

Submitted Date	31-May-2018 12:28
Total Time Taken	682.08
Come-back-Later Code	7X3LX8NDNP
1. Is this an individual response or are you officially responding on behalf of an organisation?	Catholic entity
4. Please provide the name of the Catholic entity you are officially responding on behalf of	St John of God Healthcare Inc
6. Please indicate the approximate number of Church personnel affiliated with your organisation	5000+
8. Please select the state(s) and/or territory(s) you are based in?	New South Wales, Victoria, Western Australia
Do you consent to your identifying details being published, in addition to your responses, on the CPSL website?	Yes, CPSL can publish my identifying details
General feedback relating to the Standards	
1. The National Catholic Safeguarding Standards are: - Easy to understand	Agree
1. The National Catholic Safeguarding Standards are: - Presented in a logical manner	Agree
1. The National Catholic Safeguarding Standards are: - User-friendly	Agree
1. The National Catholic Safeguarding Standards are: - Consistent and accurate in their use of terminology	Strongly agree
2. I/we believe that the National Catholic Safeguarding Standards create conditions that will increase the likelihood of identifying and reporting harm to children in Catholic entities.	Agree
3. I/we believe that the National Catholic Safeguarding Standards will facilitate appropriate response to disclosures, allegations and suspicions of harm to children in Catholic entities.	Agree
4. I/we believe that the National Catholic Safeguarding Standards will reduce the likelihood of harm to children in Catholic	Agree

entities.

Please provide further explanation regarding your choice of responses to questions 1 to 4, either by providing a general comment below and/or providing specific comments against each Standard in the next section of the Survey.

5. General/Overall comments on the National Catholic Safeguarding Standards

The National Catholic Safeguarding Standards (Draft) are principally aligned to the vision and direction of St John of God Healthcare in relation to child safety.

Overarching comment/feedback is summarised below:

1. The NCSS appear to be, understandably, written for those organisations whose primary, or at least a large part of work, is focused on children. Some indicators may be too prescriptive for organisations where the provision of services is not predominantly directed towards children. For example: a requirement for 'child safety' to be a standing agenda item at all leadership meetings across a healthcare organisation would seem overly burdensome, with the potential of an unintentional consequence of the agenda item to become regarded as impertinent. A proposal for such organisations may be to undertake an annual evaluation, led by management and evaluated by the Board, of the adequacy of child safety measures.

2. In order for organisations to avoid unnecessary duplication of compliance requirements, perhaps the NCSS could articulate how the standards will fit with current legislation (ie Victoria) and future legislative provisions by other states.

3. The NCSS would benefit from a definition for 'vulnerable person'.

4. In relation to the auditing of compliance against the NCSS, who will bear the cost of the audits? What will the frequency be?

5. Will the auditing consider measures already taken to achieve compliance with legislation rather than confirming that each and every 'implementation and evidence guide' criteria has been met?

6. In reading the NCSS it is difficult to determine application where an organisation is not typically a ministry based organisation.