

<b>Submitted Date</b>	07-Jun-2018 12:04
<b>Total Time Taken</b>	1931.14
<b>Come-back-Later Code</b>	LBX72DC64G
<b>1. Is this an individual response or are you officially responding on behalf of an organisation?</b>	Catholic entity
<b>4. Please provide the name of the Catholic entity you are officially responding on behalf of</b>	Archdiocese of Canberra and Goulburn
<b>5. Please indicate the type of Catholic entity you are officially responding on behalf of</b>	Archdiocese
<b>6. Please indicate the approximate number of Church personnel affiliated with your organisation</b>	1001 - 5000
<b>8. Please select the state(s) and/or territory(s) you are based in?</b>	Australian Capital Territory, New South Wales
<b>Do you consent to your identifying details being published, in addition to your responses, on the CPSL website?</b>	Yes, CPSL can publish my identifying details
<b>General feedback relating to the Standards</b>	
<b>1. The National Catholic Safeguarding Standards are: - Easy to understand</b>	Agree
<b>1. The National Catholic Safeguarding Standards are: - Presented in a logical manner</b>	Agree
<b>1. The National Catholic Safeguarding Standards are: - User-friendly</b>	Agree
<b>1. The National Catholic Safeguarding Standards are: - Consistent and accurate in their use of terminology</b>	Agree
<b>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.</b>	Agree
<b>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.</b>	Agree

<p><b>4. I/we believe that the National Catholic Safeguarding Standards will reduce the likelihood of harm to children in Catholic entities.</b></p>	<p>Agree</p>
<p><b>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.</b></p> <p><b>5. General/Overall comments on the National Catholic Safeguarding Standards</b></p>	<p>The standards do create conditions that will reduce the likelihood of harm to children in Catholic entities, will increase the likelihood of identifying and reporting harm to children and will facilitate appropriate responses to allegations and suspicions of harm. However, there is a concern that the implementation and evidence guide is so detailed that compliance will be significantly onerous.</p> <p>The implementation and evidence guide for all draft standards is said to contain “suggestions, examples and requirements for how a Church entity may demonstrate compliance with the indicators, criteria and, ultimately, each Standard” (Consultation Draft, p4). The word “requirement” is inapt here. A guide is more than a guide if its content is mandatory in some way. Furthermore, given the breadth of what is set out in the guide, it cannot be intended that Church entities must have in place everything that is set out in the guide. The resources of even relatively well-off dioceses and religious institutes would not run to implementing everything in the guide. The standards should contain some wording to make it clear that dioceses or religious institutes may demonstrate compliance with a standard otherwise than by complying with the indicators set out in the standard. Otherwise the standards run the risk of being overly burdensome. To ensure national consistency and to avoid duplication of effort and reduce Diocesan costs, we encourage CPSL where appropriate, to develop policies, resources and training materials to be implemented by Dioceses.</p> <p>It is also unclear as to the status of Towards</p>

	<p>Healing and its relationship with these proposed standards (particularly in the management of complaints) and with the decline in the number of complaints through Towards Healing, the ongoing role of State Professional Standards Offices. Towards Healing provided a nationally consistent approach to the Church's national complaint handling process. CPSL needs to provide some direction as to what dioceses and religious institutes are expected to do in the management of the responses to complaints.</p>
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**Standard 1: Committed leadership, governance and culture**

<p><b>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</b></p>	<p>Effective</p>
<p><b>1a. Please explain your response.</b></p>	<p>Refer to our general/overall comments.</p>
<p><b>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?</b></p>	<p>Refer response to question 3</p>
<p><b>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</b></p>	<p>The expectation that all elements as outlined in the implementation and evidence guide are to be implemented.</p>
<p><b>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?</b></p>	<p>The implementation and evidence guide relating to indicator 1.1.1 states that the reporting obligation under the Child Safeguarding Policy is to include reporting to the civil authorities of “all current child protection concerns”. The language here is too broad. It needs to be altered to align more closely with the language of the reportable conduct schemes and mandatory reporting schemes in Australia.</p>

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

<p><b>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</b></p>	<p>Effective</p>
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<b>1a. Please explain your response.</b>	Refer to our general/overall comments.
<b>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?</b>	This standard requires the development of significant resources. Implementation could be assisted by resources that are developed centrally (by CPSL?).
<b>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</b>	The expectation that all elements as outlined in the implementation and evidence guide are to be implemented (refer overall comments).
<b>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?</b>	
<b>Standard 3: Partnering with families, carers and communities</b>	
<b>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</b>	Effective
<b>1a. Please explain your response.</b>	Please refer to general/overall comments.
<b>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?</b>	Please refer to general/overall comments.
<b>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</b>	Please refer to general/overall comments.
<b>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?</b>	Please refer to general/overall comments.
<b>Standard 4: Equity is promoted and diversity is respected</b>	
<b>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</b>	Effective
<b>1a. Please explain your response.</b>	Please refer to general/overall comments.

<p><b>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?</b></p>	<p>Please refer to general/overall comments.</p>
<p><b>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</b></p>	<p>The development of accessible information in multiple formats while supported could be costly. Again these types of resources are best developed centrally for use by all. Another challenge is the expectation that all elements as outlined in the implementation and evidence guide are to be implemented (refer overall comments).</p>
<p><b>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?</b></p>	<p>Please refer to general/overall comments.</p>
<p><b>Standard 5: Robust human resource management</b></p>	
<p><b>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</b></p>	<p>Effective</p>
<p><b>1a. Please explain your response.</b></p>	<p>Please refer to general/overall comments.</p>
<p><b>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?</b></p>	<p>Where candidates in a seminary come from several dioceses, it is not clear how obligations about the content of seminary training could properly attach to an individual bishop.</p>
<p><b>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</b></p>	<p>The expectation that all elements as outlined in the implementation and evidence guide are to be implemented.</p>
<p><b>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?</b></p>	<p>Please refer to general/overall comments.</p>
<p><b>Standard 6: Effective complaints management</b></p>	
<p><b>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</b></p>	<p>Effective</p>

<b>1a. Please explain your response.</b>	Please refer to general/overall comments.
<b>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?</b>	A key challenge is that the protocol and procedures are “age appropriate and child friendly” as compliance indicator 6.1.1 requires. It would be helpful if an age appropriate and child friendly complaint handling protocol and procedures were developed centrally (by CPSL?) for use by all dioceses.
<b>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</b>	A fundamental issue with this standard is how it relates to Towards Healing. Towards Healing is not mentioned anywhere in the Consultation Draft, yet it is the protocol which all dioceses (apart from the Melbourne Archdiocese) and religious institutes have signed up to. Towards Healing provides a nationally consistent complaint handling process.
<b>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?</b>	Please refer to general/overall comments.
<b>Standard 7: Ongoing education and training</b>	
<b>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</b>	Effective
<b>1a. Please explain your response.</b>	Please refer to general/overall comments.
<b>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?</b>	A key challenge will be the development of the different training materials and resources required. To ensure consistency and to assist with this challenge it would be helpful if these were developed centrally (by CPSL?) for use by all dioceses.
<b>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</b>	The expectation that all elements as outlined in the implementation and evidence guide are to be implemented (refer overall comments).
<b>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?</b>	Please refer to general/overall comments.

<b>Standard 8: Safe physical and online environments</b>	
<b>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</b>	Effective
<b>1a. Please explain your response.</b>	Please refer general/overall comments.
<b>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?</b>	Please refer general/overall comments.
<b>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</b>	The expectation that all elements as outlined in the implementation and evidence guide are to be implemented (refer overall comments).
<b>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?</b>	Please refer general/overall comments.
<b>Standard 9: Policies and procedures support child safety</b>	
<b>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</b>	Effective
<b>1a. Please explain your response.</b>	Please refer general/overall comments.
<b>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?</b>	Please refer general/overall comments.
<b>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</b>	The expectation that all elements as outlined in the implementation and evidence guide are to be implemented (refer overall comments).
<b>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?</b>	Please refer general/overall comments.
<b>Standard 10: Regular improvement</b>	
<b>1. How would you rate this Standard in relation</b>	Effective

to safeguarding children from harm in Catholic entities?	
<b>1a. Please explain your response.</b>	Please refer general/overall comments.
<b>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?</b>	Please refer general/overall comments.
<b>3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?</b>	The expectation that all elements as outlined in the implementation and evidence guide are to be implemented (refer overall comments).
<b>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?</b>	Please refer general/overall comments.