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Come-back-Later Code	AGK3R7WAHH
1. Is this an individual response or are you officially responding on behalf of an organisation?	Individual
3. Please indicate your stakeholder group(s) :	Parishioner, Professional, Church volunteer, Community member, Other (please specify): Church personnel
8. Please select the state(s) and/or territory(s) you are based in?	Prefer not to say
Do you consent to your identifying details being published, in addition to your responses, on the CPSL website?	No, I do not want my identifying details published
General feedback relating to the Standards	
1. The National Catholic Safeguarding Standards are: - Easy to understand	Disagree
1. The National Catholic Safeguarding Standards are: - Presented in a logical manner	Strongly agree
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.	Disagree
4. I/we believe that the National Catholic Safeguarding Standards will reduce the likelihood of harm to children in Catholic entities.	Agree

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 concerns raised in these comments are not intended to criticise or impede the work of CPSL; we all have the common goal of safeguarding children: it is at the very core of the mission of the Church. But this will best be done in a way that is faithful to the Church's teaching and mission, and not in opposition to it. It is to this point that these comments relate.

A lot of the language in the standards is vague. For example, the frequent use of words like "respectful," "supportive," "open" can be interpreted in many ways, and so is unhelpful and leaves the Church Authority vulnerable to the view of the particular auditor.

In some areas, the standards appear to override the Towards Healing process, but do not set out a precise, alternative process for complaint handling.

There is no reference to how these standards will interact with the redress scheme. Specifically, the redress scheme uses a 'reasonable likelihood' standard of proof, which is lower than the 'balance of probabilities' one proposed in the safeguarding standards. What is to be done with someone in active ministry who is found to have met the lower 'reasonable likelihood' standard of proof used by the redress scheme but not by the higher 'balance of probabilities' standard used in the safeguarding processes? Has anyone addressed this?

The Royal Commission recommended there be no difference between the treatment of clergy and laypeople with respect to codes of conduct and investigations (recommendations 16.49 and 16.54), but many of these standards apply unequally and require greater compliance measures to be applied to clergy. How is this

justified?

Concerns about 'accountability'

The Preamble states that CPSL will: "hold accountable the leaders and members of the Catholic Church entities and organisations for the safety of children and vulnerable adults who come into contact with the Church and its works."

While the preamble doesn't state how leaders and members of the Church will be held accountable, there is a reference to publicly reporting audit findings, so it appears that this is the main source of 'accountability.' The use of public pressure in accountability is consistent with what was said in the media release when CPSL was launched:

"Catholic Professional Standards will not have the jurisdiction to force any Church authority to implement any recommendations. However, Catholic Professional Standards can and will publish regular reports and listings on the Catholic Professional Standards website and in other ways make it known that a particular Church authority has failed a national professional standards audit. THE INFLUENCE WHICH CATHOLIC PROFESSIONAL STANDARDS WILL HAVE OVER ANY CHURCH AUTHORITY WILL BE THROUGH PUBLIC ACCOUNTABILITY."

[Emphasis added.]

This overarching threat is deeply concerning because, instead of encouraging a sense of openness amongst those to whom these standards pertain, it instils a sense of fear that public pressure will be brought to bear on those who express any objection to these standards.

There is a sense that the raising of legitimate concerns about the practical application of these standards or their occasional conflict with Church teaching and sacramental practice will be looked upon as the ‘clericalist’ mindset so heavily criticised throughout the course of the Royal Commission.

The fear of negative media attention was one of the key causes of the historic cover up of child sexual abuse in the Church. I submit that the solution to this is not once again using fear as a motivating factor in compliance.

Re the glossary: The definitions of ‘ministry’ and ‘pastoral ministry’ need to match the definitions understood by the Church. For example, pastoral ministry is the exercise of ministry by pastors, ie the clergy.

Standard 1: Committed leadership, governance and culture

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

Effective

1a. Please explain your response.

See below.

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?

Having a governance structure that is linked largely to ordination has meant that many people believe that matters, including child safeguarding, are the responsibility of the Bishops. The key opportunity provided by this standard, and by the National Catholic Safeguarding Standards, is a reminder to all members of the Church, including the laity, that child safeguarding is the responsibility of all of us.

3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?

Criteria 1.2

The Implementation and Evidence guide includes publishing “an organisation chart which shows lines of authority, reporting and accountability for each position in the entity, supported by duty statements/performance agreements which address child safety.” No other organisation that I know of publishes organisational charts for its staff. It is not appropriate to reveal that level of information about employees, particularly when there is no discernible value in upholding child safety by publishing such a chart. As long as there are clear contacts for complaints to be made, the publication of organisational charts is not required.

NB: this is replicated in Criteria 3.4.

Indicator 1.3.3

This states that a Code of Conduct for Church personnel should include “guidance to Church personnel makes it clear that discriminatory behaviour or language in relation to any of the following is not acceptable,” and includes, among other things, religion, sexuality and political views. It is unclear what the policing of language about this has to do with the safeguarding of children and is, I submit, an overreach in the jurisdiction of CPSL.

There is the possibility that such a standard could be used to push ideological viewpoints, depending on who gets to judge if language is discriminatory. For example, last year’s same-sex marriage plebiscite involved some members of the Church speaking publicly and forcefully about the truth of the nature of marriage as being between a man and a woman. At other times, it will be appropriate to express teachings about

	<p>the truths of the Catholic faith that could be labelled as ‘discriminatory’ against other religions, or to make comments on political matters that could be seen as ‘discriminatory’ against political views. The potential characterisation of these as child safeguarding matters could be used as a penalty against those who seek to uphold the Catholic faith in the public square.</p> <p>I recommend this indicator be removed.</p> <p>Criteria 1.6.1</p> <p>This requires that all participants in a cultural immersion, pilgrimage or solidarity campaign attends child safeguarding training. Can it be clarified that all those who attend faith-based pilgrimages need to go to safeguarding training, even when they are simply doing so as a member of the lay faithful and when children are not in attendance?</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>None that come to mind</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>See below</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 challenge is to keep children informed without overloading them with information about sexual matters from a young age; there is a risk that this will done in a way that does not protect their innocence, which is part of ‘safeguarding’ children. The key opportunity is that it could encourage children to not report issues in their own lives, but potentially risks of harm to their peers.</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>Criteria 2.1.1</p> <p>The criteria requires that “the Church entity includes the views of children in the development of safeguarding policies, strategies and when making decisions.”</p> <p>It is not clear how this will be achieved practically. The depth of understanding of child abuse issues and risk factors that would be beneficial in the development of standards and safeguarding policies would be inappropriate for children. Safeguarding children surely requires a respect for the innocence of children.</p> <p>Criteria 2.2.3</p> <p>The Implementation and Evidence guide includes that a policy for unacceptable behaviour that provides mechanisms to deal with punishment for children that is “physical, degrading or humiliating.” The use of vague descriptors like “degrading” or “humiliating” is concerning. Would school teachers be concerned about disciplining students because parents or students would be able to point to correction as “degrading” or “humiliating”? Subjective, value-laden phrases such as these will be an obstacle to the implementation and achievement of compliance with these standards.</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>None that come to mind</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>Effective</p>
<p>1a. Please explain your response.</p>	<p>See below.</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 key challenge is that a number of parents might be sceptical about partnering with the Church in matters of child safety; there has been so much said about a lack of safety of children within Church institutions that restoring the trust between parent and Church will take some time. The key opportunity provided by the National Catholic Safeguarding Standards is that they encourage both parents and those involved in other aspects of the Church to seek to close this divide for the sake of children.</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>Criteria 3.4</p> <p>Please see comments under Indicator 1.1.1 about publication of organisational charts.</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>None that come to mind.</p>
<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>	<p>Needs improvement</p>
<p>1a. Please explain your response.</p>	<p>See below.</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>A standard that looks to promote equity and diversity does not necessarily have anything to do with children. There is a risk that this standard will encourage ideological, rather than child-centred, action.</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>Criteria 4.1</p> <p>The Implementation and Evidence Guide requires the Church entity “recognises and respects children with diverse backgrounds, identities, needs and preferences, including... the experiences of LGBTI children.”</p> <p>Similar to the concern raised about Indicator 1.3.3, the vague language of ‘recognition’ and ‘respect’ could serve not to protect children, but rather to challenge Church teaching on sexuality. Subjective judgment against this standard by a person who does not agree with the Church’s teaching could lead to a person being sanctioned on ideological grounds. For example, could a school teacher who opposed a child transitioning gender find himself or herself subject to a substantiated complaint under this criterion?</p> <p>Criteria 4.2</p> <p>The Implementation and Evidence Guide requires the Church entity to strive “for a workforce that reflects diversity of cultures, abilities and identities.” A more appropriate standard would aim to reflect the needs of the children being ministered to in the workforce dealing with them. A generic statement about diversity quotas is too broad, and again, somewhat ideological.</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>None that come to mind.</p>
<p>Standard 5: Robust human resource management</p>	
<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</p>	<p>Needs improvement</p>
<p>1a. Please explain your response.</p>	<p>See below.</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>Indicators 5.1.3 and 5.1.5</p> <p>The Implementation and Evidence Guide suggests involving children and families in recruitment for Church personnel and for candidates for Priesthood and religious life, although it is unclear how this would be beneficial. It would more likely be non-beneficial because it would lead to a no-win situation. If you give the opinion of a child equal weight to the opinion of the adults in relation to a candidate, it could have ridiculous results. For example, I have a nephew who for many years took a dislike to anyone with a shaved head; he did not realise that is the source of his dislike, but would describe them as ‘scary.’ What benefit would his view have been to an interview panel? If you gave the child’s opinion little or no weight as compared to the adults making the decision, it would demonstrate that the standards are giving the veneer of consultation only. Either way, the standard is ineffective.</p> <p>Indicator 5.5.2</p> <p>This requires that “all people in religious or pastoral ministry, including bishops, provincials, leaders, superiors, clergy, religious, overseas Church personnel and lay personnel, undertake required professional supervision.” The Implementation and Evidence Guide goes on to speak about the supervision being provided by “a trained and skilled professional, who may in some circumstances have a degree of independence from the entity.”</p> <p>It is not clear where the huge number of professional supervisors this would require will</p>

	<p>be sourced from, and how they will be funded, or even what qualifications they would require to undertake this role. It is also unclear why someone with a degree of independence from the Church would be suitable for this type of role. It is one thing to have people who are a little separated from the 'institution,' but surely their effectiveness will be limited if they do not have a proper understanding of the ministry of Catholic clergy, religious and lay ministers. It would make no sense for a lawyer to be supervised by someone who had never studied or practiced law; why would it be appropriate in ministry?</p> <p>Indicator 5.7.1</p> <p>The Implementation and Evidence Guide states that pastoral ministry for clergy and others from overseas initially be for a period of two years only. Unless incardinated in a diocese, those who come from overseas to Australia for pastoral ministry are able to be sent elsewhere by the Church Authority at any time. Creating a two-year 'probation' period is therefore unnecessary, and would only serve to create instability for both the person involved and the people to whom they minister.</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>None that come to mind.</p>
<p>Standard 6: Effective complaints management</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>See below.</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>See below.</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?	<p>Indicator 6.2.1</p> <p>Similar to comments made under Standard 2, requiring children to be involved in the design of a complaints handling process could require such a child to have knowledge of matters inappropriate for children. Safeguarding children surely requires a respect for the innocence of children.</p> <p>Criteria 6.3</p> <p>It is not clear that some of the proposals made under this criterion accord with Canon Law; and creating a conflict between the standards and Church law is not advisable. The Royal Commission has asked the Church to seek advice on this from the Holy See. CPSL should not pre-empt this advice.</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 that come to mind.
Standard 7: Ongoing education and training	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	The formalising of training is a good idea, so everyone knows what is expected.
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 key challenge is providing meaningful content for ongoing education and training. The key opportunity is the ability for different areas of Church life to collaborate on content.
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these	See above.

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 that come to mind.
Standard 8: Safe physical and online environments	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Needs improvement
1a. Please explain your response.	See below.
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 key challenge is that these standards seem to operate in a way that conflicts with the Church's sacramental life.
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	<p>Indicator 8.1.1</p> <p>The Implementation and Evidence Guide requires that “living areas for clergy and religious must be clearly separated or delineated from publicly accessible areas such as offices and meeting rooms.” This would require a redesign of many existing presbyteries, but no thought has been given to the practicality, cost and time requirement for this request, or if it is even the most practical way to safeguard children. The guidelines would be improved if there was some ability to consider practical measures in existing presbyteries that might have office space in close proximity to living areas.</p> <p>Indicator 8.1.2</p> <p>It goes without saying that a requirement for all confession to be held with adult supervision and the suggestion that a Priest should turn away a child penitent if no adult supervisor is present is problematic. A child has a right to privacy, and to have their confession heard upon reasonable</p>

	<p>request. These rights cannot be denied a child. Speaking personally, as a teenager, I would have simply refused to go to confession if I could not do so anonymously, or if I had to be within the line of sight of an adult. Confession is a private encounter between the penitent and God, and this must not be interfered with. This particular standard would have the devastating effect of decimating the practice of confession amongst the young, and so should be withdrawn.</p> <p>There are other ways (eg fixed grilles) to protect both the safeguarding of children and the rights of the penitent, be they child or adult, that does not infringe upon the rights of anyone.</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>I have heard feedback from some clergy that they are concerned they will be audited – either by the state or by internal church bodies – about how they conduct confessions or with children requesting their confession be heard. Given how seriously priests and penitents take the sacrament of reconciliation and the need for the priest to be focussed on the penitent and nothing else, I request that CPSL publicly commits that confession will never be the subject of a ‘mystery shopper’ style audit.</p>
<p>Standard 9: Policies and procedures support child safety</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>The formalisation of policies and procedures mean that everyone knows what is expected.</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 complex nature of these standards, as well as the individual policies and procedures that will be developed by orders, dioceses, schools and agencies to comply with the standards, are so unwieldy that compliance could be difficult.</p>

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?	None that come to mind.
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.	Continuous improvement is always good.
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?	Challenge is to keep on top of latest research/best practice and communicate this effectively.
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?	None that come to mind.