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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	Institute of Sisters of Mercy Australia and Papua New Guinea (ISMAPNG)
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?	Australian Capital Territory, New South Wales, Queensland, South Australia, Tasmania, 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	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	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

<p>4. I/we believe that the National Catholic Safeguarding Standards will reduce the likelihood of harm to children in Catholic entities.</p>	<p>Disagree</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>: The Institute of Sisters of Mercy of Australia and Papua New Guinea (ISMAPNG) is a community of Catholic Religious Sisters, in the Mercy tradition founded by Catherine McAuley. ISMAPNG has links to 19 separate ministry organisations across Australia and Papua New Guinea, providing education, health care and community services to the Australian and PNG communities.</p> <p>The Institute itself is a public juridic person of pontifical right and operates independently of dioceses and other church organisations in Australia. There are 780 Sisters of Mercy living in Australia and PNG at the present time. We have approximately 200 staff members working for the Institute in lay roles, providing support and administrative services. We also work in conjunction with approximately 11,000 ministry partners and over 3000 volunteers. We are therefore a large Catholic organization with a substantial community of religious members in active ministry and significant reach across education, health care and community sectors. We are a member of Catholic Religious Australia (CRA) and we endorse CRA’s overall response to the draft Safeguarding Standards.</p> <p>The CPS standards will apply to the Institute as a “church entity” and also through the Institute to its various and diverse ministries. This submission is therefore made on behalf of the Institute in its own right as the head entity but also on behalf of its ministries, each of which is separately incorporated. We have undertaken a survey and consultation process with our ministries to inform this submission and</p>

represent their views in this response.

ISMAPNG and its ministries support the introduction of the Safeguarding Standards and appreciate the consultation with CPS that we have had to date. The release of the draft Standards is an important step in the Church's commitment to accountability and transparency and we welcome this change. Also, the Royal Commission provided principles to guide future action and we can see the clear link back to the Commission's recommendations, taken one step further by way of practical guidance. Our following comments are therefore made in the spirit of building on the standards and improving their effectiveness, as well as pointing out some areas which may pose a challenge to implementation.

(a) Regulatory and Compliance landscape

Our first general comment is about the breadth of regulatory and compliance requirements already in place which apply to ISMAPNG and its ministries. In view of the multiplicity of our services and the diversity of the Mercy community, we welcomed CPS' recent announcement that recognises the impact of current regulatory and compliance process:

"In line with recommendations made by the Royal Commission, how CPSL practically measures compliance with the National Catholic Safeguarding Standards across the breadth of Church life and ministry will need to be varied and our intent is to avoid duplicating regulatory processes that parts of the Church may already be required to adhere to. Developing a detailed framework to ensure auditing of the National Catholic Safeguarding Standards takes account of, and builds on, other regulatory requirements will take time and refinement." (CPS newsletter

25 May 2018)

Our ministries have reported similar views and there is a wish to demonstrate compliance with the proposed Catholic Safeguarding standards by following the 10 standards and indicators but at the same time relying on 3rd party independent assessments and reviews that also have child safety at their core. If there is an opportunity to develop an attestation or certification process in the future that relies on compliance with concurrent frameworks in common areas, we would be interested in pursuing this with CPS further.

(b) Effectiveness

Our second general comment is about the overall effectiveness of the Safeguarding Standards. Whilst there is undoubtedly a need to develop standards which work in the Catholic context and restore trust in Church organisations to maintain child safety, there is an emphasis in the standards on demonstrating that policies, practices and initiatives are in place. There could be an assumption that, by virtue of these things, child safety will be guaranteed.

We think there is a difference between outputs and outcomes that needs to be understood to arrive at a true understanding of effectiveness. We suggest additional guidance be provided on how to measure the effectiveness of the standards in an organisation over time. This is also linked to the need for strong leadership and culture within institutions and this is an area keenly supported by our ministries, many of whom already work with children at risk and vulnerable people. If there is guidance that can be provided on evaluating the effectiveness of the standards, we think this would be of

enormous assistance to organisations and their governing bodies.

(c) Applicability

Our final general comment is that the standards, indicators and implementation and evidence guide have a prescriptive nature and do not appear to cater for organisations which have very minimal interaction with children. Comment on these areas is made in detail under each standard below, but it is worth recommending at this point that we think a better approach may be to mandate the Criteria and Indicators and make it clear that the Implementation and Evidence Guide is guidance only. Organisations can therefore take a more principled approach to the implementation of the standards based on their own risk profile. We have heard from our stakeholders that there is a degree of confusion over whether all the details in the standards, indicators and evidence apply in equal measure.

Also, in organisations like ISMAPNG where the church entity has ties with ministry entities, it is not yet clear how the auditing framework will apply to this type of structure. It would be helpful to have guidance that indicates whether audits will only be conducted within the church entity or whether evidence of compliance will be sought from affiliated ministries. In terms of record keeping, availability of staff and preparation for future audits, this has substantial time and resource implications for us and further guidance would be appreciated.

Standard 1: Committed leadership, governance and culture

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

Effective

entities?	
1a. Please explain your response.	The Standards need to be communicated in a simple and effective way. The challenge of the standards will be to develop appropriate levels of detail at various levels within each organisation. The format of listing the standard then listing Indicators and the Evidence Guide is an excellent format for 'layering' what various levels in an organisation might need to work with in their own role.
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?	The Standards document contains a great deal of detail, yet this will be well beyond the needs or ability of many staff to understand or apply. If people are presented with more information than they can handle, there is a temptation to ignore the whole document, and this would be tragic in the current environment. Those in governance and leadership, and in management positions need to grapple with the complexity of the standards, and this will take them some time to do. As well, the organisation overall will need to ensure effective and efficient coordination and internal communications so that the standards become part of the daily life and culture of the organisation. This will take time and a strong commitment to improve the care and protection of all, especially children and vulnerable persons.
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	Small organisations will struggle with allocating resources to this and there is a possibility that this will detract from other important ministry priorities.
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?	The roles of Safeguarding Trustee/Champion and Safeguarding Coordinators need to be further defined and understood in relation to existing roles and approaches. In many organisations these roles may not be needed but it is not clear from the standards whether this is a flexible requirement.
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?	Somewhat effective
1a. Please explain your response.	Including children in the development of policy etc is not something we have historically done and it will take time to develop capability in this area. Some organisations see merit in using a third-party accreditation agency to review but this is not universally done.
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?	There are big differences across all ministries in experience of working with children and particularly children at risk. The main challenge will be changing mindsets among staff, clergy, etc., to truly listen to the input and needs and wisdom of all, including families and vulnerable or disadvantaged people, who may not be as articulate as the voices we usually listen to.
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	none identified
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?	none identified
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.	Ensuring that consultation is encouraged from family members who have not generally been involved with other church matters will be crucial. It is very important to get views and input from people outside of the normal engagement group.
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?	It may be valuable to cross-reference legislative requirements in relation to child safety and reporting conduct. It doesn't appear that these obligations are referred to at any point through the document. The standards are high, and for many Church agencies, will require a

	collaborative approach that is new to them yet which actually conforms with sound ecclesiology.
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	For many Church entities, this standard will require a very different approach to how they work with clients and their communities. Historically the Church has had a 'top down' approach where clergy in particular carry decision-making authority. This standard will require far more consultative and collaborative engagement with communities and clients - a good thing in all ways.
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?	none identified
Standard 4: Equity is promoted and diversity is respected	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	The main issue will be consulting with members of diverse groups within the community to contribute to policy development. Also, there will be a need to make information age-appropriate and take into account language and literacy issues. This includes re-writing documents which are more inclusive and representative of the children in our schools, for example. This is a positive standard as it provides direction to engage those not in the mainstream, and provides clear direction in an area not practiced to date.
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?	The resources required by organisations to implement this Standard in a universal way
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these	none identified

Standards?	
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?	none identified
Standard 5: Robust human resource management	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Needs improvement
1a. Please explain your response.	Much of this standard relates to clergy and religious. While this is where most historic offending has occurred, in the future it needs to cover all involved in church life, including those involved as volunteers or as staff. However, it provides a robust framework for the screening, recruitment, assessment and management of personnel and appropriately acknowledges the importance of regular professional supervision. There will be a need to ensure all the leadership structures are fully supportive of all these requirements and don't just 'tick a box'.
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 below
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	In section 5.6, further consultation with church authorities is needed as the suggested measures for psychological and psycho-sexual assessments are quite simplistic. On entering religious ministry a psychosexual assessment is generally performed to ensure that a candidate is suited to religious life and celibacy. However, once that person enters into a supervision relationship with an accredited supervisor (which would be our recommendation) issues of this nature can be explored and assessed within a process of reflection and careful discernment.

	The standard seems to require a repeated series of external psycho-sexual assessments which in our view would be unduly onerous.
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?	With respect to section 5.7, we consider further country-specific guidance would be of benefit to those church entities with overseas ministries and the human resource management practices that should apply. In countries such as PNG and Timor Leste, Working with Children Checks and even police checks may not be available, as the government infrastructure to provide birth records or screening processes simply does not exist. There need to be other methods developed to build human resource management practices, in keeping with local cultures.
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.	This standard is critical as robust, transparent and monitored complaints processes (integrated with risk management processes), incident frameworks, other feedback and performance development frameworks are key to managing issues.
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?	Specific child safety issues will need to be addressed to build upon existing protocols and to be age appropriate and child friendly. Protocols need to outline step by step guidance on action in relation to an allegation or suspicion of child abuse. Record keeping of such complaints, incidents, allegations, suspicions and referrals needs to be developed, be secure and retained indefinitely. Assessment and documentation of the level of immediate risk and resulting safeguards implemented needs to be part of the formal process

<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>Having a culture which allows the complainant the freedom to have the courage to come forward and appropriate pastoral care should be acknowledged in the standard.</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>Having an external third party to manage complaints via a hotline or similar means should be considered, in order to reassure those we serve that any real or perceived conflict of interest is eliminated or minimised. The external provider will then be a strong source of best practice and advice well into the future as abuse moves from children to vulnerable adults - aged and disabled.</p>
<p>Standard 7: Ongoing education and training</p>	
<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</p>	<p>Effective</p>
<p>1a. Please explain your response.</p>	<p>The strength of this standard is that it covers both initial training and refresher training, which is critical. If Safeguarding Coordinators are appointed, consideration should be given to whether these should be approved or accredited by an external body other than the Catholic Church.</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>see below</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>Effectively embedding child safety will require a range of learning and development initiatives that reflect the nature and focus on Church entities. For example, the need of an entity working at the tertiary end of the children protection area will be different from the needs of a parish. The regular/annual training requirement for staff and the need for this to be delivered by a person suitably qualified requires considerable resource investment.</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?	none identified
Standard 8: Safe physical and online environments	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	The maintenance of child safe online environments is a challenge for many organisations. While online connection can be a protective space for children, the challenges associated with staff competence and understanding, the widespread availability of mobile technologies, the availability of wifi, the proliferation of pornography and other harmful online content can make online safety a significant challenge for organisations working with children. It is an area where policy and protocol is constantly playing catch up to practice. It is also an area where partnering closely with parents and families is important and is linked to the guidance in Standard 3.
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?	none identified
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	none identified
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?	none identified
Standard 9: Policies and procedures support child safety	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic	Needs improvement

entities?	
1a. Please explain your response.	The policies and procedures developed by organisations ought to be available, not only to Church Personnel but should be publicly available to ensure accountability and transparency. Further, policies and procedures are only effective if implemented appropriately and embedded into the culture. Practices will need to be evaluated and assessed against standards to provide some level of assurance. Equally this should identify gaps in practice from policy and/or gaps in policy direction and the achievement of the required standard. In section 9.4, consideration should be given to linking accountability for breaches of policy to the Church Authority and leadership team.
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?	There needs to be rigour around evaluating the effectiveness of policy and procedures, in line with our general comments above. Practices need to be assessed against policy and procedure to check whether they are in line with intent and best practice. Gaps or examples where policy and procedure work as designed but risk is not reduced can then be identified
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	as 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?	Some sectors advise that the term ‘whistle blowing’ is too colloquial & should be replaced by protected disclosure (as defined in the Protected Disclosure Act 2013) which may be a more appropriate term.
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.	This Standard takes policy to an annual action plan type of process which is commonly used as

	<p>part of strategic planning and risk management processes in our ministries. It also identifies resource allocation as a priority for a church entity, and provides strategies to manage risk and determine systemic problems.</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>The mindset that, once all the required procedures and training are in place, an organisation can 'tick the box' as having done what is needed, is dangerous. Those responsible for overseeing a review of the safeguarding standards and improvement work will often need to exercise strong leadership to ensure this task is taken seriously. Root causes and systemic failures should be carefully investigated, analysed and change implemented as needed. Consideration should also be given to an organisation publishing its action plan and outcomes as a further sign of transparency.</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>as above</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>as above</p>