Submitted Date	07-Jun-2018 15:03
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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	Catholic School Parents Australia
5. Please indicate the type of Catholic entity you are officially responding on behalf of	Parents/Carers with children in Catholic schools
6. Please indicate the approximate number of Church personnel affiliated with your organisation	1 - 100
8. Please select the state(s) and/or territory(s) you are based in?	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	Agree
1. The National Catholic Safeguarding Standards are: - User-friendly	Agree
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.	Strongly Agree
3. I/we believe that the National Catholic Safeguarding Standards will facilitate appropriate response to disclosures, allegations and suspicions of harm to children in Catholic entities.	Agree

4. I/we believe that the National Catholic Safeguarding Standards will reduce the likelihood of harm to children in Catholic 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**	About Catholic School Parents Australia Catholic School Parents Australia is recognised as the national body representing and advocating for the parents/carers of over 766,000 children and young people who attend the 1737 Catholic schools across Australia. CSPA works in collaboration and consultation with the National Catholic Education Commission and is recognised by the Australian Catholic Bishops Conference through the Bishops Commission for Catholic Education. CATHOLIC SCHOOL PARENTS AUSTRALIA Response to CPSL Survey Preamble to response As the national body representing and advocating for the parents/carers of over 766,000 children and young people who attend the 1737 Catholic schools across Australia, Catholic School Parents Australia (CSPA) appreciates the opportunity to give feedback on the draft of the National Catholic Safeguarding Standards. CSPA cannot emphasise enough the importance of having the voice of parents at the heart of the content and construct of these historical standards. Catholic School Parents Australia (CSPA) commends the work of CPSL in drafting the National Catholic Safeguarding Standards in response to the Royal Commission. The Royal Commission into Institutional Responses to Sexual Abuse Report and the Australian Human Rights Commission National Statement of Principles for Child Safe Organisations provide key references which, through the National

Catholic Safeguarding Standards, need to profoundly and compellingly inform the work practices of all personnel, especially those who work with children, young people (and vulnerable adults*) within the broader workings of the Catholic Church.

CSPA's representation and advocacy role is for the parents/carers of children and young people in Catholic schools across Australia. CSPA therefore suggests that "young people" be also used together with "children" in the initial discussion to the standards document as well as in the standard descriptors. For example, it seems more appropriate to refer to a year 11 student as a young person rather than a child.

While CSPA is supportive of the meticulous detail within each standard, every attempt has been made to be constructively critical towards making each standard more robust and explicitly and proactively 'leaving no stone unturned' in setting the uncompromising standard for work with children, young people (and vulnerable adults*).

For completeness, CSPA's response to the Royal Commission's Issues Paper No 9 is also attached. Various points within the attached copy of this paper have been highlighted.

Feedback will now be provided for each of the standards. While for some standards the feedback will be set out by responding to the questions, for other standards only a general comment is made.

[*CSPA is aware that describing more detail around the standards in relation to vulnerable adults is planned for completion at a future date].

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
1a. Please explain your response.	Please explain your response. Standard 1 attracted a lot of concerned comment from CSPA Council, especially around the title of the standard. If the abbreviated title for each standard is taken from the Wheel of Child Safety (Australian Human Rights Commission) rather than utilizing the fuller standard title, CSPA believes that key focus and impact of the standard can be diminished. For example, for Standard One, reference to "Committed leadership, governance and culture" does not provoke the action that "Child safety and well-being is (sic) embedded in organisational leadership, governance and culture" does - the latter provides far greater focus and expectation as to what is required. The latter is the title for Standard One in the report of the Royal Commission into Institutional Responses to Sexual Abuse Report and the Australian Human Rights Commission National Statement of Principles for Child Safe Organisations. While these are picked up in the Key action areas and Indicators that this principle is upheld, it is suggested that the title misses a key opportunity of reinforcing the key message. In both of these documents, the wording in Standard One also states that child safety and wellbeing be 'embedded' in governance and culture. And yet, the CPSL standard talks about 'promoting' an inclusive, welcoming environment for children, stopping short of the directive that child-safe practises should be embedded in the culture. There can be similar discussion for the other standards' titles as well.

	A key introductory comment that pertains to all the standards is that when the key church entity/person is from some other race/culture, and when that race/culture has significantly different societal norms, that during training there is a period of discernment during which assessments are undertaken around suitability of the person being compliant in relation to these standards. Withstanding sensitivities and being highly respectful and not discriminatory in any way especially around race, these aspects need to be closely monitored in relation to the standards.
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?	CSPA suggests that the expectation that Standard One will facilitate the embedding of practices pertaining to child safety and wellbeing, and that bodies will be accountable around developing and maintaining this culture that verbs such as "direct or authorise" should be used rather than "promote". A clear message to Catholic church entities should be that child safeguarding is an authorised priority and must be built into the culture, it is not sufficient enough for it to be merely promoted.
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	This standard will introduce an expectation which might not have existed earlier within some Catholic agencies. A clear challenge will be at 1.2.5 in relation to the provision of adequate training to various Catholic church personnel. Where there are widely differing cultures, including clearly differing cultures of expectation around, for example, women and children, there must be effective filters and mentors in place to ensure compliance.
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 descriptors in Standard One call for a hierarchy of safeguarding personnel to be appointed to uphold the new practices. There will be a need for very focussed professional

	development of such personnel coming out of the findings of the Royal Commission Report. It would seem wise that women proportionately will fill an appropriate number of these roles since the Report highlighted the absence of women in Church hierarchy as an issue.

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.	The discussion around Standard One's title pertains to Standard Two as well. Abbreviating the title dilutes the message and this should be avoided.

Children and parents are generally educated around matters of child protection once children become of school age. In saying this, schools need to ensure that there are multi-modal opportunities to educate parents around child protection safe-guards and protocols of reporting. Perhaps there should be formal, yet easy to read documentation that is given to every mother/father of a new born child such that they can be informed around expectation of child protection matters during a child's pre-school years. |
| **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?** | Any church entity that deals with children should be inducting church personnel into the identification and awareness of unsafe or bullying behaviour between children. It would be prudent to work with community experts and parents in raising the skill levels of Church personnel. Children knowing a range of trusted adults who they can report to in any church setting is vital around their protection. |
| **3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these** | This standard will introduce an expectation which might not have existed earlier within some Catholic agencies. A clear challenge will be at |

Standards?	2.2.3 in relation to the provision of adequate training to various Catholic church entities and personnel. Where there are widely differing cultures, including cultures of expectation around, for example, ways to discipline children, there must be effective filters and mentors in place to ensure compliance.
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?	It is vital that children receive adequate training such that they understand if and when abuse is occurring or has the potential to occur. For example, the discussion at #2.3 and #2.4 are key and being able to have all children informed around this is the glue that will facilitate this standard being relevant and effectively implemented.

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?	Somewhat effective
1a. Please explain your response.	The discussion around Standard One's title pertains to Standard Three as well. Abbreviating the title dilutes the message and this should be avoided. Once again the language used could be stronger and more definite. For example, rather than saying, "The Church entity promotes open dialogue …" at #3.2.1, it could read "The Church entity uses multimodal opportunities to ensure open dialogue ."
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?	Communication with parents is vital and passive attempts around informing parents, e.g. through placement of information on a website cannot be the only avenue by which families can access information. Wherever possible, having parent portals to electronically provide up to date information which is easily visible, easily accessible and written in parent friendly language, should be minimal requirements.

	In relation to the above, any relevant websites also need to be mobile phone friendly to maximise ease of access.
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	Ignorance of information and process will be the challenge for church entities, however ignorance should no longer be a defence of protocols being breached and/or abuse happening. The training of relevant people needs to be on-going with meticulous records kept and monitoring processes in place. Regular training updates need to be built into any protocols.
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?	Key elements seem to be covered however, the language used must leave no doubt around mandated expectations.

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 discussion around Standard One's title pertains to Standard Four as well. Abbreviating the title dilutes the message and this should be avoided. While Standard Four details seem to cover the key aspects, this standard is particularly sensitive around upholding the rights of the child according to national expectations and standards.
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?	This standard is particularly sensitive around respecting the rights of families from different cultures and at the same time upholding the rights of the child according to national expectations and standards. This can play out when the significant church entity is from a different culture, or the family of a child is of a different culture or the peer to peer interactions

	are enriched and complicated around differing cultures.
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	Reaching people of different cultures, especially if significant participants are of non-English speaking backgrounds, can be a challenge. For example, thought will need to go into how effective training can be undertaken where English is not an option for delivery. This presents a challenge which many schools have had to address and hence could be a useful reference as to effective practice. Providing student protection information in different languages, which are dominant for a particular context, must be a consideration.
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?	This is a clear instance where information and process sharing must be multi-modal in order to reach as many people as possible. Also, as discussed earlier, when the key church entity/person is from some other race/culture, and when that race/culture has significantly different societal norms, that during training there is a period of discernment during which assessments are undertaken around suitability of the person being compliant in relation to these standards. Withstanding sensitivities and being highly respectful and not discriminatory in any way especially around race, these aspects need to be closely monitored in relation to the standards. This same discussion applies where there are children of families with these characteristics.

Standard 5: Robust human resource management

1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	The discussion around Standard One's title pertains to Standard Five as well. Abbreviating

the title dilutes the message and this should be avoided. Having said this, this standard seems to set-out the key elements around this aspect of the professional standards agenda.

While a number of earlier comments pertain to this standard, it is noted that the language used once again could be stronger. For example, if "All Church personnel participate in a Safeguarding Induction program …" or "receive an appropriate …" could be changed to "All Church personnel undertake in a Safeguarding Induction program …" this would convey a different message. There should be no uncertainty around the priority level at which this training should be seen by the trainer and the Church personnel undertaking the training. "Participate" is used at #5.4.1, 5.4.2 and 5.7.2 whereas "undertake" is used at #5.5.2 and the difference in expectation is easily discerned. "Robust" management captures the expectation of authority around this standard, however this must be backed up in the fine print.

Perhaps at #5.4.1 "as soon as possible or at least within the first one month of commencing …" could be used rather than "within 4 months of commencing …" to convey the urgency of this training. To a degree it can be similar to conducting 'a first for the year' school fire drill and/or lock down practice on the last day of term one - portrays an assumption that has no logic and presents as very high risk.

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.	The discussion around Standard One's title pertains to Standard Six as well. Abbreviating the title dilutes the message and this should be

avoided.

The Criteria, Indicators and Implementation and Evidence Guide seem to cover most of the key elements of this standard. However, a key consideration is the degree to which people are made aware of the complaints management system in relation to it being "publicly available, accessible, age appropriate and child friendly" – it is vital that attention is paid to these elements around the complaints process being made known, otherwise complaints, which are often made by the complainant while under stress, may not be made.

It is suggested therefore, that a new 6.1 could be introduced (i.e. 6.1 The Church entity is proactive at ensuring that the complaints management system is known to the broader community.) The Implementation and Evidence Guide then needs to outline the ways in which the 'complaints management system' must be made known to the wider-community served by the Catholic entity. For example, the complaints process needs to be clearly visible, easily accessible via multiple pathways and written in appropriate language which is age appropriate, language appropriate (if possible, in various dominant languages for the context) and child friendly. Language cannot be a barrier to all who need to be informed being informed in relation to student protection information, processes and the right and means to make a complaint.

Standard 7: Ongoing education and training

1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Somewhat effective
1a. Please explain your response.	The discussion around Standard One's title pertains to Standard Seven as well. Abbreviating

the title dilutes the message and this should be avoided.

The key elements in relation to Standard Seven appear to be covered. As referred to in Standard Five (#5.4.1) however, having the expectation that introductory training will occur within the first 4 months seems to be introducing unnecessary risk. While it is understood that such training should take place as soon as possible, 4 months seems too long whereas one month would seem more appropriate. As such training would be available on-line this would seem a not too onerous expectation.

Also, this time range could be dependent upon the degree of contact personnel in question have with children. A matrix of roles could be set up with maximum periods within which training would need to be completed. For some roles, it would seem reasonable that the completion of the training would be a pre-requisite to someone commencing in that 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 on-going monitoring can be a real challenge in relation to that undertaken at the point of induction and subsequently on an on-going basis. Personnel have different starting times in roles and attention/time must be given to ensure that they are compliant around training prior to working with children. Schools, for example systemic Catholic schools have developed effective and efficient practices around this however they have the advantage of numbers with diocesan office personnel dedicated to this task.
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these	Please see above discussion for this standard.

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?	Please see above discussion for this standard.

Standard 8: Safe physical and online environments

1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Somewhat effective
1a. Please explain your response.	The discussion around Standard One's title pertains to Standard Eight as well. Abbreviating the title dilutes the message and this should be avoided.

Standard Eight is very thorough in outlining how physical environments might be made more safe around minimising opportunities for children to be harmed. A challenge for church entities is to have line-of-sight to an important other (e.g. supervisor/other person) for anyone working with children, especially for those working in confidential roles with vulnerable children.

A learning from school environments is that rooms which are often used for interview must have generously sized, uncovered, transparent windows at eye level, such that any interactions occurring inside these rooms, while perhaps 'private' by necessity, are always visible and 'public'. Such constraints, which should be enforced along with this standard, would render many church/parish rooms unusable for the purposes as described within this standard.

It is suggested therefore, that this standard could be made more explicit around such matters as those described above.

The on-going challenge of minimising the risk of |

child abuse in relation to cyber-safe practices could be informed through the effective and successful work in this area by many Catholic schools. A national clearing house of cyber safe policies and practices developed by schools at the cutting edge in this space could be shared nationally to inform policies and practices for church entities, including schools, and also families. In particular, knowing the signs of suspected on-line grooming would be a key area for knowledge sharing and regular updating.

Standard 9: Policies and procedures support child safety

1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	The discussion around Standard One's title pertains to Standard Nine as well. Abbreviating the title dilutes the message and this should be avoided. It seems that key elements around what would be expected in this standard seem to be included. Communicating the expectation of having policies and procedures in place and striking the right tone within the communication around expectation of this would seem essential starting points towards capacity building of many church agencies. Most church organisations are human resource poor and the generation of generic policies and procedures to assist having these documents in place will be an essential given. In turn, it is vital that these policies and procedures are adapted to suit the local context while not diminishing the crucial, mandated components of each. The initial policies and procedures will set the

	benchmark for decades to come so it is vital to get these right.

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.	The discussion around Standard One's title pertains to Standard Ten as well. Abbreviating the title dilutes the message and this should be avoided. Standard Ten seems to cover most key elements, a vital aspect of which is a process to access regular feedback from stakeholders. The on-going education and training of key personnel is a mandated given however to facilitate on-going improvement there needs to be feedback loops from all types impacted by the processes, not only the feedback as identified through complaints – staying ahead of the game and minimising the opportunity for complaints to emerge requires on-going reflection and refinement of procedures. Having some national central agency to act as a clearing house for all Catholic agencies around on-going improvement would seem a fundamental necessity.