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1. Is this an individual response or are you officially responding on behalf of an organisation?	Individual
2. Please provide your name	Mark Eustance
3. Please indicate your stakeholder group(s) :	Professional
8. Please select the state(s) and/or territory(s) you are based in?	Queensland
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	Disagree
1. The National Catholic Safeguarding Standards are: - Consistent and accurate in their use of terminology	Agree
2. I/we believe that the National Catholic Safeguarding Standards create conditions that will increase the likelihood of identifying and reporting harm to children in Catholic entities.	Agree
3. I/we believe that the National Catholic Safeguarding Standards will facilitate appropriate response to disclosures, allegations and suspicions of harm to children in Catholic entities.	Agree
4. I/we believe that the National Catholic Safeguarding Standards will reduce the likelihood of harm to children in Catholic entities.	Agree

<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>Comprehensive standards</p> <p>Is there a need to include 'spiritual' abuse within the definition of child abuse?</p> <p>Should child exploitation come within the definition of child abuse?</p> <p>Should 'viewing' child pornography/exploitation material be included in the definition of child exploitation?</p> <p>Should 'grooming' be specifically defined in the glossary?</p> <p>Should seminarians be specifically included in the definition of church personnel?</p>
<p>Standard 1: Committed leadership, governance and culture</p>	
<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</p>	<p>Effective</p>
<p>1a. Please explain your response.</p>	<p>The standard proposes measures that should sufficiently addresses relevant issues subject to the capacity and resources available to Church entities.</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>1.2.2 discusses the appointment of a 'Safeguarding Trustee/Champion'. The definition of 'Safeguarding Trustee/Champion' states that an appointee to this role should be 'an individual at the highest level of leadership in the Church entity'. This definition tends to indicate that an appointee to the role be a member of the clergy or religious person. If this is not the case, and the role could accommodate others (for example, external lay professionals) then perhaps the definition could be rephrased accordingly.</p> <p>1.6.1 should be rephrased to make it explicit that the measure only relates in circumstances where children are engaging in activities or ministries.</p>

	<p>1.3 discusses a code of conduct. Most lay employees are subject to a code of conduct as part of their employment. Clergy and Religious are subject to the Integrity in Ministry code of conduct issued in 2004 by the Australian Catholic Bishops Conference and Catholic Religious Australia. This document will need to be revised to accommodate more current standards and practices, particularly in respect to engagement with children and the online environment. Alternatively, Integrity in Ministry could be revoked and replaced with a new, more relevant code of conduct. In lieu of any form of code of conduct for clergy and religious reliance will be placed upon the canon law only.</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>1.2.3 discusses the appointment of Safeguarding Coordinators at the Diocesan or congregational and possibly at the local level (e.g. parish). Those appointment of Safeguarding Coordinators (or the like) at the local level are likely to be volunteers. If this is the case, the recruitment of suitable candidates will be challenging and appointments are likely to fluctuate. Additional support and resources (e.g. training, development, supervision) from the Diocese or congregation will be required to ensure they are fulfilling the role in a proper and consistent manner in accordance with standards. Responding appropriately to safeguarding issues and concerns, and potentially abuse disclosures or incidents, is likely to be fraught for some. It is recommended that should appointments at the local level be made the role should primarily focus on safeguarding advocacy.</p> <p>1.3 provides that all Church personnel will be required sign a code of conduct. This suggests that all existing and new personnel will be subject to this requirement. This is a significant endeavour particularly for those larger entities</p>

	with large numbers of employees, clergy, religious and volunteers.
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 2: Children are safe, informed and participate	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	The standard proposes measures that should sufficiently addresses relevant issues subject to the capacity and resources available to Church entities.
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?	2.1.2 discusses the appointment of older children as ‘Youth Safeguarding Officers’. Whilst it is acknowledged that this initiative may assist in engaging children/young people in discussion on safeguarding further consideration should be given to the scope of the roles particularly in respect to receiving abuse disclosures. It is strongly recommended that the scope of the role primarily focus on safeguarding advocacy.
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	2.3.2 discusses the delivery of protective behaviours programs for children and parents and suggests that such programs be outsourced to expert providers. The implementation of this measure will be significant, and perhaps impracticable for some Church entities.
4. Are there any gaps in the Standard, Criteria, Indicators or Implementation and Evidence	N/A

Guide that you can identify, or areas that have not been covered?	
Standard 3: Partnering with families, carers and communities	
1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?	Effective
1a. Please explain your response.	The standard proposes measures that should sufficiently addresses relevant issues subject to the capacity and resources available to Church entities.
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?	3.6.1 discusses the risk management of known child abuse offenders. Could this standard be rephrased to address a broader range offending behaviour (beyond child abuse) to that which poses a potential risk to the safety/well-being of children? In addition, the proper assessment of risks associated with known child abuse offenders is likely require specialist/professional advice and assistance. Could the standard be amended to advise Church entities seek specialist/professional?
3. What are the main challenges and obstacles you can foresee to the implementation of, and achievement of compliance with, these Standards?	3.6.1 discusses the risk management of known child abuse offenders. The proper assessment of risks associated with known child abuse offenders is likely require specialist/professional advice and assistance.
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?	Effective
1a. Please explain your response.	The standard proposes measures that should sufficiently addresses relevant issues subject to the capacity and resources available to Church entities.

<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>This standard requires Church entities to implement measures to assist in responding to the safeguarding needs of children with heightened vulnerabilities. The range of measures stipulated in the standards will be a significant and perhaps impracticable requirement for some Church entities.</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 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>Effective</p>
<p>1a. Please explain your response.</p>	<p>The standard proposes measures that should sufficiently address relevant issues subject to the capacity and resources available to Church entities.</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>5.4 requires all Church personnel receive an appropriate induction and are aware of their child safeguarding responsibilities, including reporting obligations. However, 5.4.2 requires all Church personnel to participate in a safeguarding induction program before work with children begins. The standard may be interpreted as requiring all personnel to undertake a dedicated safeguarding induction program yet not all personnel work with children. For clarity, perhaps the standard can be rephrased to better identify which personnel are required to participate in a safeguarding induction program? For example, should the standard read, 'All Church personnel who work with children participate in a safeguarding induction program before work with</p>

	<p>children begins’.</p> <p>5.7.2 requires all overseas Church personnel to participate in a safeguarding induction program, before work with children begins. For clarity, perhaps the standard can be rephrased to better identify which overseas personnel are required to participate in a safeguarding induction program? For example, should 5.7.2 read, ‘All overseas Church personnel who work with children participate in a safeguarding induction program before work with children begins’.</p> <p>For further clarity, perhaps ‘work with children’ can be defined in the glossary? Alternatively, guidance on what ‘work with children’ means can be drawn from relevant legislation (e.g. Working with Children (Risk Management & Screening) Act 2000 Qld).</p> <p>5.7.3 requires overseas Church personnel be matched with a designated mentor. The mentor role will be critical in properly supporting the appropriate acculturation of overseas personnel. Therefore, perhaps 5.7.3 can be amended to give more emphasis to the mentor role including comment on the selection of mentors, particularly their suitability to work with children, and desirable mentoring skill set? Perhaps comment could also be made on the involvement of professional lay people in mentoring?</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>5.5.2 discusses professional supervision for all people in religious or pastoral ministry, including clergy, religious and lay personnel. This will be a significant and perhaps impracticable requirement for many Church entities.</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>

Standard 6: Effective complaints management

<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</p>	<p>Effective</p>
<p>1a. Please explain your response.</p>	<p>The standard proposes measures that should sufficiently addresses relevant issues subject to the capacity and resources available to Church entities.</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>Standard 6 discusses various aspects of a complaints management system. As a quality measure, perhaps the standards could make reference to the Australian/New Zealand Standard - Guidelines for complaint management in Organizations (AS/NZS 10002:2014)?</p> <p>6.2.1 refers to a step-by-step guide on what action to take if there are allegations or suspicions of abuse of a child. Currently, the Church operates the Towards Healing protocol in circumstances where such complaints arise. However, Towards Healing may not satisfy current best practice in responding to or managing such complaints and this may undermine the intent of this recommendation.</p> <p>6.3.2 uses the term ‘plausible’ as the threshold for standing down a person in religious or pastoral ministry who is the subject of a complaint of child abuse. To drive consistency, perhaps the standards could provide a working definition of the term ‘plausible’?</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>6.3.2. may also be in conflict with thresholds in canon law and the Church’s Towards Healing protocol.</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>

Standard 7: Ongoing education and training

<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</p>	<p>Effective</p>
<p>1a. Please explain your response.</p>	<p>The standard proposes measures that should sufficiently addresses relevant issues subject to the capacity and resources available to Church entities.</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>7.1.1 requires all Church personnel to participate in a safeguarding induction program before work with children begins. Not all Church personnel work with children however the standard may be interpreted as requiring all personnel to undertake a dedicated safeguarding induction program. For clarity, perhaps the standard can be rephrased to better identify which personnel are required to participate in a safeguarding induction program? For example, should the standard read, 'All Church personnel who work with children participate in a safeguarding induction program before work with children begins'.</p> <p>7.1.2 provides that, at least annually, Church personnel undertake refresher training in relation to the Church entity's Child Safeguarding policies and practices. However, the implementation and evidence guide provides that refresher training is undertaken by all personnel working with children. The standard may be interpreted as requiring all personnel to undertake safeguarding refresher training at least annually yet not all Church personnel work with children. For clarity, perhaps the standard can be rephrased to better identify which personnel are required to undertake safeguarding refresher training? For example, should the standard read, 'At least annually, Church personnel who work with children undertake refresher training in relation to the Church entity's Child Safeguarding policies</p>

	<p>and practices.’</p> <p>7.3.2 provides that ‘relevant Church personnel’ be provided with ongoing professional development to ensure their skills are appropriate when dealing directly with children. It would seem that this standard is targeting personnel who work with children. For the sake of clarity, perhaps the standards can be rephrased to read ‘Church personnel who work with children are provided with ongoing professional development to ensure their skills are appropriate when dealing directly with children.’?</p> <p>For further clarity, perhaps ‘work with children’ can be defined in the glossary? Alternatively, guidance on what ‘work with children’ means can be drawn from relevant legislation (e.g. Working with Children (Risk Management & Screening) Act 2000 Qld).</p>
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?	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?	Effective
1a. Please explain your response.	The standard proposes measures that should sufficiently addresses relevant issues subject to the capacity and resources available to Church entities.

<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>8.1.2 requires the rite of confession for children to be conducted only in an open space within the clear line of sight of another adult and further that if another adult is not available, the rite of confession for the child should not be performed. The standard appears to place a positive onus upon clergy to determine if a person is under 18 years of age. This may be difficult particularly with adolescents/youth. For clarity, perhaps the standard could be rephrased to better guide clergy in these circumstances. For example, the standard could read, ‘The Church entity policy should specify that, if a member of the clergy suspects that the person seeking to confess is a person under 18 years and another adult is not available, the rite of confession for the child should not be performed.’</p> <p>8.2.1 provides that the Church entity’s Code of Conduct should include requirements in relation to Church personnel interacting with children via technology. To better accommodate a variety of ministries and services (e.g. youth groups/services), and to give greater emphasis to this issue, might it be more appropriate to address this issue in a specific policy which is articulated with the Code of Conduct?</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>8.1.2 may be in conflict with canon law.</p> <p>As technologies progress, monitoring interactions with children via technology will be a significant challenge.</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 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>Effective</p>

<p>1a. Please explain your response.</p>	<p>The standard proposes measures that should sufficiently addresses relevant issues subject to the capacity and resources available to Church entities.</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>9.4.1 and 9.5.1 discuss enacting and embedding policies and procedures in all Church activities and monitoring compliance. To encourage compliance with these standards, perhaps the use of administrative decrees by Church leaders could be suggested?</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>N/A</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 10: Regular improvement</p>	
<p>1. How would you rate this Standard in relation to safeguarding children from harm in Catholic entities?</p>	<p>Effective</p>
<p>1a. Please explain your response.</p>	<p>The standard proposes measures that should sufficiently addresses relevant issues subject to the capacity and resources available to Church entities.</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>N/A</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>