower children and adults by reflecting attitudes and behaviours that respect their inherent dignity, are inclusive and are 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 and adults at risk are suitable and supported to reflect safeguarding values in practice

Criterion 5.1 – A strong commitment to safeguarding underpins an entity's recruitment.		Developed & Embedded	Developed	Developing	Yet to Develop
5.1.1	The commitment to safeguarding and a zero-tolerance approach to abuse are explicit in advertising, screening, and recruitment for personnel.	✓			
5.1.2	Recruitment and screening procedures and processes are fully documented.	✓			
5.1.3	Positions are assessed for the expected level of contact with children/adults at risk and appropriate safeguarding recruitment procedures are implemented.	✓			

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

Criterion 5.2 – Personnel have current clearances (for example, working with children checks) and/or equivalent background checks relevant to their role.		Developed & Embedded	Developed	Developing	Yet to Develop
5.2.1	All personnel are required to have a background check or	✓			

		Developed & Embedded	Developed	Developing	Yet to Develop
	clearance (as relevant to their role).				
5.2.2	As required by legislation, personnel must have a current working with children check (or working with vulnerable people check) and/or NDIS Worker Screening Check prior to working with children and adults at risk.	✓			
5.2.3	Records of all checks are maintained and monitored in accordance with legislation, for all personnel	✓			

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

Criterion 5.3 - Personnel complete appropriate induction and are aware of their safeguarding responsibilities including reporting obligations.		Developed & Embedded	Developed	Developing	Yet to Develop
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 and their leadership team undertake the National Catholic Safeguarding Standards Introductory Session for Leaders.	✓			

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

Criterion 5.4 - Ongoing supervision and people management includes an emphasis on safeguarding responsibilities.		Developed & Embedded	Developed	Developing	Yet to Develop
5.4.1	Professional supervision, mentoring, and annual performance reviews for personnel include a focus on safeguarding responsibilities.		✓		

Observations:
5.4.1 Fieldwork investigations indicate ongoing supervision and people management policies are in place, but the implementation needs additional time and resources. Refer to Recommendation #5.

Criterion 5.5 – Before and during seminary and religious formation, candidates are appropriately screened and supported, including processes for ongoing formation, support and supervision of clergy and religious.		Developed & Embedded	Developed	Developing	Yet to Develop
5.5.1	The Church Authority seeks professional support in screening candidates for seminary/formation programs and before ordination/profession of vows. This includes a responsibility to enquire if an applicant or candidate has previously withdrawn or been exited from another seminary or formation program.	✓			
5.5.2	Seminary and initial formation programs have robust screening processes for candidates for religious ministry, including external psychological and psychosexual assessments.	Not applicable			
5.5.3	Ongoing integrated formation for clergy and religious addresses both the canonical and civil safeguarding requirements. For priests, this would include supporting their fidelity to the Church's teaching regarding the Sacrament of Reconciliation and the inviolability of the Sacramental Seal.	✓			
5.5.4	All clergy and religious in full-time ministry participate in at least 6 hours, with the optimum being 10 hours of professional/pastoral supervision each year. Clergy and	✓			

		Developed & Embedded	Developed	Developing	Yet to Develop
	religious not in full-time ministry participate in 6 hours of reflective practice activities each year.				
5.5.5	All clergy and religious in ministry, undertake ongoing professional development and regular appraisals	✓			
5.5.6	All newly ordained clergy and newly professed religious are supported with a suitable mentor for at least five years post ordination or final profession.	✓			

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

Criterion 5.6 - The curriculum for seminary and formation programs for clergy and religious includes safeguarding knowledge and skills development of candidates to understand and lead initiatives for safeguarding children and adults**.**		Developed & Embedded	Developed	Developing	Yet to Develop
5.6.1	Seminary and initial formation programs build candidates' knowledge and skills in a range of areas to support safeguarding children and adults.	Not applicable			
5.6.2	Seminary and initial formation programs include developing pastoral responses to victims and survivors of abuse.	Not applicable			
5.6.3	Seminary and initial formation programs identify how to avoid abuse of power and the development and/or reinforcement of clericalist attitudes and behaviours.	Not applicable			

Observations:
N/A.

Criterion 5.7 – The movement and credentialling of those in active ministry is appropriately managed.		Developed & Embedded	Developed	Developing	Yet to Develop
5.7.1	A system to assess the safeguarding credentials and manage the movement of all seminarians, clergy, religious and lay ministries between different seminaries, formation programs and other Church entities is in place.	✓			

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

Criterion 5.8 – Where clergy and religious from countries other than Australia are recruited to ministry, programs are in place to support their cultural awareness, screening, induction, professional supervision and development.		Developed & Embedded	Developed	Developing	Yet to Develop
5.8.1	Clergy and religious from countries other than Australia recruited to ministry, are screened and verification information is sought from the international Church Authority.	✓			
5.8.2	Clergy and religious from countries other than Australia participate in a safeguarding induction program which is documented and occurs as soon as possible after commencement of ministry.	✓			
5.8.3	Clergy and religious from countries other than Australia are supported with a suitable mentor for at least the first two years of their time in Australia.	✓			

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

Standard 6	Effective complaints management

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

Criterion 6.1 - The entity's Complaints Handling Policy outlines the roles and responsibilities, approaches to dealing with different types of complaints, reporting obligations and record keeping requirements.	Developed & Embedded	Developed	Developing	Yet to Develop
6.1.1	Policies and procedures address mandatory reporting obligations.	✓			
6.1.2	There are clear procedures that provide step-by-step responses and action to be taken for different types of complaints, including: • breaches of Code of Conduct. • disclosures, allegations, or concerns of current abuse of a child. • an adult bringing forward a complaint of abuse suffered as a child; and • an adult bringing forward a complaint of current or past abuse experienced as an adult.	✓			
6.1.3	The Complaint Handling Policy outlines how perceived or actual conflict of interests are managed.		✓		
6.1.4	The Complaint Handling Policy acknowledges that power imbalances exist between the complainant and respondent and has strategies in place to address this.	✓			
6.1.5	The Complaint Handling Policy spells out who has responsibilities in relation to handling complaints and when procedures are enacted.	✓			
6.1.6	All abuse complaints, incidents, allegations, disclosures, concerns and referral are recorded, and confidential information is stored, protected and retained according to the Privacy Act, and for 50 years.	✓			

Observations:

Conflict of Interest is mentioned however there appears to be no clear procedure about how these will be managed in practice. Refer to Recommendation #6.

Criterion 6.2 - The Complaint Handling Policy is understood by children, adults, families, carers, and personnel, and focuses on the rights of children and adults at risk.	Developed & Embedded	Developed	Developing	Yet to Develop
6.2.1	The Complaint Handling Policy and procedures demonstrate how the safety and well-being of children and adults at risk are prioritised.	✓			

Observations:

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

Criterion 6.3 - Complaints are taken seriously and responded to promptly and thoroughly.	Developed & Embedded	Developed	Developing	Yet to Develop
6.3.1	The Complaints Handling Policy is aligned, and operates in conjunction, with the Code of Conduct, HR ✓ and other policies.	✓			
6.3.2	The Complaints Handling Policy commits to an initial risk	✓			

		Developed & Embedded	Developed	Developing	Yet to Develop
	assessment if a complaint of abuse is received, to identify and minimise any risk to children or adults. Ongoing risk assessments are conducted throughout investigation processes.				
6.3.3	Complainants are responded to promptly and kept informed as to the progress of dealing with their complaint.	✓			
6.3.4	Trauma-informed and victim-centred support and care is offered to any child or adult who has experienced abuse.	✓			
6.3.5	Sharing information relating to complaints adheres to the Australian Privacy Principles and relevant legislation.	✓			
6.3.6	The Complaints Handling Policy and procedures empower and support personnel to raise, in good faith, concerns and allegations about unacceptable behaviour towards children and adults by other personnel.	✓			
6.3.7	Where a complaint related to the sexual abuse of a child or adult against clergy or religious is substantiated under a civil standard, the Church Authority undertakes a risk management process to determine the appropriate action, in keeping with Church protocols.	✓			
6.3.8	Where a clergy or religious is convicted of a canonical offence relating to child sexual abuse, the respondent is to be prohibited from the exercise of ministry until such times as the process for imposing a penalty is completed by the relevant dicastery.	✓			

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

Criterion 6.4 - The Complaints Handling Policy includes the process of reporting complaints and concerns to relevant authorities, requiring cooperation with ay statutory or contractual processes.		Developed & Embedded	Developed	Developing	Yet to Develop
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 authorities, in accordance with regulations. • any concerns and/or complaints of a criminal against adults be reported to statutory authorities; and • personnel cooperate with law enforcement procedures and directives.	✓			

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

Criterion 6.5 – The Church Authority ensures mechanisms are in place to support complainants of child and adult sexual abuse.		Developed & Embedded	Developed	Developing	Yet to Develop
6.5.1	Appropriate pastoral care is provided to complainants.	✓			

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

Criterion 6.6 - The Church Authority ensures respondents facing allegations are supported and monitored.	Developed & Embedded	Developed	Developing	Yet to Develop
6.6.1 Appropriately trained personnel engaged in consultation with the respondents to counsel and represent the pastoral needs of the respondent.	✓			
6.6.2 Arrangements are in place to monitor, supervise and support a respondent, where there is a complaint, until (and if) the Church Authority no longer has this responsibility.		✓		

Observations:
There is an informal arrangement in place which needs to be formalised. Refer to Recommendation #6.

Standard 7	Ongoing education and training

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

Criterion 7.1 - Personnel are trained and supported to implement the safeguarding policies and procedures.	Developed & Embedded	Developed	Developing	Yet to Develop
7.1.1 Personnel are provided regular education and training on safeguarding policies and procedures.	✓			
7.1.2 The entity's induction and refresher Safeguarding of Children and Adults training must as a minimum cover: • Code of Conduct. • safeguarding risk management. • Safeguarding Policy and procedures. • Complaints Handling Policy and procedures. • reporting obligations; and • e-safety training.	✓			
7.1.3 Records are maintained to ensure all personnel attend induction training and participate in refresher safeguarding training at least every three years.	✓			
7.1.4 All personnel with specific safeguarding responsibilities receive ongoing support and professional development to their role.	✓			

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

Criterion 7.2 - Personnel are supported to recognise the nature and indicators of child abuse, including harmful behaviours by a child towards another child.	Developed & Embedded	Developed	Developing	Yet to Develop
7.2.1 Education and training programs include materials addressing factors that may place children at risk of abuse, building 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:
Requirements of the indicators are in place. No recommendations for improvement noted.

Criterion 7.3 – Personnel are supported to recognise the factors that contribute to adult abuse, with a focus on adults at risk.	Developed & Embedded	Developed	Developing	Yet to Develop
7.3.1	Education and training programs include materials addressing factors that may place adults at risk of abuse, building knowledge to: • understand the nature and impact of adult abuse. • understand the nature, factors, and impact of institutional abuse. • identify risk factors, such as abuse of power, and exploitation. • recognise how adults and institutions can be groomed, including power imbalances can be exploited; and • understand what could make specific adults at increased risk of abuse.		✓		

Observations:

The Diocese mentions they are completing some further work in this domain. Refer to Recommendation #7

Criterion 7.4 - Personnel have the information and skills to respond effectively to safeguarding risks, concerns, disclosures, and allegations of abuse.	Developed & Embedded	Developed	Developing	Yet to Develop
7.4.1	Education and training programs equip relevant personnel to appropriately respond to and support anyone bringing forward concerns, disclosures, and allegations of abuse.	✓			
7.4.2	Personnel receive training on information sharing and record keeping policies and procedures.	✓			
7.4.3	Personnel receive training on reporting obligations under Commonwealth/State/Territory legislative and canon law, which includes: • reporting suspected criminal behaviour to police. • mandatory reporting to child protection authorities. • Reportable Conduct Scheme. • reporting to other regulatory authorities or government departments; and • Canonical reporting requirements.	✓			

Observations:

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

Criterion 7.5 - Personnel receive training and information on how to build culturally safe environments for children and adults.	Developed & Embedded	Developed	Developing	Yet to Develop
7.5.1	Cultural safety training is provided to equip personnel to create, culturally safe environments for Aboriginal and Torres Strait Islander people.		✓		
7.5.2	Training is provided to relevant personnel to equip them with the knowledge and understanding of diverse cultural backgrounds and how to create safe environments for people from these groups.		✓		

Observations:

The Diocese mentions they are completing some further work in this domain. Refer to Recommendation #7.

Standard 8	Safe physical and online environments

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

Criterion 8.1 – The Safeguarding Risk Management Strategy addresses both physical and online risks, without compromising the individual's right to privacy or wellbeing.	Developed & Embedded	Developed	Developing	Yet to Develop
8.1.1	Both physical and online risks are addressed within the provision of ministry and/or services including risks arising from: • one-to-one interactions between an adult and a child; • ministries and/or services such as counselling, home visits, outreach, one-to-one tuition, the sacrament of reconciliation, spiritual direction and mentoring; • potential physical contact between the penitent and the confessor where the sacrament of reconciliation is celebrated; • one-to-one interaction with adults at risk; • child-to-child interactions. • adult-to-child interactions; • adult-to-adult interactions (with consideration to power imbalances); and • the nature of physical spaces. Wherever possible, these interactions are conducted in an open or visible space, or within clear line of sight of another adult.	✓			
8.1.2	The entity's policies require the safe use of online applications for children and adults to learn, communicate and seek help.	✓			
8.1.3	Personnel are involved in identifying and mitigating physical and online risks to children and adults.	✓			

Observations:

8.1.1 – All sacraments of reconciliation for children are held in open spaces. Some confessional spaces need to be modified for the sacrament of reconciliation for adults. Refer Recommendation #8.

Criterion 8.2 - The online environment is used in accordance with the Code of Conduct and Safeguarding policy.	Developed & Embedded	Developed	Developing	Yet to Develop
8.2.1	Personnel access and use online environments in line with the entity's Code of Conduct, Privacy Act and relevant communication protocols.	✓			
8.2.2	The online environment is monitored, and breaches are managed in accordance with disciplinary, or other relevant policies and reported to the leadership.	✓			

Observations:

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

Criterion 8.3 - Risk management plans address the range of settings, activities, and physical environments in which ministry and/or service occur.	Developed & Embedded	Developed	Developing	Yet to Develop
8.3.1	A process is in place to assess and manage risk if the organisation becomes aware of the presence of someone who poses an unacceptable risk to others within their ministry and/or service.	✓			

Observations:

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

Criterion 8.4 – Where facilities and services are contracted to and from third parties, contractual arrangements specify safeguarding considerations.		Developed & Embedded	Developed	Developing	Yet to Develop
8.4.1	If a third party provides services or uses the organisations facilities appropriate safeguarding policies and practices are in place.	✓			

Observations:

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

Standard 9	Continuous improvement

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

Criterion 9.1 - The safeguarding practices for the protection of children and adults at risk are regularly reviewed.		Developed & Embedded	Developed	Developing	Yet to Develop
9.1.1	The Safeguarding Implementation Plan outlines how safeguarding practices are monitored and reviewed, and how this information is reported.		✓		
9.1.2	The Church Authority monitors the implementation of the National Catholic Safeguarding Standards and co-ordinates annual local self-assessment checks.	✓			
9.1.3	The Safeguarding Policy is subject to review at least every three years and outcomes of this review are documented.	✓			

Observations:

As the Diocese rollout PACEM, it will continue to support parishes to implement safeguarding policies, procedures and processes. Refer Recommendation #1.

Criterion 9.2 – Concerns and complaints are analysed to identify causes and systemic failures in safeguarding practices.		Developed & Embedded	Developed	Developing	Yet to Develop
9.2.1	All individual incidents or complaints relating to safeguarding practices and/or failures are considered by the leadership to identify systemic patterns and support continuous improvement.		✓		

Observations

The Diocese does not ask parishes and ministries to send them a copy of their risk assessments. Refer to Recommendation #9.

Criterion 9.3 - The Church Authority reports on the findings of its safeguarding reviews.		Developed & Embedded	Developed	Developing	Yet to Develop
9.3.1	The findings of relevant reviews of safeguarding policies, procedures, and practices to are reported to stakeholders.	✓			
9.3.2	The findings of audits or reviews undertaken or validated by ACSL are made public.	Not applicable – this is the first audit by ACSL			

Observations:

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

Standard 10	Policies and procedures support the safety of children and adults

Policies and procedures document how the entity is safe for children and adults.

Criterion 10.1 - Policies and procedures address the National Catholic Safeguarding Standards.		Developed & Embedded	Developed	Developing	Yet to Develop
10.1.1	All relevant policies and procedures reference appropriate safeguarding approaches, requirements and responsibilities.	✓			

Observations:

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

Criterion 10.2 - Policies and procedures are accessible and easy to understand.		Developed & Embedded	Developed	Developing	Yet to Develop
10.2.1	The policies and procedures relevant to safeguarding are readily available and accessible to all personnel.	✓			

Observations:

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

Criterion 10.3 - Best practice models and stakeholder consultation inform the development and review of policies and procedures.		Developed & Embedded	Developed	Developing	Yet to Develop
10.3.1	There are processes in place to monitor how safeguarding policies and procedures are being implemented.	✓			
10.3.2	There is a process in place to develop and review safeguarding policies and procedures.	✓			

Observations:

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

Criterion 10.4 - Church leaders champion and model best practice implementation of the National Catholic Safeguarding Standards.		Developed & Embedded	Developed	Developing	Yet to Develop
10.4.1	The Church Authority and leaders promote the NCSS and enact all policies and procedures relevant to safeguarding.	✓			

Observations:

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

Criterion 10.5 - Personnel understand and implement the policies and procedures.		Developed & Embedded	Developed	Developing	Yet to Develop
10.5.1	Personnel are encouraged to reflect on their understanding and practical implementation of policies and procedures and provide feedback.	✓			

Observations:

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

5. Detailed findings

Standard 1: Committed leadership, governance and culture

The safeguarding of children and adults is embedded in the entity's leadership, governance and culture

Recommendation #1		
1.4.3	**The Code of Conduct considers the needs of all children and adults at risk, paying particular attention to:** • **First Nations people.** • **individuals who are elderly, are living with disability, are suffering from an illness, or who are at risk of abuse;** • **individuals from culturally and linguistically diverse backgrounds.** • **children in out of home care, or are homeless; and,** • **children and adults of diverse sexuality.**	**Priority 2**
1.6.1	**Information sharing and record keeping policies and procedures are documented and communicated to personnel.**	
Details of finding	The following points were noted: • the Diocesan Code of Conduct does not state that it applies to all personnel in the Diocese – clergy, paid personnel and volunteers. • there is some understanding in parishes and ministries on record obligations and information sharing and the Diocese needs to clarify recording expectations.	
Recommendation	1. The Diocese will update the Diocesan Code of Conduct to confirm that it applies to everyone involved in ministry in the Diocese. 2. The Diocesan integration of PACEM record management system could clarify what recording system will be utilised to support all parishes, ministries and agencies to fulfill their obligations on information sharing and record management for safeguarding and professional standards.	
Agreed Action	1. The Diocese will update the Code of Conduct to confirm that it applies to everyone involved in ministry in the Diocese. 2. The Diocese will explore PACEM record management systems and utilise the systems which will support the Diocese to fulfill their record management obligations.	
Responsibility	Safeguarding Coordinator	
Due date	February 2026	

Standard 2: Children and adults are safe, informed and participate

Children and adults are informed about their rights, participate in decisions affecting them and are taken seriously

Recommendation #2		
2.1.2	Adults at risk (or carers where appropriate) are engaged to provide their views about decisions which affect them, what makes them feel safe and to contribute to safeguarding approaches.	Priority 3
2.3.1	Adults at risk (or their carers where appropriate), are provided with information about safe and respectful relationships.	
2.4.1	Children and families are provided with information, access and/or referral to abuse prevention programs, appropriate to the child's age, development, ability, and level of understanding.	
Details of finding	The following points were noted: • The Diocese is yet to embed process that will engage adults at risks feedback on decisions which affect them and make them feel safe in ministries. • The Diocese has developed some information about safe and respectful relationships for adults at risk and this could be extended to other parishioners across the Diocese. • More generic and age-appropriate information could be provided about abuse prevention programs in public areas.	
Recommendation	The Diocese will: 1. Design and implement appropriate consultative strategies that engage adults at risk in their ministries. 2. Design or source information focused on safe and respectful relationships when engaging with adults at risk in their ministries. 3. Display generic and age-appropriate information about abuse available in local communities.	
Agreed Action	The Diocese will: 1. Design and implement appropriate consultative strategies that engage adults at risk in their ministries. 2. Design or source information focused on safe and respectful relationships when engaging with adults at risk in their ministries. 3. Display generic and age-appropriate information about abuse available in local communities.	
Responsibility	Safeguarding Coordinator	
Due date	June 2026	

Standard 3: Partnering with families, carers and communities

Families, carers and communities are informed and involved in promoting the safeguarding of children and adults

Recommendation #3		
3.1.1	The entity encourages parents, carers and/or guardians to take an active role in monitoring the safety of those engaged in the ministry and/or service.	Priority 3
3.4.1	The entity promotes and/or participates in activities which raise awareness of abuse prevention and the rights and dignity of children and adults at risk.	
Details of finding	The following points were noted: • The Diocese could encourage parents, carers and/or guardians to take a greater active role in safeguarding and promoting it as everyone's responsibility. • Parishes and ministries make greater use of national and international themed days (for older people, migrants, refugees, people with disabilities, etc.) to highlight the safeguarding needs of such people.	
Recommendation	The Diocese will offer: 1. Support to parishes and ministries to engage everyone in safeguarding and promote safeguarding as everyone's responsibility. 2. Support to parishes and ministries to promote the particular safeguarding needs of these groups of people.	
Agreed Action	The Diocese will offer: 1. Support to parishes and ministries to engage everyone in safeguarding and promote safeguarding as everyone's responsibility. 2. Support to parishes and ministries to promote the particular safeguarding needs of these groups of people.	
Responsibility	Safeguarding Coordinator	
Due date	June 2026	

Standard 4: Equity is promoted and diversity is respected

Equity is upheld and diverse needs respected in policy and practice.

Recommendation #4		
4.2.1	Children and adults have access to information, support and complaints processes in ways that promote inclusion, are culturally safe, and accessible.	Priority 3
Details of finding	The following points were noted: • Some personnel interviewed suggested the Diocese could provide additional safeguarding materials that promote inclusion, and that are culturally safe and accessible.	
Recommendation	The Diocese will: 1. Develop a range of safeguarding materials, using a variety of media, to promote inclusion that are culturally sensitive to parishioners needs.	

Agreed Action	The Diocese will: 1. Develop a range of safeguarding materials, using a variety of media, to promote inclusion that are culturally sensitive to parishioners needs.
Responsibility	Safeguarding Coordinator
Due date	June 2026

Standard 5: Robust human resource management

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

Recommendation #5		Priority 2
5.4.1	**Professional supervision, mentoring, and annual performance reviews for personnel include a focus on safeguarding responsibilities.**	
Details of finding	The following points were noted: • During the fieldwork interviews we noted that supervision is in place for most personnel and could be extended further to everyone. Additionally, annual appraisals need to include a safeguarding dimension.	
Recommendation	1. The Diocese will offer supervision to all personnel and include a safeguarding dimension into annual appraisals.	

Agreed Action	1. The Diocese will offer supervision to all personnel and include a safeguarding dimension into annual appraisals.
Responsibility	Safeguarding Coordinator
Due date	February 2026

Standard 6: Effective Complaints Management

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

Recommendation #6		Priority 2
6.1.3	**The Complaint Handling Policy outlines how perceived or actual conflict of interests are managed.**	
6.6.2	**Arrangements are in place to monitor, supervise and support a respondent, where there is a complaint, until (and if) the Church Authority no longer has this responsibility.**	
Details of finding	The following points were noted: • The Conflict-of-Interest policy needs to clearly articulate how it will manage any conflict of interest.	
Recommendation	1. The Diocese will update the Conflict-of-Interest policy and cross reference it with other associated human resource policies.	

Agreed Action	1. The Diocese will update the Conflict-of-Interest policy and cross reference it with other associated human resource policies.
Responsibility	Safeguarding Coordinator
Due date	February 2026

Standard 7: Ongoing education and training

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

Recommendation #7		
7.3.1	Education and training programs include materials addressing factors that may place adults at risk of abuse, building knowledge to: • understand the nature and impact of adult abuse. • understand the nature, factors, and impact of institutional abuse. • identify risk factors, such as abuse of power, and exploitation. • recognise how adults and institutions can be groomed, including power imbalances can be exploited; and understand what could make specific adults at increased risk of abuse.	Priority 2
7.5.1	Cultural safety training is provided to equip personnel to create, culturally safe environments for Aboriginal and Torres Strait Islander people.	
7.5.2	Training is provided to relevant personnel to equip them with the knowledge and understanding of diverse cultural backgrounds and how to create safe environments for people from these groups	
Details of finding	The following points were noted: • The Diocese has identified areas of continuous improvement in their training program.	
Recommendation	1. The Diocese will develop an implementation plan for their identified training.	

Agreed Action	1. The Diocese will develop an implementation plan for their identified training.
Responsibility	Safeguarding Coordinator
Due date	February 2026

Standard 8: Safe physical and online environments

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

Recommendation #8		
8.1.1	Both physical and online risks are addressed within the provision of ministry and/or services including risks arising from: • one-to-one interactions between an adult and a child; • ministries and/or services such as counselling, home visits, outreach, one-to-one tuition, the sacrament of reconciliation, spiritual direction and mentoring; • potential physical contact between the penitent and the confessor where the sacrament of reconciliation is celebrated; • one-to-one interaction with adults at risk; • child-to-child interactions. • adult-to-child interactions; • adult-to-adult interactions (with consideration to power imbalances); and • the nature of physical spaces. Wherever possible, these interactions are conducted in an open or visible space, or within clear line of sight of another adult.	**Priority 2**
Details of finding	The following points were noted: • Most parishes have changed/modified confessional spaces to perform this sacrament.	
Recommendation	1. The Diocese will develop a plan to modify the remaining confessional spaces.	
Agreed Action	1. The Diocese will develop a plan to modify the remaining confessional spaces.	
Responsibility	Safeguarding Coordinator	
Due date	February 2026	

Standard 9: Continuous improvement

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

Recommendation #9		
9.2.1	**All individual incidents or complaints relating to safeguarding practices and/or failures are considered by the leadership to identify systemic patterns and support continuous improvement.**	**Priority 2**
Details of finding	The following points were noted: 1. The Diocese would benefit from developing an overall risk management plan that incorporates the risks identified through parishes and ministries.	
Recommendation	1. The Diocese will request parishes and ministries to send them their risk management plans annually and the Diocese will create an overarching safeguarding management plan.	

Agreed Action	1. The Diocese will request parishes and ministries to send them their risk management plans annually and the Diocese will create an overarching safeguarding management plan.
Responsibility	Safeguarding Coordinator
Due date	February 2026

Appendix A

COMPLIANCE ASSESSMENT SCALE

	General	Processes & Systems	People & Resources
Yet to Develop	As an entity we are unable to demonstrate that the requirements of the indicator are in place and will implement the necessary strategies developed through the Standards Action Plan.	Processes may be in place however the specific requirements of the indicator have not been addressed. The actions generated through the Standards Action Plan will be implemented.	At an entity level resources have yet to be assigned. The people and resources will be determined and allocated in the Standards Action Plan.
Developing	Our entity has begun to address the requirements of the indicator, however processes are developing and not universally applied.	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.	Personnel capabilities vary across the entity and resources and responsibility are not formally assigned. This will be addressed in the Standards Action Plan.
Developed	Our entity is addressing the indicator and is in the process of implementing its requirements. The gaps will be highlighted and addressed through the Standards Action Plan.	Relevant processes and systems have been defined and developed but are yet to be implemented across the full operations of the entity. A plan is being developed to fully implement processes and systems.	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. This will be remediated through the Standards Action Plan.
Developed and embedded	The entity can demonstrate that indicator requirements are formally embedded. Processes are operating effectively, and opportunities provided for continuous improvement.	Relevant processes are integrated and coordinated, including remote operations and reviews/audits of activities.	Personnel are trained to detect and report on deviations or break downs in processes. Resources have been assigned to monitor and address requirements.

Appendix B

AUDIT FINDING PRIORITIES

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. 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.	Progress has been made with respect to implementation of the required indicator, however full compliance is yet to be achieved. 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.	Issues have been identified which represent minor procedural weaknesses or improvement opportunities with respect to the operation of the indicator. Expected resolution is within 12 months or earlier from the issuance of this report.

Appendix C

The definitions of 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.

Abuse	when used throughout the NCSS document this is an inclusive term covering both child and adult abuse
Abuse of Power	means the abuse of position, function, or duty to take advantage of another. This can take many forms and include situations where a person has power over another person by virtue of their relationship (e.g., employer and employee, teacher and student, coach and athlete, parent or guardian and child, clergy/religious and parishioner) and uses that power to their advantage.
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.
Adult	means any person 18 years or older. When used throughout the NCSS document this is an inclusive term referring to all adults, including adults at risk.
Adult abuse	means the improper treatment of a person that results in the actual and/or likelihood of causing physical or emotional harm. Abuse can come in many forms, such as: physical or verbal maltreatment, neglect, injury, assault, violation, rape, unjust practices, crimes, exploitation, or other types of aggression. There are several categories of abuse of adults, such as: • Sexual abuse* • Physical abuse* • Emotional/psychological abuse* • Neglect* • Elder abuse* • Financial abuse* • Exploitation* Within the context of the Catholic church and faith-based entities, it is also important to recognise spiritual abuse* as an additional subtype of abuse.
Adult at risk	means any person aged 18 years and over who is at increased risk of experiencing abuse, such as people:

	- who are elderly. - with a disability. - who suffer from mental illness. - who have diminished capacity. - who have cognitive impairmen.t - who have suffered previous abuse. - who are experiencing transient risks. - who in receiving a ministry or service are subject to a power imbalance. - who are from a culturally or linguistically diverse background/ - who are of diverse sexuality/ - who have any other impairment or adversity that makes it difficult for them to protect themselves from abuse.
Allegation	means a complaint, still to be verified, claiming, or asserting that someone has committed an act of abuse against a child or adult. The term is used interchangeably and in combination with "complaint".
Audit	means a mechanism to assess how a Church Authority, ministry or entity governed by a Church Authority, is implementing the National Catholic Safeguarding Standards.
Australian Catholic Bishops Conference	means the assembly of Bishops of Australia exercising together certain pastoral offices for the Catholics of Australia.
Bishop	means a diocesan bishop or archbishop, the ordinary of an Ordinariate and the prelate of a Personal Prelature of the Latin Church and an eparch of 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 legislation promulgated by the competent ecclesiastical authority.
Canonical Offence	means canonical crimes[1] of sexual abuse committed by clerics and religious are: - forcing someone, by violence or threat or through abuse of authority, to perform or submit to sexual acts. - performing sexual acts with a minor or a vulnerable person. - the production, exhibition, possession, or distribution, including by electronic means, of child pornography, as well as by the recruitment of or inducement of a minor or a vulnerable person to participate in pornographic exhibitions. [1] The canonical crimes/delicts/offences committed by clerics or religious as stated in Art. 1 §1 a) of *Vos Estis Lux Mundi.* [2] Definition of vulnerable person as stated in Art. 1 §2 b) of *Vos Estis Lux Mundi*: "means: any person in a state of infirmity, physical or mental deficiency, or deprivation of personal liberty which, in fact, even occasionally, limits their ability to understand or to want or otherwise resist the offence". This definition is captured by the term 'Adult at risk' within the NCSS.
Catholic Religious Australia	CRA is the conference of major superiors comprising leaders of religious institutes and societies of apostolic life within the Catholic Church in Australia.

Certification	means the act of giving official authority or approval and certification of the implementation of the NCSS and permission to use the ACSL Certification symbol.
Child/ren	means individuals under 18 years of age.
Child abuse	There are different legal definitions of child abuse in Australia. Definition sourced from the Australian Institute of Family Studies: https://aifs.gov.au/cfca/publications/reporting-abuse-and-neglect Child abuse refers to any behaviour or treatment by parents, caregivers, other adults or older adolescents that results in the actual and/or likelihood of causing physical or emotional harm to a child. Such behaviours may be intentional or unintentional and can include acts of omission (i.e., neglect) and commission. Child abuse and neglect is commonly divided into five subtypes: • physical abuse • emotional/psychological abuse • neglect • sexual abuse • exposure to family violence
Church Authority	means: • a diocesan bishop or archbishop, an ordinary of an Ordinariate and the prelate of a Personal Prelature of the Latin Church and an eparch of an eparchy of an Eastern Church. • the competent authority, howsoever titled, exercising the ministry of governance for religious institutes in Australia in accordance with their Constitutions; or • for ministerial PJPS the competent authority in accordance with the statutes. • for any other Church entity, the senior authority within the organization in accordance with its rules.
Church Protocols	means official procedures or system of rules which govern the affairs of the Catholic Church in Australia, for example, Vos Estis Lux Mundi and the National Response Protocol.
Civil Standard	the most common standard of proof relates to civil proceedings, which is the balance of probabilities (incorporating the principles from Briginshaw v Briginshaw) – which means it is more probable than not that what the person says happened is true (in criminal cases, the standard is proof beyond reasonable doubt).
Clergy	includes bishops, priests and deacons.
Clergy and religious from countries other than Australia	means any cleric or member of a religious institute who is specifically recruited or welcomed from overseas by a Church Authority or entity.
Cleric	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 that it occurs when "clerics feel they are superior, [and when] they are far from the people." It can be "fostered by priests themselves or by lay persons".

Cognitive impairment	means when a person has trouble remembering, learning new things, concentrating, or making decisions that affect their everyday life, because of their condition. Some causes of long-term or permanent cognitive impairment include dementia, stroke, or brain injury. For further information see: https://www.healthdirect.gov.au/cognitive-impairment
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. A complaint may also include disclosures made to an institution that may be about, or relate to, abuse in the entity's context.
Conflicts of interest	means situations (perceived or actual) 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 and may occur when personnel function in multiple roles.
Consecrated Life/Institute of Consecrated Life	is an association of faithful in the Catholic Church erected by canon law whose members profess the evangelical counsels of chastity, poverty, and obedience by vows or other sacred bonds (as defined in the Code of Canon Law under canons 573–730). Apart from being a member of an institute, consecrated life may also be lived individually; the Catholic Church recognises, as forms of individual consecrated life that are not members of institutes, namely that of hermits and consecrated virgins.
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 a department of the Roman Curia.
Dignity or Right to Risk	refers to enabling individuals the right (or dignity) to take reasonable risks. It recognises that restricting this right can stifle the individual's growth, self-esteem and the overall quality of life: 'Given that an individual's personal dignity is manifested, in part, by their ability to remain autonomous, and being autonomous engenders risk-taking. Inhibiting an individual's ability to take risks erodes their dignity. Dignity of risk is therefore the principle of allowing an individual the dignity afforded by risk-taking, subsequently enhancing their personal growth and quality of life.' (Joseph E Ibrahim and Marie-Claire Davis, 'Impediments to Applying the "Dignity of Risk" Principle in Residential Aged Care Services: "Dignity of Risk" in Residential Aged Care', Australasian Journal on Ageing 32, no. 3 (September 2013): 188–93)
Diminished capacity	means if an adult needs to make a decision and is unable to carry out any part of this process (as listed below), they have impaired decision-making capacity. There are three elements to making a decision:

	• understanding the nature and effect of the decision; • freely and voluntarily deciding; and • communicating the decision in some way.
Diocese	means a diocese, archdiocese, ordinariate or personal prelature of the Latin Church and an eparchy of an Eastern Church.
Disability (persons with)	means those who have physical, mental, intellectual, or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others. (Article 2, United Nations Convention on the Rights of Persons with Disabilities.)
Diversity	means a range of people who have various racial, ethnic, socioeconomic, and cultural backgrounds and various lifestyles, experience, and interests.
Diverse sexuality	refers to all the diversities of sex characteristics, sexual orientations, and gender identities, without the need to specify each of the identities, behaviours, or characteristics that form this plurality.
Elder abuse	means a single or repeated act or lack of appropriate action, occurring within any relationship where there is an expectation of trust which causes harm or distress to an older person.
Emotional abuse (adults)	is a common form of abuse that occurs in close relationships. Emotional abuse is defined as abuse that occurs when a person is subjected to behaviours or actions aimed at preventing or controlling their behaviour, with the intent to cause them emotional harm or fear, through manipulation, isolation, or intimidation.
Emotional abuse (children)	Emotional abuse of children refers to a parent or caregiver's inappropriate verbal or symbolic acts towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability. Such acts of commission or omission are likely to damage a child's self-esteem or social competence.
Entity	means a diocese, religious institute, ministerial PJP (including their agencies) or association recognised as Catholic in accord with canon law.
Exploitation	is the deliberate maltreatment, manipulation or abuse of power and control over another person. It is taking advantage of another person or situation usually, but not always, for personal gain.
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.
Financial abuse	involves the illegal or improper use or mismanagement of a person's money, property or resources. Stealing, fraud, forgery, embezzlement, forced changes to a will, inappropriate removal of a resident's decision-making powers and misuse of power of attorney are all forms of financial abuse or exploitation.
Formation/program	means a program preparing individuals for ordination or profession of vows and a life-long journey to the invitation of Christ to proclaim and live the Gospel message, within the life of the Church.

Good Standing	A person in good standing is regarded as having complied with all their safeguarding obligations, and is not subject to any form of allegation, disciplinary process, sanction suspension.
Grooming (child)	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.
Grooming (adult)	is the predatory act of manoeuvring another individual into a position that makes them more isolated, dependent, likely to trust, and more vulnerable to abusive behaviour.
Guardian	refers to the person(s) who has the legal authority to care for the personal and property interests of another person.
Institutional abuse	means abuse or poor care within an institution or specific care setting. Possible causes of institutional abuse include: • a "closed" culture within an organisation where transparency is discouraged. • lack of flexibility and choice for people using the service. • failure to properly check the backgrounds and interview staff. • inadequate training. • lack of safeguarding policies and procedures. • lack of support of staff by management. • poor supervision; and • poor standards of care.
Lay/lay person	means members of the Catholic Church and Church personnel 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.
Mentor	means an experienced and trusted advisor or a person who gives a younger or less experienced person help and advice over a period.
Ministerial PJP	means a legal entity which is constituted a public juridic person in canon law and carries on its mission in the name of the Church, in accordance with its statutes approved by the competent ecclesiastical authority.
Ministry	means any activity within, or conducted by, an entity, that is authorised by formal appointment and designed to carry out the apostolic and charitable works of the Catholic Church.
NDIS Worker Screening Check	The NDIS Worker Screening Check is an assessment of whether a person who works, or seeks to work, with people with disability poses a risk to them. The assessment determines whether a person is cleared or excluded from working in certain roles with people with disability. For further information see https://www.ndiscommission.gov.au/about/ndis-worker-screening-check
Neglect (adult)	is the failure of a carer to provide the necessities of life to a person for whom they are caring.
Neglect (child)	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.
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.
Organisation	means a ministry and/or service operating under the governance of a recognised authority (such as a legal entity) and/or a Church Authority.
Pastoral care	means when one person has responsibility for the wellbeing of another or for a faith community. It includes the provision of spiritual advice and support, education, counselling, medical care, and assistance in times of need. All work involving the supervision or education of children and young people is a work of pastoral care.
Personnel (Church personnel)	means a cleric, religious or other person who is employed by the entity or engaged on a contract, subcontract, voluntary or unpaid basis.
Physical abuse	is a non-accidental physically aggressive act which results in physical pain or injury, and which may include physical coercion and physical restraint. Physical abuse may be intentional or may be the inadvertent result of physical punishment.
Professional/pastoral supervision	means a professional activity in which personnel are engaged in reflection and learning, under the guidance of a supervisor. Supervision assists personnel in their accountabilities for professional standards, defined competencies for their role and understanding and implementation of organisational policy and procedures. For clerics and religious, professional supervision assists in the maintenance of boundaries of the pastoral relationship and enhances the quality of their ministry.
Protective behaviours program	Is a type of abuse prevention program and means an age-appropriate structured education program to equip children and young people with the skills and knowledge to enhance their personal safety.
Reflective practice	is a professional development technique that involves thoughtfully considering one's own experiences in applying knowledge to practice. It is expected to be a continuous process, whereby an individual explores an experience to identify what happened and what their role in this experience was, including behaviour, thinking, and related emotions. Reflective practice enables potential changes in approaches to similar future events to be identified, with the aim of improved performance.
Religious institute	means an entity within the Catholic Church whose members commit themselves through religious vows to lead a life of poverty, chastity and obedience. Societies of apostolic life resemble religious institutes in that their members also live a life in common. They do not take religious vows but live out the apostolic purpose of the group. In these Standards, the term 'religious institutes' is used to include religious institutes, societies of apostolic life and secular institutes.
Religious	means a member of an institute of consecrated life or a society of apostolic life.
Respondent	means a person against whom a complaint is made.

Review	means an internal self-assessment of an entity's implementation of the National Catholic Safeguarding Standards. A review can also be an assessment that forms part of the process of continuous improvement which occurs when following up recommendations made during an audit.
Risk-based audit and Review Framework	means a framework for assessing the implementation of the National Catholic Safeguarding Standards that reflects a proportionate response based on the risk profile of the Church Authority.
Risk Profile	means an assessment against key safeguarding risk factors.
Safeguarding	refers to proactive measures designed to protect the health, wellbeing, and human rights of individuals. These measures allow children, young people and adults to live free from abuse, harm and neglect. Within the life of the Church, safeguarding includes pastoral, liturgical and spiritual responses through engagement in the Sacraments and the life of the Church.
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 coordinating annual self-audits at a local level. Committee members need relevant and varied professional expertise in relation to safeguarding, child protection, organisational culture and structure, policy development, etc. and include lay women and men.
Safeguarding Culture	means embedding safeguarding into everything an organisation does. In promoting this culture, young people and adults at risk will understand they will be listened to, supported, and known action will be taken on their behalf.
Safeguarding Commitment Statement	means a Commitment Statement describing an entity's commitment to keep children and adults safe from harm. It informs the entity's safeguarding culture.
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, delegations, and accountabilities, and tracks review and progress. It is overseen by the Safeguarding Committee.
Safeguarding policies and procedures	means any policies or procedures of the entity that address elements of safeguarding children and adults. For example, but not limited to: • recruitment. • risk management. • complaint handling; and • acceptable use of online applications.
Seminarian	a student in a theological formation and education centre preparing for ordination as a priest.
Seminary	means a centre for the formation and education of students preparing for ordination.

Sexual abuse (adult)	Sexual abuse is a form of sexual assault. Sexual abuse includes rape, indecent assault, sexual harassment, and sexual interference. Sexual activity with an adult who is incapacitated by a mental or physical condition (such as dementia) that impairs his or her ability to grant informed consent, is defined as sexual assault/abuse. Sexual assault/abuse includes where through force, threats or abuse of authority, an individual commits a canonical offence or forces someone to perform or submit to sexual acts. Sexual assault is a crime.
Sexual abuse (child)	refers to exposing a child to any form of sexual activity. This may or may not involve physical contact. 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.
Spiritual abuse	means abuse of a person that invokes a person's religious beliefs and faith to perpetrate harm. Spiritual abuse can occur as a secondary experience of abuse when abuse is perpetrated by someone in a position of spiritual authority and trust within the Church a
Substantiated complaint	means under the civil standard of proof an allegation of abuse for which the investigator finds that sufficient evidence exists to believe that the alleged conduct more likely than not occurred.
Third parties	means any individual, group or legal entity outside the Church entity who contract services and facilities to or from the Church entity.
Transient Risk	means short-term risk, experienced by people at different stages in their life: e.g. when someone is vulnerable due to: • grief • bereavement • relationship breakdown • homelessness • unemployment • financial hardship
Trauma-informed and victim-centred support	is a strengths-based framework which is founded on five core principles – safety, trustworthiness, choice, collaboration, and empowerment. Trauma-informed services do no harm: they do not re-traumatise or blame victims for their efforts to manage their traumatic reactions, and they embrace a message of hope and optimism that recovery is possible. In trauma-informed services, trauma survivors are seen as unique individuals who have managed their responses to the experiences as best that they could.
Validation	means an assessment by ACSL of any self-assessment, review or audit, undertaken to achieve ACSL Certification status.
Working With Children Check	means generic term used in the National Catholic Safeguarding Standards to denote the statutory screening requirement for people who work or volunteer in child-related work. There is not yet a single national framework setting out requirements for 'working with children' checks. Each State/Territory in Australia has its own system. They are one part of a Church entity's recruitment, selection, and screening practices.
Working with Vulnerable People Check	means the Working with Vulnerable People (Background Checking) Act 2011 in the Australian Capital Territory which requires those

| | working with children (and other vulnerable groups) to complete a Working with Vulnerable People Check and be registered before they can commence employment.

Tasmania has a 'Working with Vulnerable People Check' which requires all employees and volunteers aged 16 and over working in childcare services or other child-related services to apply for a WWVP check.

To date, only the ACT and Tasmania have this requirement. |