

Submitted Date	05-Jun-2018 15:11
Total Time Taken	3352.28
Come-back-Later Code	6PXEVU6N33
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	yourtown
6. Please indicate the approximate number of Church personnel affiliated with your organisation	1 - 100
8. Please select the state(s) and/or territory(s) you are based in?	New South Wales, Queensland, South Australia, Tasmania
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	Disagree
1. The National Catholic Safeguarding Standards are: - User-friendly	Disagree
1. The National Catholic Safeguarding Standards are: - Consistent and accurate in their use of terminology	Disagree
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

<p>entities.</p>	
<p>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.</p> <p>5. General/Overall comments on the National Catholic Safeguarding Standards</p>	<p>We provide further explanation of our responses to questions 1-4 below as well as in our comments to specific questions in relation to each Standard.</p> <p>yourtown strongly supports the Catholic Church (the Church) taking a leadership role in the development and implementation of child safe standards in institutions working with children in Australia. Given the core values of the Church and the findings of the Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission) in relation to the Church's past handling of abuse, the Church must ensure that systemic abuse is a tragic period of its history from which it learns and that is never repeated. Indeed, like all organisations working with children and young people, it has a responsibility to ensure that children and young people are safe when accessing its services and that any safety issues are appropriately reported and managed. Given the faith that Church personnel, followers and service users have in the Church, we believe it is especially important that the Church aspires to become a beacon of best practice in this area and one to which other organisations look.</p> <p>Therefore, we strongly welcome Draft One of the National Catholic Safeguarding Standards, standards which every Catholic institution will have to implement and against which be audited. However, we do not feel that in their current form they are fit for purpose, that more detail is required to substantiate what they mean and how they will work in practice, and that they challenge Church entities to become leaders in this area. We note that the development of the</p>

standards by Catholic Professional Standards Ltd (CPSL) is a three part process, and that Drafts Two and Three will seek to include much of the content that we currently feel is missing, partly explaining our responses to questions 1-4. Nonetheless, we will use this opportunity to provide feedback as to elements we consider to be of great significance and in this section provide general comments to this end.

Demonstrating leadership and commitment

"The leaders of the Church in Australia commit ourselves to repair the wrongs of the past, to listen to and hear victims, to put their needs first, and to do everything we can to ensure a safer future for children." -

Truth Justice Healing Council, Submission to the Royal Commission

A general and important observation about Draft One is that, unlike the Truth Justice Healing Council's submission to the Royal Commission for example, the language in the document does not adequately reflect the Church's aspiration to take a leadership role in developing and implementing child safe standards. We would advocate for stronger language to convey the Church's commitment to building child safe and friendly institutions to ensure that the wider community can be easily convinced of the Church's conviction in this area and understand that this is not a box-ticking exercise.

Indeed, comparing the CPSL's website with that administered by its Irish equivalent (Comirce, meaning "protection"), the CPSL website seems to lack the same fervour as that of its counterpart for its role as well as detail about what its purpose is (e.g. it is not clear what it will do to foster a culture of safety and care). Language is important and we would encourage CPSL to

employ similar language as Comicre in its website and work such as 'best practice'. We would also encourage CPSL to make its website more appealing to children and young people, like Comicre's more bright and engaging website.

Furthermore, from our research it is clear that the effectiveness of child safeguarding standards is enhanced by collaboration and the sharing of knowledge between organisations about practice and implementation approaches. Child safeguard standards should facilitate the development of a community of practice model across Catholic entities. This concept is not supported by these draft standards and is a gap that we believe needs to be addressed in the next iteration of these standards.

Purpose, indicators and outcomes of standards
In this draft of the standards, it is not clear what is the purpose of each standard, how each one will be measured and what will be the outcome if they are not met by an institution. We understand that Draft Three of the standards will further develop standard principle criteria, indicators and the implementation and evidence guide. However, we feel that in their current form there is a lack of detail in relation to each standard and their implementation, and that they are too vague in relation to how implementation will be measured (e.g. "adequately") and in relation to some of the terms used. To this latter point, we would like to see more terms defined in the glossary (e.g. such as Church personnel). Currently, the lack of detail makes it hard for readers to understand why and how each standard is relevant, what it means to their organisation and work and what are the repercussions if they are assessed as not meeting the standard in some way.

It is also not clear how regularly standards will be reviewed or when, how or where CPSL will publically report on its findings or how and when it will monitor an institution's efforts to meet standards it has failed. It is also not clear whether the team that will undertake standards' assessment will be independent from the CPSL, again, as are the team of 'Independent Reviewers' in the National Board for Safeguarding Children in the Catholic Church in Ireland. Assessors must be independent to ensure that their findings are and seen to be objective and unbiased from the CPSL who has made them and delivered training on them.

Complexity of the Church

Unlike the Truth Justice and Healing Council's submission to the Royal Commission, Draft One does not seem to adequately acknowledge the complexity of the Church and the many different types of institutions that sit under its broad umbrella. It seems that a one-size-fits-all approach has been taken to developing the standards and it is not clear how diverse institutions can meet them or how assessment of various institutions will differ to accommodate their diversity.

In our responses to the questions relating to each standard, we have provided our comments in relation to explaining how effective we think the standard is only and, to this end, refer to specific areas in each standard which we believe require more detail or refinement.

Standard 1: Committed leadership, governance and culture

1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?

Somewhat effective

1a. Please explain your response.

1.1.1. This clause determines that a Church entity should have a Child Safeguarding Policy but then states that this should be created at a Diocese or Congregational level, which does not recognise the diversity of Church institutions.

1.1.3. It is not clear in this clause for whom the Child Safety Commitment must be easily understandable and we would like to see specific reference to it being understandable to children and their families. This clause also does not recognise the communication needs of children and young people who have disabilities or of Indigenous children and young people, which we feel are important groups with whom the Church works.

1.2.2. We believe that it may be more appropriate to have a Safeguarding Committee at the highest level of Church leadership rather than one person to ensure that child safety is an issue embraced by every area of the Church. We feel that it is too much responsibility to reside in one leader and would be overly subjected to that leader's personality or enthusiasm for the role. There also needs to be more detail about this role, what is expected of it and how outcomes will be measured.

1.2.3. We believe that Safeguarding Coordinators, the entity and the Church more broadly would benefit from Safeguarding Coordinators formally collaborating with their peers in other institutions to help share best practice and gain a wider understanding of institutional abuse and its management.

1.2.5. yourtown would like to see more detail in this clause in relation to the recruitment, selection, orientation and training of contractors. Given the number and different types of

	<p>contractors that diverse Church entities work with, we are not sure how this standard would be overseen in practice or whether it is possible to put protocols and processes in place that are more than simply box-ticking and instead provide for improved child safety. We recommend that CPSL consider how to incorporate and measure situational prevention strategies in relation to this standard. Situational prevention strategies have been shown to be effective in the prevention of abuse to children and vulnerable adults in institutions.</p> <p>1.6. We would also like to see significantly more detail and robust steps set out in relation to this clause and 1.6.2 in particular. To effectively manage risk of Church staff working overseas or overseas visiting staff working in Australia, we need to see mechanisms in place for background checks and information-sharing about staff and full consideration about whether the countries Church staff visit and receive visitors from share common values regarding the protection of children, appropriately safeguard children, and know how to report and act on child safety issues.</p>
<p>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?</p>	<p>N/A</p>
<p>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</p>	<p>N/A</p>
<p>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?</p>	<p>N/A</p>
<p>Standard 2: Children are safe, informed and participate</p>	

<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</p>	<p>Somewhat effective</p>
<p>1a. Please explain your response.</p>	<p>2.2.1. We consider that reference to different roles in terms of bully, victim and bystander should be acknowledged and accommodated in this clause.</p> <p>2.2.2. Bullying in the workplace speaks to the culture of the organisation and this needs to be recognised in this clause. For this reason, we believe that this clause is too narrow in focusing on children bullying their peers as bullying occurs between adults, and adults and children and, if present, is behaviour which children can subsequently mimic.</p> <p>2.3. We would like to see reference and detail around how organisations should share information relating to risks and abuse, as part of establishing good working relationships between the Church and statutory child protection and prevention services but also other institutions that work with children.</p> <p>2.3.1. N.B. Kids Helpline is a service of your town.</p> <p>2.4. We would like to see this clause strengthened so that it reads that Church personnel “are attuned to risks and signs of harm” as we believe that it is imperative that staff know how to prevent harm rather than simply respond to it where it has been committed.</p>
<p>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?</p>	<p>N/A</p>

<p>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</p>	<p>N/A</p>
<p>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?</p>	<p>N/A</p>
<p>Standard 3: Partnering with families, carers and communities</p>	
<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</p>	<p>Somewhat effective</p>
<p>1a. Please explain your response.</p>	<p>3.1.1. yourtown’s Kids Helpline would not be able to meet this clause given the nature of the work it undertakes and that we ensure both the confidentiality and privacy of our clients. The clause also does not recognise that many of Australia’s most vulnerable children do not have families or even carers to whom they could look for this support. We are also concerned that this clause shifts the responsibility of care and support to families and carers, and away from the Church entity.</p> <p>3.5.We believe that the Church should be taking a leadership role not just in raising awareness but also in advocating for issues relating to child safety. We also consider the implementation and evidence guide elements are very narrow and unambitious, and that again, there needs to be a focus on promoting awareness about the risks of child abuse not simply signs of harm.</p> <p>3.6.We believe that this clause should be reworded to read: “The Church entity manages risks” as we believe its current focus is too narrow. We believe that this clause needs to consider unknown offenders too and hence refer to how the Church entity manages risk relating to them also. The implementation of this clause</p>

	<p>should also provide more detail as to how it can be achieved in practice (e.g. situational prevention) and reference to institutions undertaking risk assessments and creating managements plans should be made explicit.</p>
<p>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?</p>	N/A
<p>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</p>	N/A
<p>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?</p>	N/A
<p>Standard 4: Equity is promoted and diversity is respected</p>	
<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</p>	Somewhat effective
<p>1a. Please explain your response.</p>	<p>4.1. We would expect to see reference to not only the Church entity “recognising” and “respecting” diversity but also to it “accommodating” this diversity.</p> <p>4.3. We believe that the language in this clause needs strengthening so that the Church entity does not merely provide accessible information to children (which should also be tailored to different developmental needs) but rather it ensures that they access it and that it provides a</p>

	culture of information-sharing.
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?	N/A
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	N/A
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?	N/A
Standard 5: Robust human resource management	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Somewhat effective
1a. Please explain your response.	<p>5.1. We believe that this clause needs to be strengthened so that new recruits can demonstrate child safety skills and processes in their experience. The expected level of contact that staff have with children as referenced to in 5.1.2 should not be of concern but rather all staff be able to demonstrate child safe practices regardless of how often they come into contact with children. We would also like to see specific reference in this clause to not appointing staff until relevant recruitment checks have been completed.</p> <p>5.3.1. This is an area that we would like to see the Church review and develop a robust process to ensure that perpetrators cannot be moved from one location to another overseas within the Church. We would also like to see the Church</p>

	<p>working with Church entities overseas that embrace the same values and processes in relation to child safety as the Australian Catholic Church.</p> <p>5.4.1. It is not clear why safeguarding training should be conducted within 4 months after commencing duties at a Church entity. In addition, safeguarding training needs to be undertaken regularly not simply at induction.</p> <p>5.5.2. It would be helpful to define what is meant by 'professional supervision' in the Glossary.</p>
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?	N/A
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	N/A
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?	N/A
Standard 6: Effective complaints management	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Somewhat effective
1a. Please explain your response.	<p>6.2. This clause needs to specifically mention that the complaints procedure be child friendly and consider how this will be assessed.</p> <p>6.3.2. This clause needs to provide greater detail around the complaints procedure in relation to time frames and when this procedure will be evoked.</p> <p>6.4/5. These clauses need to be aligned so that</p>

	both complainants and respondents receive the same level of support from the Church entity. As they read currently, it appears that respondents would benefit from greater support than complainants.
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?	N/A
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	N/A
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?	N/A
Standard 7: Ongoing education and training	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Somewhat effective
1a. Please explain your response.	7.1. We would like to see this clause cover goals of training and there to be greater detail about methods and procedures around both the ability to identify risk and harm and report on risk and harm. 7.3. It is not clear how this clause is different from 7.2.
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?	N/A

3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	N/A
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?	N/A
Standard 8: Safe physical and online environments	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Somewhat effective
1a. Please explain your response.	<p>8.1. We would expect this standard to cover issues relating to pornography.</p> <p>8.1.2. We believe that it would be beneficial that children receive education in relation to what to expect from a confessional and what to do when they feel Church personnel have acted inappropriately in this setting.</p>
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?	N/A
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	N/A
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?	N/A
Standard 9: Policies and procedures support child safety	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Somewhat effective

<p>1a. Please explain your response.</p>	<p>9. We would like to see more detail and specific reference to the following areas about which Church entities should have policies:</p> <ul style="list-style-type: none"> • Child Abuse and reporting • Whistle-blowing • Overseas visits and visitors • Evidenced-based risk management <p>9.5. It is not clear how Church personnel will be assessed as having understood the policies and procedures.</p>
<p>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?</p>	<p>N/A</p>
<p>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</p>	<p>N/A</p>
<p>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?</p>	<p>N/A</p>
<p>Standard 10: Regular improvement</p>	
<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</p>	<p>Somewhat effective</p>
<p>1a. Please explain your response.</p>	<p>10.1. We would expect to see detail in relation to how often the Church entity is expected to review its child safeguarding practices in this clause.</p> <p>10.2.2. It would be helpful if processes were in place to identify what works well/best practice in relation to child safety identified through this analysis also and to share this learning.</p>
<p>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</p>	<p>N/A</p>

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?	N/A
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?	N/A