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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	Diocese of Wollongong
5. Please indicate the type of Catholic entity you are officially responding on behalf of	Diocese
6. Please indicate the approximate number of Church personnel affiliated with your organisation	1001 - 5000
8. Please select the state(s) and/or territory(s) you are based in?	New South Wales
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	Disagree
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.	Disagree
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

<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 reason that we have answered 'disagree' above is that we are concerned that these generic questions are not helpful in this consultation process. Having the 'National Catholic Safeguarding Standards' will not in themselves render the statements provided at (2)-(4) inclusive true. There is a risk that there will be too much comfort taken in promoting the 'Nations Catholic Safeguarding Standards' as in themselves creating child safe organisations. The questions suggest that this could be the case.</p> <p>We have structured our response by making some overarching comments and then provided headings with comments which coincide with the headings used in the CPSL Consultation Draft.</p> <p>A) Relationship with various external standards We note in the preamble on the CPSL website that it refers to the release of the Royal Commission's Child Safe Standards, as well as the Human Rights Commission National Statement of Principles which are currently undergoing a consultation process in respect of the application of the Royal Commission's Child Safe Standards. It would be important this is clearly set out in the document to enable stakeholders to understand the intersection and relationship between the Standards, the Royal Commission's Child Safe Standards, the Human Rights Commission National Statement of Principles and other State based Standards. It is also important for the document to provide a rationale and guidance for Catholic organisations in terms of why and how they need to distill all three (and for some, more) components and the importance of engaging actively with community</p>

and government in this space. The Standards need to be constructed in a way that will keep children in our Catholic organisations safe and be of a consistent high quality of substance and drafting.

It is critical that there is no possibility that the Catholic sector could be perceived as doing 'its own thing' while other authorities align their language and content more closely with what the Royal Commission has released. This is an opportunity for the Catholic Sector to be recognised as fully engaging with and being supportive of the 'universal' standards set by the Royal Commission. We seek clear confirmation and assurance that by adhering to/implementing the CPSL final Standards that we are assured of being consistent and compliant with the Royal Commission's Child Safe Standards and the Human Rights Commission National Statement of Principles (and State Standards). The current language is not sufficiently clear about this.

B) Structure of the CPSL Consultation Draft

The CPSL Consultation Draft (the document) sets out the National Catholic Safeguarding Standards (the Standards) with: Criteria; Indicators; and the Implementation and Evidence Guide (the Implementation Guide). It is important at the outset that the document clearly explains the distinction between these Standards and the further three components and the purpose, scope and required level of compliance with each of these components.

The document reads as though every Indicator and every point listed in the Implementation Guide must be complied with. While we have been told that the Implementation Guide merely sets out examples of ways in which a Church Authority may comply with the Standards, the document does not read in this way. It reads as an attempt to detail a comprehensive

prescription as to how Catholic Church authorities implement the Standards. This inconsistency between what we have been told and what is written in the document is confusing and clarity would be useful.

We suggest that you separate the document into two documents. The first document would be the mandatory Standards with Criteria and the second document would be the non-mandatory Indicators and Implementation Guide. We believe that the Indicators should not be mandatory as they are not risk specific to an organisation – we provide further comment on this aspect below.

An additional reason to support the separation of the document is your advice that the evidence guide will be continually updated to provide suggestions whereas the Standards and Criteria would not be regularly changed. We suggest that using the terms Indicators and Practice Guide would be more helpful than Indicators and Implementation and Evidence Guide. We do understand that examples are helpful for some organisations, however, it must be clear that these are examples only.

C) Appropriate applicability of Standards/Indicators

As drafted, the mandatory Indicators are too prescriptive. If, as CPSL advises, all the Indicators apply to every organisation, the Indicators are not appropriately responding to the risks of a particular organisation. As an example, in an organisation of 2 to 4 people who have no contact at all with children, having both a Safety Champion and a Safeguarding Coordinator as an example does not address the level of risk to children within that organisation. Such a prescriptive requirement risks setting up roles and responsibilities that are not attainable, or in practice do not in any real way assist the protection of children. There is also a risk that it

may lead to the creation of more structures within organisations (possibly creating a culture of form over substance) rather than addressing risk and producing real benefit/outcomes.

There is a concern that because of the level of detail in the mandatory Indicators, the focus may be on 'ticking the box' rather than encouraging an organisation looking at their own organisation and seeing what steps need to be taken for that particular organisation to meet the Standards and Criteria. This concern would be reduced if the Standards and Criteria only were mandatory and the Indicators and Implementation Guide used to assist organisations.

Some Indicators include the words 'appropriate to the context'. This is useful and appropriate. It is unclear why this appears in some Indicators and not in others. This could be extended appropriately throughout the document. However, we would be concerned that this option would be highly repetitious. In preference, we suggest that a section should be included in the introductory section of the document, making it clear that the application of each Indicator should apply to particular organisations based on their risk factors which is assessed, in part, on their level and nature of engagement with children. We have assumed that CPSL will incorporate the level and nature of an organisation's engagement with children when the auditing process is undertaken with respect to the Standards but clarity on this aspect would assist.

As drafted, there will be a challenge for small religious institutes to meet these standards because of resources. This is relevant when there is no contact with children (or very little incidental contact). There needs to be an acknowledgement of the inherent risks in different organisations and a need for a response that is commensurate with the identified risks when applying the Standards to various

institutions.

D) Evaluation

The methods for evaluating outcomes are also unclear. Whilst an organisation needs to comply with the requirement to have policies and practices that promote child safe culture in place, it is well shown that unless they are implemented in a meaningful way, they add no value to protecting children. In fact, they can mask risks factors in an agency due to over reliance on written (as opposed to lived) policies and culture. We understand that the Royal Commission intended to have Child Safe Standard 10 with respect to policies and procedures as the last Standard. The case of YMCA re Johnathan Lord (Case Study 2) and the Diocese of Toowoomba (Case Study 6) speak for themselves. Further, the document does not specify a requirement that organisations regularly evaluate child safety to assess whether safeguarding steps taken actually assist to increase safety over time and accordingly whether the risk to children decreases. There is a difference between outputs and outcomes that needs to be measured as a true indication of the effectiveness of the Standards.

The application of the Standards (pgs. 2-4)

We recommend that the first paragraph refers to the application being to both leaders and membership, not just leaders as the culture of an organisation must be impacted at all levels. With respect to the second paragraph, clarity is sought on the extent of CPSL's work in religious ministries outside Australia, particularly in Asia and the Pacific Islands. Clarity in this area would assist church authorities in understanding the application of the Standards and audits in this regard.

7.2.1 We note that this particular Indicator recognises the differences between organisations and groups and is therefore more useful. Consideration should be given to utilise this language to indicate the varied application of the Indicators depending on the organisation's nature and extent of engagement with children either:

- a. in relation to each Standard; or
- b. as a section included in the introductory section regarding the application of the Standards

Images/Symbols

Standard 1 - the image appears to be a man's arm. As this standard relates to governance and leadership, we suggest that the image is changed to encourage greater female participation in governance and leadership in the Church. We suggest a gender-neutral image or an image which symbolises both male and female participation.

Standard 2 - in meeting with survivors, we have received feedback that having images of hands, especially as representing children, is problematic as often abuse occurs by people using their hands. We suggest a gender-neutral image or an image which symbolises participation of both boys and girls

Standard 4 – is a traditional judicial symbol, which is a system which has not always aided victims/survivors and in many cases has caused further damage. We suggest an image disassociated with the justice system. Suggest an equal sign.

Standard 10 - the image does not denote improvement but suggests that the Church is going around in circles. Possibly a forward arrow could be used.

Standards; Criteria; Indicators; and Implementation and Evidence Guide (pgs 5-27)

Purpose

The Implementation Guide focuses on dioceses, larger structures and religious institutes. There does not appear to be consideration in the Implementation Guide with respect to other Catholic organisations such as Association of Christ's Faithful and very little in relation to public juridic persons (PJPs).

There are many references to leaders/leadership teams/church entities/church authority. It would be helpful for this to be simplified and to ensure it has relevance for Catholic organisations. We also note that the language needs to be tightened through the document. For example, at 3.2 – 'the Church entity openly displays information that is visible'.

We suggest that the definitions of 'child abuse' need to be reconsidered and whether it should be more aligned with the definition used in the Royal Commission Final Report. Further comments in relation to the Glossary are provided at the end of this submission. We note that the Consultation Paper did not set out a section allowing comments with respect to the glossary.

Lastly, each of the dot points in the Implementation Guide should be allocated a letter (e.g. a, b and c etc) for ease of reference in the consultation process and later.

We are happy to assist in further discussion on any of these issues.

Standard 1: Committed leadership, governance and culture

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

Needs improvement

<p>1a. Please explain your response.</p>	<p>As referred to in the general comments, the governance bodies of many religious institutes and congregations are responsible for members and ministries in Oceania and Asia and who send members around the world to minister and undertake other tasks. CPSL would need to consider whether the requirement for compliance with the Standards and subsequent audits apply only to the activities which occur in Australia. If not, CPSL will need to give clear guidance on expectations.</p> <p>There are a number of points where the Implementation Guide is directive rather than considering what applies relevantly to the particular organisation. See general comments above with respect to the application of the Indicators and Implementation Guide.</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>

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

1.1 Whilst policies and practices are essential, we suggest that there be a greater emphasis on cultural change to foster child safe organisations. The current Indicator (1.2) should precede (1.1). Whilst an organisation may comply with the requirement to have policies and practices in place, the documents should prioritise the need for organisations to develop and maintain a child safe culture. We think the Royal Commission intended to have Child Safe Standard 10 with respect to policies and procedures as the last Standard. As referred to above in the general comments, many of the Royal Commission's case studies including the case of YMCA re Johnathan Lord (Case Study 2) and the Diocese of Toowoomba (Case Study 6) showed the inadequate response of institutions despite current and operational policies, due to cultural/leadership deficiencies.

There should be a reference to Police in the reporting examples in the evidence – failure to report to Police was a major issue highlighted by the Royal Commission and needs to be named in this document. It is necessary to create three clear distinctions between reportable conduct schemes, reporting to Police and reporting to child protection authorities – many Catholic Church authorities are confused by these different reporting requirements.

1.1.2 The evidence section should be broader as there is no reference to Catholic bodies in the '4th Estate', and little to PJPs

1.2.1 In in the third last dot point regarding the relevance of professional expertise in various areas, there is reference to complaint handling. However, this needs to be expanded to include reference also to investigations and handling complaints and concerns as it is important to

acknowledge at the outset dealing with issues/concerns/allegations even if they have not been characterised as a 'complaint'

1.2.2 The responsibility to advocate on behalf of children is another example of an Indicator which would not be applicable to all institutions. If the organisation and its membership has no engagement with children, there is little purpose, substance nor audience for the advocacy for children

1.2.5 There is a duplicate reference to contractors in the first dot point, delete sole contractors, as the reference to contractors encompasses all types of contractors

1.3.2 This is limited to unacceptable behaviour towards children by other church personnel. This should be amended by removing 'by other church personnel' and replacing with the words 'in the workplace/organisation'. This is because if a member of staff sees a person who attends, for example, mass, behaving in an unacceptable way towards children, this should be reported. In certain circumstances, by law, it would have to be reported

1.3.3 Discriminatory behaviour and language of any type should not be acceptable, not limited to the particular examples given

1.4 At the conclusion of the Implementation Guide ', removed or' should be inserted after 'identified' and replace the 'and' before mitigated

1.5 There should be a positive duty to share information with other organisations in which a person may pose a risk to children and vulnerable adults. [In some jurisdictions there will already be legislative provisions to enable such

	<p>information sharing to occur.] We recognise that this may have privacy implications and therefore should be included in the organisation’s policy so that the person knows before they commence work/involvement with the organisation that relevant information will be shared appropriately. There should be a reference to the decision-making process with respect to information sharing must be based on determining the level of risk to the safety, welfare or wellbeing of relevant children or adults identified</p> <p>1.6.1 The term ‘host party’ needs clarification. The term ‘for example’ needs to be inserted after ‘ministries including’</p> <p>1.6.2 This requires significant consideration because the governance of many religious institutes and congregations include Oceania and Asia. See above under general comments for further points on this issue.</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>Needs improvement</p>
<p>1a. Please explain your response.</p>	<p>N/A</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>Resources will be needed to meet the standards.</p>

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

2.1.1 This is framed as providing opportunities whereas our view is that the Royal Commission recommended that organisations actively seek a diversity of children’s opinions

2.1.2 Delete 'from abuse' from the Indicator. ‘Youth Safeguarding Officers’ are not explained nor is the term defined in the Glossary

2.2.1 The concern about this standard is its focus and tone. The purpose of the Royal Commission’s recommendations relating to children was for them to be fully engaged in the consultation and implementation process, amongst other things. The framing of this Indicator with the church entity ‘informing’ children of their ‘role and responsibilities’ seems to shift ‘responsibility’ for safeguarding onto children, which is inconsistent with the relevant Royal Commission recommendations. We suggest that words such as engage, invite, support, encourage, provide opportunity for children to take a lead in how they can contribute to a safe environment may be more appropriate for this Indicator, rather than informing children of their ‘role and responsibility’.

2.3.1 This is a further example of an Indicator which would not assist all organisations to keep children safe. It is unclear to us as to why organisations which have no dealings with children need to ‘establish links and develop good working relationship with statutory child protection services’.

2.3.2 The Indicator includes the words ‘appropriate to the context’. Please see our general comments with respect to the use of this term, specifically it is unclear why this appears in some Indicators and not in others.

<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>Needs improvement</p>
<p>1a. Please explain your response.</p>	<p>N/A</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>3.2.1 At the 3rd dot point, this refers to ‘ensures families, carers and the community know how, when and to whom complaints should be made’. The use of the single term ‘complaint’ is unnecessarily limiting, more so when we take into consideration a cultural reluctance to ‘dob’. Also, we seek to encourage a culture where issues need to be dealt with before they become ‘complaints’. Safeguarding focuses on responding to concerns - the environment needs to be created where parents, children, church personnel and others know where to go and who to contact when they have a concern as early as possible, whether or not it is characterised as a ‘complaint’; otherwise this may appear to imply or require unnecessarily that it be brought forward as a ‘complaint’</p> <p>3.2.2 The ‘title’ Safeguarding Trustee/Champion and Safeguarding Co-ordinators is unclear and will give rise to variations that may not be in accordance with the intention of this Indicator</p> <p>3.4.1 This needs to be appropriate to the ministry of the organisations</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?	N/A
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?	Needs improvement
1a. Please explain your response.	N/A
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?	<p>4.1.1 In some areas many diverse characteristics are referenced – in others, only some of them. To ensure consistency, there could be a general statement in the introductory section that applies to all of the Implementation Guide</p> <p>4.2.1 At the 1st dot point, ‘strives for’ is not relevant to an ‘Implementation and Evidence Guide’.</p> <p>4.3.1 The section requiring translation is another example of ‘needing to be as appropriate’</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?	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?	Needs improvement
1a. Please explain your response.	N/A
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	N/A

<p>address and alleviate these challenges?</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>5.1.2 There needs to be a broader assessment/descriptor than the ‘level of contact’, such as including the type of contact and nature of the service/activity etc</p> <p>5.1.4 The word ‘potential’ should be taken out and placed at the end of the sentence inserted as “and potential”</p> <p>5.1.5 This needs to include a focus on relevant skills, expertise and diversity</p> <p>5.2.1 It is unclear what ‘agreed and defined accepted or un-accepted alternatives to checks’ means</p> <p>5.3.1 This needs to be considered in terms of risk, the phrase 'all clergy and religious' should be placed after “credentials”. In considering risk, passing on all relevant information is essential</p> <p>5.4.1 We do not believe that CPSL should be mandating who attends training. Further, the Indicator is focused on the diocesan and religious institute contexts and should be expanded to include the other relevant Catholic entities. We suggest that the proposal that a Certificate of Attendance be provided to all attendees should not be included in this document</p> <p>5.5.1 The reference to tailored supervision strategies for church personnel working in isolated settings or remote areas is only one area of specific risk. The reference provides guidance that is direct and helpful in those circumstances, but narrow. CPSL may wish to consider providing the directive in relation to the principle of tailored supervision as a response to identified risk</p>

	<p>situations. CPSL could then follow this with examples if it wishes rather than just stating one example. This can help shape the thinking of an organisation towards risk generally rather than to one specific area</p> <p>5.5.2 It is unclear why 'all' is in bold. Clarification needs to be provided as to whether there is any requirement on a church entity to share information about people seeking to enter a seminary with other seminary or formation centres. This has been identified as an area of risk by the Royal Commission</p> <p>5.6.2 The term 'a range of areas' is unclear and vague. The Indicator could specify the relevant areas which a seminary/formation program needs to address</p> <p>5.7 The word "development" ought to be changed to "ongoing formation"</p> <p>5.7.1 The Indicator is awkward and unclear – "as far as practicable" should come before "follow"</p> <p>5.7.2 Clarification needs to be provided as to whether the Indicator proposes that it is only church personnel from overseas who are required to participate in a safeguarding induction program. It is noted that 5.7 addresses overseas Church personnel and accordingly it needs to be considered whether this comment is needed</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 6: Effective complaints management</p>	
<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic</p>	<p>Needs improvement</p>

entities?	
1a. Please explain your response.	N/A
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?	A challenge for organisations will be ensuring that they are always up-to-date with current law. It is unclear how this will occur and seems almost impossible for many
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	<p>We note that the lead line under the heading for standard #6 starts – “Processes for raising concerns and complaints …”. This reference to ‘concerns’ as well as to ‘complaints’ is a good thing. However, thereafter throughout all levels of #6, there are only 3 references to “concern” and even there they are only at the level of Implementation and Evidence Guide. Nowhere is reference to ‘concerns’ included amongst the Criteria or Indicators throughout all of Standard 6. [refer again to our commentary above at 1.2.1 and 3.2.1]</p> <p>6.4.1 We suggest that ‘where appropriate ensures’ is deleted and replaced with ‘offers’ – the rest of the sentence will need to be amended</p> <p>6.3.2 The Indicator is different from the Implementation Guide – the Indicator refers to action to be taken when there is a plausible complaint giving rise to risk which clearly can arise during the complaint handling and investigation stage; whereas the Implementation Guide refers to when there has been a complaint substantiated or a conviction. It is likely that further discussion is warranted on this issue.</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?	N/A
Standard 7: Ongoing education and training	
1. How would you rate this Standard in relation	Needs improvement

to safeguarding children from harm in Catholic entities?	
1a. Please explain your response.	N/A
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?	<p>7.1.2 The Indicator needs to be amended to insert 'working with children' after words 'church personnel' in line with the first point of the Implementation Guide</p> <p>7.2.1 We note that the Indicator recognises the differences between organisations and groups and is therefore more useful. Consideration should be given to utilise this language to indicate the varied application of the Indicators depending on the nature and extent of the organisation's engagement with children either:</p> <ul style="list-style-type: none"> a. in relation to each Standard; or b. included in the introductory section regarding the application of the Standards <p>7.3.2 We suggest the word "relevant" be deleted. An alternative term could be 'Church personnel who are engaged in child-related work'</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?	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?	Needs improvement
1a. Please explain your response.	N/A
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	N/A

address and alleviate these challenges?	
<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>8.1.2 'rite of confession' should be replaced with the words 'sacrament of reconciliation'. While noting that the sacrament of reconciliation is only undertaken by clerics, this Indicator should not be limited to dioceses and clerical religious orders as clerics can give (perhaps OFFER would be preferable) the sacrament of reconciliation in different contexts such as at schools</p> <p>It is noted that a narrow interpretation of this Indicator has been applied and raises the question whether other indicators should be narrowed</p> <p>8.2.1 Consideration must be given as to how small organisations would 'routinely monitor the online environment' and how useful this use of time and resources would be in keeping children safe if the organisation has no interactions with children. This Indicator is a good example of the difficulty mandating the Indicators for all Catholic entities and underlines our query about its effectiveness as currently drawn up in the Standards document</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>	N/A
<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>	Needs improvement
<p>1a. Please explain your response.</p>	N/A
<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>	N/A

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?	9.2.1 These Policies and procedures ought to be available, not only to church personnel but should be publicly available to ensure accountability and transparency and as a necessary part of engagement with the relevant community.
Standard 10: Regular improvement	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Needs improvement
1a. Please explain your response.	N/A
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?

GLOSSARY

The website feedback process provides no opportunity to comment on the Glossary. There are a number of concerns in relation to terms and definitions, some of which are set out below. It is also unclear where some of these defined terms are included in the Standards.

Child abuse We believe that these definitions should be reconsidered. We are happy to discuss this further with you. Physical abuse does not need to be aggressive. It should include threats and reckless behaviour, not linked to punishment. Sexual abuse does not refer to a person but rather is an act. This section needs to be reworked and consideration should be given as to whether the definition should be more aligned with the definition used in the Royal Commission Final Report. If exposure to family violence is generally considered to be a form of psychological abuse (as stated in these definitions), it is unclear why it currently has a separate heading. It should be noted that psychological abuse can be one off behaviour or a pattern of behaviour.

Child exploitation the phrase 'child abuse material' should be included

Church Authority by insertion of the dot point 'and their authorised delegates, responsible for the Church entity', 'Church Authority' has a different meaning from the usual meaning of 'Church Authority'. Consideration needs to be given as to whether lay organisations such as Couples for Christ fall within the definition of Church Authority and if so, who would be included as the Church Authority. This should be made clearer. If it does not apply to PJP's and other lay Catholic organisations, then

consideration needs to be given as to the requirement of these Catholic entities to comply with all the Indicators, which require the church authority to take action

Grooming is referred to in the document on several occasions but is only included in the Glossary with respect to child exploitation. Grooming should be included in the definition of child sexual abuse including crossing of boundaries and be clearly defined.

Leadership team the leadership team as defined in the glossary is narrow and echoes the current Church governance structures. The Royal Commission has called for a review of those structures. Therefore, we would suggest that the terms and limitations are changed

We are very happy to meet with you to discuss further.