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Total Time Taken	2190.48
Come-back-Later Code	33YG47QX84
1. Is this an individual response or are you	Individual
officially responding on behalf of an	
organisation?	
2. Please provide your name	Rev Dr P A McGavin
3. Please indicate your stakeholder group(s):	Clergy/Religious
8. Please select the state(s) and/or territory(s)	New South Wales
you are based in?	
Do you consent to your identifying details	Yes, CPSL can publish my identifying details
being published, in addition to your responses,	
on the CPSL website?	
General feedback relating to the Standards	
1. The National Catholic Safeguarding	Agree
Standards are: - Easy to understand	
1. The National Catholic Safeguarding	Agree
Standards are: - Presented in a logical manner	
1. The National Catholic Safeguarding	Agree
Standards are: - User-friendly	
1. The National Catholic Safeguarding	Agree
Standards are: - Consistent and accurate in	
their use of terminology	
2. I/we believe that the National Catholic	Agree
Safeguarding Standards create conditions that	
will increase the likelihood of identifying and	
reporting harm to children in Catholic entities.	
3. I/we believe that the National Catholic	Agree
Safeguarding Standards will facilitate	
appropriate response to disclosures,	
allegations and suspicions of harm to children	
in Catholic entities.	
4. I/we believe that the National Catholic	Agree
Safeguarding Standards will reduce the	
likelihood of harm to children in Catholic	
entities.	
	I .

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 survey states feedback only on Standards 1 - 10. But there is a huge gap in these standards: they do not ensure that those who run the Safeguarding Programs are appropriately qualified. I have experience with persons who are inadequately qualified and who bring "their own agenda" to the program. Specification of competencies to run the program need articulation; and these need to be broad-based (for example, include understanding processes of psycho-sexual development).

Also lacking is adequate safeguards for those against who complaints are raised: there must be complete transparency, and accountability by the Safeguarding Personnel, and there must be expeditious handling of issues (indefinite sidelining of clergy, with attendant derogation of their status should not be allowed). There must be greater clarity of the personal responsibilities of Bishops and other Superiors.

On 7.1.2 of "at least annual refresher": I have gone through these and learned nothing new. We live in an electronic age, and we should receive electronic posts of all updates, and be required by a specified date to return a post that we have read and understood the updates. We should not be treated like children who need classroom exposition. Most of my life I have been a priest/tertiary-educator, and I am a selfeducator. There need to be smarter ways of ensuring that church personnel are kept up-todate, and this requires flexibility in administration. The process tends to operate like a computer-based program, where there are only "right"/"wrong" boxes to tick. This is not intelligent. CPSL needs to move to intelligent and discriminatory (that is, with ethical discrimination and social discrimination) in practice. We are not "all the same".

## Standard 1: Committed leadership, governance and culture

1. How would you rate this Standard in relation	Effective
to safeguarding children from harm in Catholic	
entities?	
1a. Please explain your response.	The program reds like an "information
	curriculum"; whereas the really critical issues are
	character (that is, moral character) and
	understanding that is cast in a context of
	understanding social processes and
	understanding psychological processes (including
	psycho-sexual development).
2. What are the key challenges and	The key challenge is to keep Bishops (and other
opportunities for improvement in relation to	Superiors) responsible; otherwise they become
the topic covered by this Standard? Will the	just "rubber stamps" for a bureaucratic process.
National Catholic Safeguarding Standards	The central focus must be people, even before
address and alleviate these challenges?	process.
3. What are the main challenges and obstacles	The main challenge is that they be understood
you can foresee to the implementation of, and	and applied intelligently. An analogy is the street
achievement of compliance with, these	cameras that catch photography of exceeding
Standards?	40km zones. These zones may be on the other
	side of the street from the school; the school may
	be a senior high school; the school may have high
	and spiked steel fencing; there may be no egress
	along the 40km street (egress from an adjoining
	street); there may be pedestrian traffic lights. But
	it still costs hundreds of dollars to exceed 40km.
	The analogy is an example where there is need
	for intelligent application and accurate reading of
	social circumstances and vulnerabilities. In brief,
	the main challenge will be for the program to be
	administered intelligently.
4. Are there any gaps in the Standard, Criteria,	The biggest gap is equity applied to the person
Indicators or Implementation and Evidence	against whom a complaint is made. The next
Guide that you can identify, or areas that have	biggest gap is overt statement that the program
not been covered?	is targeted (to children; to vulnerable persons)
	and is not a simply across-board that can be
	used in a cavalier way.
	the next biggest gap is that persons
	administering the program are adequately
	equipped to do so (they should have had an
	intelligent education; not a "training").
	The next biggest gap is to ensure that the

program is administered in an "education" manner, rather than in a "training" manner; the latter degenerates to unintelligent protocol that does inadequately grapples with the complex issues that are engaged and the complex discernments that are to be made by persons engaging with children or vulnerable persons (and, of program, with persons generally).

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

1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	Excuse me, I did not notice the "Standard 1" heading on the previous page, and so my previous page gives my overall responses.
2. What are the key challenges and opportunities for improvement in relation to the topic covered by this Standard? Will the National Catholic Safeguarding Standards address and alleviate these challenges?	See above
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	See above
4. Are there any gaps in the Standard, Criteria, Indicators or Implementation and Evidence Guide that you can identify, or areas that have not been covered?	See Above

## Standard 3: Partnering with families, carers and communities

1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	See Standard 1 responses
2. What are the key challenges and	See above
opportunities for improvement in relation to	
the topic covered by this Standard? Will the	
National Catholic Safeguarding Standards	
address and alleviate these challenges?	

3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?  4. Are there any gaps in the Standard, Criteria, Indicators or Implementation and Evidence
achievement of compliance with, these Standards?  4. Are there any gaps in the Standard, Criteria, See above
Standards?  4. Are there any gaps in the Standard, Criteria, See above
4. Are there any gaps in the Standard, Criteria, See above
, , ,
Indicators or Implementation and Evidence
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Guide that you can identify, or areas that have
not been covered?
Standard 4: Equity is promoted and diversity is respected
1. How would you rate this Standard in relation   Effective
to safeguarding children from harm in Catholic
entities?
1a. Please explain your response.   See Standard 1 responses
2. What are the key challenges and See above
opportunities for improvement in relation to
the topic covered by this Standard? Will the
National Catholic Safeguarding Standards
address and alleviate these challenges?
3. What are the main challenges and obstacles See above
you can foresee to the implementation of, and
achievement of compliance with, these
Standards?
4. Are there any gaps in the Standard, Criteria, This illustrates the problem: it is program drive
Indicators or Implementation and Evidence rather than listening to what the respondent is
Guide that you can identify, or areas that have saying: let the respondent use own voice.
not been covered?
Standard 5: Robust human resource management
1. How would you rate this Standard in relation   Effective
to safeguarding children from harm in Catholic entities?
1a. Please explain your response.Please see responses to Standard 1
2. What are the key challenges and see above
opportunities for improvement in relation to
the topic covered by this Standard? Will the
National Catholic Safeguarding Standards
address and alleviate these challenges?
3. What are the main challenges and obstacles see above
you can foresee to the implementation of, and
achievement of compliance with, these

Standards?	
4. Are there any gaps in the Standard, Criteria,	see above
Indicators or Implementation and Evidence	
Guide that you can identify, or areas that have not been covered?	
Standard 6: Effective complaints manag	ement
1. How would you rate this Standard in relation	Effective
to safeguarding children from harm in Catholic	
entities?	
1a. Please explain your response.	Please see responses to Standard 1
2. What are the key challenges and	see above
opportunities for improvement in relation to	
the topic covered by this Standard? Will the	
National Catholic Safeguarding Standards	
address and alleviate these challenges?	see above
3. What are the main challenges and obstacles you can foresee to the implementation of, and	see above
achievement of compliance with, these	
Standards?	
4. Are there any gaps in the Standard, Criteria,	see above
Indicators or Implementation and Evidence	
Guide that you can identify, or areas that have	
not been covered?	
Standard 7: Ongoing education and train	ning
1. How would you rate this Standard in relation	Effective
to safeguarding children from harm in Catholic	
entities?	
1a. Please explain your response.	Most of us can't have 2 screens open at once, so
	if you want responses by individual standards,
	then you need to include individually at the top of
0.000	the screen the relevant standard!
2. What are the key challenges and	See responses to Standard 1
opportunities for improvement in relation to	
the topic covered by this Standard? Will the	
National Catholic Safeguarding Standards	
address and alleviate these challenges?	

3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	see above
4. Are there any gaps in the Standard, Criteria, Indicators or Implementation and Evidence Guide that you can identify, or areas that have not been covered?	see above
Standard 8: Safe physical and online env	vironments
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	See responses to Standard 1
2. What are the key challenges and opportunities for improvement in relation to the topic covered by this Standard? Will the National Catholic Safeguarding Standards address and alleviate these challenges?	see above
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	see above
4. Are there any gaps in the Standard, Criteria, Indicators or Implementation and Evidence Guide that you can identify, or areas that have not been covered?	On the online issue, there is need for graduated sensitivity and sensibilities; senior high school students are in a different category from primary school students in this respect, and they need room to make mistakes and discerning guidance in online usage.  A blanket approach will lead them to covert activities, and this is not desirable.  The same applies especially with seminarians: the history of offences arises from boys/young men not being assisted or even allowed in psycho-sexual/social development, and thus to their being immature and offending adults: discretion is needed and discernment rather than programmatic policing.
Standard 9: Policies and procedures support child safety	
1. How would you rate this Standard in relation	Effective

to safeguarding children from harm in Catholic entities?	
1a. Please explain your response.	Children also need discerning enculturation, so that they do not have a fearful attitude; they need to learn self-protective behaviours without being fearful and undiscerningly defensive. A great difficulty also involves the engagement with parents/carers. I have seen children/young persons quite damaged because of "uptight" parent/carer environments that do not cultivate good discernments about boundary violations.
2. What are the key challenges and opportunities for improvement in relation to the topic covered by this Standard? Will the National Catholic Safeguarding Standards address and alleviate these challenges?	see above
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	see above
4. Are there any gaps in the Standard, Criteria, Indicators or Implementation and Evidence Guide that you can identify, or areas that have not been covered?	You need to design a questionnaire program that you then have to "code", rather than one that is from the start "code" driven; because respondents will not fit your framework; your coding of responses needs to follow a more viable pattern (of course, I understand that you are trying to make it easy for yourselves, but it does not work for discerning survey work.
Standard 10: Regular improvement	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	There is only so much improvement that can be done. It should more reflect what is noticed as deficient (and significantly deficient, not very marginally deficient), and proceed from there: don't create your self-serving "industry"; seek to discriminate functionally.

see above 2. What are the key challenges and opportunities for improvement in relation to the topic covered by this Standard? Will the **National Catholic Safeguarding Standards** address and alleviate these challenges? 3. What are the main challenges and obstacles see above you can foresee to the implementation of, and achievement of compliance with, these Standards? 4. Are there any gaps in the Standard, Criteria, The term "risk assessment" is often used **Indicators or Implementation and Evidence** unintelligently by persons who have not had Guide that you can identify, or areas that have statistical education, and who tend to think that not been covered? any possibility requires action, whereas it is practical possibilities that require action. We cannot live in a totally "safe" world, and prudence requires a technical understanding of "risk assessment".