

National Catholic Safeguarding Standards

Presentation Sisters Wagga Wagga

Catholic Professional Standards Ltd acknowledges the lifelong trauma of abuse victims, survivors and their families, the failure of the Catholic Church to protect, believe and respond justly to children and vulnerable adults, and the consequent breaches of community trust.

Catholic Professional Standards Ltd is committed to fostering a culture of safety and care for children and vulnerable adults.

This report is available at www.cpsltd.org.au/safe-church/church-reports/

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1. Executive Summary

1.1 Context

Catholic Professional Standards Limited (CPSL) was established by the Australian Catholic Bishops Conference (ACBC) and Catholic Religious Australia (CRA) in response to the findings of the Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission), presented on 15 December 2017 to the Governor General of Australia.

As part of its constitutional mandate, CPSL has developed the National Catholic Safeguarding Standards (NCSS), to provide the framework for Catholic Church entities to build safe cultures and environments and to ensure that safeguarding practices are consistently applied across the Australian Catholic Church.

The first edition of the NCSS was formally published on 30 May 2019 and applies to all Catholic ministries, including Catholic dioceses; religious institutes; institutions providing education, health and aged care, social and community services, pastoral care and other services.

CPSL has also established a risk-based audit program to assess compliance with the NCSS. This audit report includes the results of the NCSS compliance assessment for the Presentation Sisters Wagga Wagga (PSWW).

1.2 Background

PSWW is one of six autonomous Presentation Sisters Congregations in Australia and has 38 Sisters living in Wagga Wagga and the Sydney region. Whilst initially the ministry of PSWW was school based, in more recent years as education structures changed, the Sisters have moved into other activities, in particular those working to answer “the cry of the poor and the cry of the earth”. These activities continue through direct involvement, partnerships and the provision of funding to various groups which champion these causes. PSWW also has governance of one formal ministry - the Mount Erin Heritage Centre in Wagga Wagga - which is located on the site of the convent and school founded by the Sisters in 1876 and which displays the history of the Presentation Sisters in the Riverina and beyond.

In addition to the Sisters based in Australia, there are 17 National Presentation Sisters in the Aitape region of Papua New Guinea. PSWW is the receiving congregation, with canonical responsibility for these Sisters.

The scope of this audit included the activities of the PSWW Sisters in Australia (excluding those in aged care) and Papua New Guinea (PNG), as well as the operations of the Mount Erin Heritage Centre.

As there are no formal ministries governed by PSWW that currently provide services directly to children, PSWW has been assessed as a “Category Two” church entity for application of the NCSS (Incidental Contact with Children). There are seven NCSS Standards, 33 NCSS Criteria and 84 NCSS Indicators that apply to Category Two church entities. For further details of the category system and the Indicators which are applicable, refer to the NCSS documentation available on the CPSL website – www.cpsltd.org.au/

Our assessment of PSWW’s compliance with the Category Two Indicators is detailed in Section 2 of this report.

The PSWW leadership team continually emphasises safeguarding as an important issue in all aspects of its operations, a commitment which spans its long history commencing with the arrival of the first Presentation Sisters from Ireland in 1874. It is this commitment to children and to child safety which has prompted PSWW to volunteer to be the first Catholic organisation audited by CPSL for compliance against the NCSS and to use the audit process as a learning tool to improve their safeguarding practices.

The PSWW leadership team has been open, transparent and fully engaged throughout this audit. Our recommendations for improvement, including PSWW’s management responses are included in Section 3 of this report.

This audit report will also be publicly available on the CPSL website.

1.3 Audit Approach

The requirements of the NCSS seek to build a culture of shared responsibility for safeguarding and to ensure that policies, practices and codes of behaviour work in unison to prevent, detect and appropriately respond to potential or actual incidents of child abuse.

In this context, the audit processes we have undertaken are intended to provide reasonable assurance that safeguarding controls have been appropriately designed and are operating effectively. Accordingly, this report provides a point-in-time assessment of the safeguarding practices implemented by PSWW and the extent of compliance with the requirements of the NCSS.

This audit focused on:

- reviewing existing safeguarding practices in place within PSWW, for alignment with the NCSS;
- identifying best practices for potential sharing with other Church entities;
- assessing any gaps in compliance or requirements for remediation, including training and support.

Our audit approach included the following components:

- interviews, observations and enquiry with PSWW leadership, Sisters and relevant personnel;
- documentation and policy review;
- assessment of the design of safeguarding controls implemented by PSWW; and
- testing of the operation of safeguarding controls implemented by PSWW.

As part of the audit, we inspected and assessed records, policies and practices at the PSWW office in Berala, NSW and we visited and assessed safeguarding controls at the Mount Erin Heritage Centre in Wagga Wagga. We also interviewed a sample of thirteen (23%) PSWW Sisters in Sydney, Wagga Wagga and PNG to assess how safeguarding practices are implemented within their various activities and ministries.

1.4 Overall Audit Findings

PSWW has appointed a Safeguarding team and Safeguarding Coordinator at the highest levels of leadership, to implement and monitor the requirements of the NCSS.

Although PSWW no longer ministers directly to children, we saw evidence of a strong understanding of engagement with children and families in relation to safeguarding issues and this was evident in the documentation retained from the Nano Nagle camps that were conducted by PSWW from 1991 to 2016.

It is the policy of PSWW that all Sisters with ministry in Australia (except for those in aged care) have a current Working with Children Check, as well as regular training and updates in safeguarding matters. PSWW is in the process of organising safeguarding training for the office and general staff as well as further, ongoing training for the Sisters located in PNG.

PSWW does not have any candidates in Formation and we have not assessed any Formation program activities or curriculum at this time. However, should PSWW decide to take candidates for Formation in the future, the curriculum will need to be updated to include the appropriate safeguarding requirements.

The PSWW Leadership team has developed a formal risk management plan for the Mount Erin Heritage Centre, which considers potential safeguarding risks arising from interactions with the public as well as visiting school groups. A Risk Register has also recently been created for the Sisters' ministries and activities conducted in Australia (many of which are in a volunteer capacity) to identify key areas of risk with respect to safeguarding and to ensure the appropriate safeguarding measures are in place.

Whilst a formal risk management plan is yet to be documented for the operations in PNG, these risks are well understood and are monitored on a regular basis by the PSWW Leadership team.

PSWW has a clear and structured approach to complaints handling - there are no active complaints in progress and of the eleven complaints in the Congregation's history, there have been no complaints of child sexual abuse against any Sisters. Records are well organised and have been maintained in perpetuity.

At the time of the audit, which was conducted in April 2019, our preliminary assessment of PSWW's compliance with the NCSS Indicators indicated that PSWW had fully implemented or was substantially progressed in the implementation of 50 (80%) of the 63¹ Indicators which are relevant to their operations.

Subsequent to the completion of audit fieldwork and prior to the publishing of this report, PSWW has made further refinements and improvements to their practices. The final compliance assessment is shown below and indicates that PSWW has fully implemented or is well progressed in the implementation of 62 (98%) of the 63 Indicators which are relevant to their operations.

Implementation for the one remaining Indicator, which relates to monitoring of internet usage, is yet to be addressed and is under consideration by the PSWW Leadership team.

NB: Compliance has been assessed using a four-point maturity scale.²

National Catholic Safeguarding Standard	# NCSS Indicators (Category Two)	Not Relevant to PSWW (NR)	Assessment of Compliance			
			Managed & measurable (M)	Defined & developed (D)	Initial / Ad hoc (I)	Not addressed (N)
<i>1: Committed Leadership, Governance & Culture</i>	14	-	10	4	-	-
<i>5: Robust Human Resource Management</i>	21	9	7	5	-	-
<i>6: Effective Complaints Management</i>	24	6	17	1	-	-
<i>7: Ongoing Training & Education</i>	7	-	-	7	-	-
<i>8: Safe Physical and Online Environments</i>	6	2	-	3	-	1
<i>9: Continuous Improvement</i>	6	4	1	1	-	-
<i>10: Policies and Procedures Support Child Safety</i>	6	-	5	1	-	-
TOTAL	84	21	40	22	-	1
			62 (98%)		1 (2%)	

The compliance assessment for each applicable Indicator is detailed individually in Section 2 of this report.

Recommendations are classified according to priority and urgency for remediation.³ There are no Priority 1 (high rated) audit recommendations for PSWW. There are six Priority 2 (medium rated) recommendations and six Priority 3 (low rated) recommendations, which are detailed in Section 3 of this report. Each recommendation also contains PSWW's response to the audit finding, including management actions.

We would like to thank the staff and members of the PSWW congregation for their cooperation and assistance with this audit.

¹ Of the 84 NCSS Indicators applicable to Category 2, 21 of these are not relevant to current PSWW operations.

² Refer Appendix A for definitions of the ratings used for the Compliance Assessment.

³ Refer Appendix B for definitions of the Priority rankings used for Recommendations.

2. Assessment of Compliance with NCSS Indicators

Standard 1		Committed leadership, governance and culture			
<i>The leadership & governance arrangements of Church entities promote an inclusive, welcoming environment for children & provide the foundation for transparent, accountable & risk-based approaches to ensure child safety</i>					
Criterion 1.1 - The entity publicly commits to child safeguarding and takes a zero-tolerance approach to child abuse		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.1.1	The entity has a Child Safeguarding Policy that is approved and endorsed by the Church Authority and/or relevant leadership body and is publicly available		✓		
1.1.2	The entity publishes a Child Safeguarding Commitment Statement which is openly displayed and publicly available	✓			
Observations:					
1.1.1 The Policy for Safeguarding Children and Adults has recently been updated and is comprehensive but is not publicly available. Refer recommendation #1 .					
Criterion 1.2 - A child safeguarding culture is championed and modelled at all levels of the entity from the top down and bottom up		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.2.1	The Church Authority and leaders of the entity create and maintain an entity's culture of safeguarding by: <ul style="list-style-type: none"> Promoting child safeguarding regularly Emphasising that child-safeguarding is everyone's responsibility Actively monitoring safeguarding compliance and risk management 	✓			
1.2.4	Personnel understand that child safeguarding is everyone's responsibility and are empowered to provide input on child safeguarding practices	✓			
Observations:					
Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 1.3 - Governance arrangements facilitate implementation of a Child Safeguarding Policy across the entity's activities		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.3.1	Governance arrangements are transparent and include safeguarding roles and responsibilities to ensure accountability for safeguarding is clear	✓			
1.3.2	Where the Church Authority's governance includes countries other than Australia, the entity must apply these standards taking into account relevant international declarations and local legislation		✓		
Observations:					
1.3.2 PSWW is in the process of implementing the NCSS within its operations in PNG. Refer recommendation #2 .					

Criterion 1.4 - A Code of Conduct provides guidelines for personnel on expected behavioural standards and responsibilities		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.4.1	The Code of Conduct explicitly and equally applies to all personnel and provides guidance on appropriate and expected standards of behaviour of personnel towards children	✓			
1.4.2	The Code of Conduct is written in accessible language and communicated to personnel, children, families and carers		✓		
1.4.3	The Code of Conduct takes into account the needs of all children, paying particular attention to Aboriginal and Torres Strait Islander children, children with disability, and children from culturally and linguistically diverse backgrounds	✓			
Observations:					
1.4.1	Whilst all PSWW Sisters have signed the Code of Conduct, this requirement is still being implemented for PSWW staff. Refer recommendation #3 .				
1.4.2	The Code of Conduct is currently an internal document and is not publicly available. Refer recommendation #3 .				

Criterion 1.5 - The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.5.1	The entity has a clearly documented child safeguarding risk management plan, as part of its overall risk management strategy, which considers actual and potential risks relating to children	✓			
1.5.2	The entity has appropriate risk management processes in place to assess, evaluate, review and oversee the safeguarding of children participating in, or receiving ministries offshore, including cultural immersions, pilgrimages, solidarity campaigns and world youth days		✓		
1.5.3	Leaders of the entity manage safeguarding risks effectively, through regular identification, monitoring, reporting and review of risks	✓			
Observations:					
PSWW has a risk management plan for the Mount Erin Heritage Centre and has recently developed a Risk Register for other ministries in Australia. The Risk Register for PNG is currently in development. Refer recommendation #4 .					

Criterion 1.6 - Personnel understand their obligations on information sharing and record keeping		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.6.1	The entity has clearly documented information sharing and record keeping policies and procedures which are communicated to personnel	✓			
1.6.2	The entity's information sharing and record keeping policies and procedures relating to all aspects of child safeguarding, including incidents and complaints, apply sound record keeping principles	✓			
Observations:					
Minor wording improvements to record keeping policies and procedures suggested during the audit which have now been actioned. No further recommendations.					

Standard 5		Robust human resource management			
<i>People working with children are suitable and supported to reflect child safeguarding values in practice</i>					
Criterion 5.1 - Recruitment, including advertising, interview questions, referee checks and personnel pre-employment screening, emphasises child safeguarding		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.1.1	The entity emphasises its commitment to child safeguarding and zero-tolerance approach to child abuse in all aspects of its advertising, screening and recruitment for personnel		✓		
5.1.2	The entity documents its safeguarding approach in recruitment and screening procedures and processes		✓		
5.1.3	Positions are assessed for the expected level of contact with children and appropriate child safeguarding recruitment procedures are implemented		✓		
5.1.4	Position descriptions, selection criteria, referee checks and interview questions articulate: <ul style="list-style-type: none"> that children are valued and respected the commitment of the entity to child safeguarding where appropriate to the role, an understanding of children's developmental needs and culturally safe practices 		✓		
Observations: PSWW has now developed and incorporated safeguarding requirements into its recruitment policies and procedures for future recruitment. Refer recommendation #5 .					

Criterion 5.2 - Relevant personnel have current working with children checks or equivalent background checks		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.2.1	The entity has a policy which ensures that personnel have a current working with children check as required by legislation and/or have undergone other background checks prior to working with children	✓			
5.2.2	The entity keeps records and monitors the status of working with children checks and/or background checks for all personnel	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					

Criterion 5.3 - Personnel receive an appropriate induction and are aware of their child safeguarding responsibilities, including reporting obligations		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.3.1	All personnel participate in a safeguarding induction program, which occurs as soon as possible after commencement		✓		
5.3.2	All Church Authorities (along with members of their leadership team) who are a signatory to a Service Agreement with CPSL are required to participate in the National Catholic Safeguarding Standards Introductory Session for Leaders within four months of commencement	✓			
Observations: 5.3.1 PSWW is in the process of providing induction training for staff and volunteers. Refer recommendation #6 .					

Criterion 5.5 - Robust processes exist for screening candidates before and during seminary or religious formation, as well as for ongoing formation, support and supervision of clergy and religious		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.5.1	The Church Authority draws upon broad-ranging professional advice in its decision-making relating to candidates for seminary/formation programs and ordination/profession of vows. This includes a positive duty to disclose to other Church Authorities where an applicant or candidate does not continue through to ordination/profession of vows	Not relevant to current operations			
5.5.2	Seminary and initial formation programs have robust screening processes for candidates for religious ministry, including external psychological and psychosexual assessments	Not relevant to current operations			
5.5.3	The entity promotes as normative the participation of all bishops, leaders of religious institutes, clergy and religious in active ministry, in no less than 6 hours professional/pastoral supervision per year	✓			
5.5.4	The entity promotes as normative, all clergy and religious in active ministry, for the sake of proper accountability, are offered and access both ongoing professional development and annual performance appraisals	✓			
5.5.5	All newly ordained clergy and newly professed religious are supported with a suitable mentor for at least five years post ordination or profession	✓			
Observations:					
PSWW has a commitment to professional/pastoral supervision and the majority of Sisters we interviewed were undertaking this on a regular basis. Refer recommendation #7 .					

Criterion 5.6 - Seminary and formation programs for clergy and religious have appropriate curriculum to build the knowledge and skills of candidates to understand and lead child safeguarding initiatives		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.6.1	Seminary and initial formation programs have appropriate curriculum throughout the formation program which builds candidates' knowledge and skills in a range of areas to support child safeguarding	Not relevant to current operations			
5.6.2	Seminary and initial formation programs ensure promotion of pastoral responses to victims/survivors of sexual abuse	Not relevant to current operations			
5.6.3	Seminary and initial formation programs are delivered in such a way as to protect against the development and/or reinforcement of clericalist attitudes and behaviours	Not relevant to current operations			
Observations:					
N/A – PSWW does not have any candidates in Formation at this time.					

Criterion 5.7 - Credentialing and movement of seminarians, clergy and religious is appropriately managed		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.7.1	The entity implements a system to assess the credentials and manage movement of all seminarians, clergy and religious moving between different seminaries, formation programs and Church jurisdictions	✓			
Observations:					
Requirements of the Indicators are in place. No recommendations for improvement noted.					

Criterion 5.8 - Entities which receive overseas clergy and religious for work in ministry have targeted programs for the screening, induction, professional supervision and development of these individuals.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.8.1	Selection and screening procedures for overseas clergy and religious are targeted, thorough and follow, as far as practicable, the same processes as for Australian personnel. This includes the Australian Church Authority obtaining screening information from the international Church Authority				Not relevant to current operations
5.8.2	All overseas clergy and religious participate in a safeguarding induction program, documented by the entity, before work with children begins				Not relevant to current operations
5.8.3	Overseas clergy and religious are supported with a suitable mentor for at least the first two years of their time in Australia				Not relevant to current operations
5.8.4	The entity promotes as normative the participation of all overseas clergy and religious in active ministry in no less than 6 hours of professional/pastoral supervision per year				Not relevant to current operations
Observations:					
N/A – there are no overseas Sisters working within PSWW in Australian ministries at this time.					

Standard 6		Effective complaints management			
<i>Processes for raising concerns and complaints are responsive, understood, accessible and used by children, families, carers, communities and personnel</i>					
Criterion 6.1 - The entity has an effective Complaints Handling Policy and procedures which clearly outline the roles and responsibilities, approaches to dealing with different types of complaints, reporting obligations and record keeping requirements		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.1.1	The entity's policies, procedures and practices ensure that all mandatory reporting obligations are met	✓			
6.1.2	There are documented procedures that provide step-by-step guidance on what action to take for different types of complaints, including breaches of Codes of Conduct, disclosures, allegations or concerns of abuse of a child, be they historic or current	✓			
6.1.3	There are documented procedures for identifying and mitigating actual and perceived conflicts of interest in complaint management	✓			
6.1.4	The entity works in cooperation with relevant organisations and seeks specialist advice from statutory child protection services when necessary	✓			
6.1.5	Key roles and responsibilities in relation to handling complaints are articulated within the Complaint Handling Policy and procedures	✓			
6.1.6	The Complaint Handling Policy and procedures differentiate, where appropriate, between a child victim and an adult bringing forward a complaint of abuse suffered as a child	✓			
6.1.7	A process is in place to record all child abuse complaints, incidents, allegations, disclosures, concerns and referrals. The system must be secure so that confidential information is stored, protected and retained for 50 years	✓			
Observations:					
There are no active complaints. Procedures for complaint handling are clear and records are well maintained, however PSWW does not have a formal complaints register. Refer recommendation #8 .					

Criterion 6.2 - The entity has a child-focused complaints handling system that is understood by children, families, carers and personnel		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.2.1	The complaints handling system prioritises the safety and well-being of children	✓			
6.2.2	Complaints Handling Policy and procedures are publicly available in a variety of formats, including age and developmentally appropriate for children, enabling complaints processes to be easily understood		✓		
Observations: Complaints handling procedures are in place but are not publicly available. Refer recommendation #8 .					

Criterion 6.3 - Complaints are taken seriously, and responded to promptly and thoroughly		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.3.1	The Complaints Handling Policy requires that, upon receiving a complaint of child abuse, an initial risk assessment is conducted to identify and minimise any risk to children. Ongoing risk assessments are required throughout all investigation processes	✓			
6.3.2	The Complaints Handling Policy requires that at the completion of the initial risk assessment, where a complaint of child sexual abuse is plausible, and there is a risk that the person may come into contact with children, the person be stood down from their role and/or ministry while the complaint is investigated	✓			
6.3.3	The Complaints Handling Policy is aligned, and operates in conjunction, with the entity's documented disciplinary and grievance policies and processes, in such a way that at the completion of the initial risk assessment, a breach or breaches of the Code of Conduct in relation to inappropriate behaviour towards a child are effectively investigated and managed, and include provisions for personnel to be redeployed, stood down and/or dismissed	✓			
6.3.4	Complainants are responded to promptly and kept informed as to the progress of dealing with their complaint	✓			
6.3.5	Support and care are provided to a child who has experienced or is alleging abuse, and other affected parties	✓			
6.3.6	Appropriate confidentiality is maintained with due regard for the Australian Privacy Principles and relevant legislation in relation to information sharing in the context of child safeguarding	✓			
6.3.7	Documented policies and processes empower and support personnel to raise, in good faith, concerns and allegations about unacceptable behaviour towards children by other personnel	✓			
6.3.8	Where a complaint related to child sexual abuse against a seminarian, clergy or religious is substantiated on the balance of probabilities, with due respect to the rights of individuals, the Church Authority should remove that individual from ministry	Not relevant to current operations			
6.3.9	Where a seminarian, clergy or religious is convicted of an offence relating to child sexual abuse, that individual should be permanently removed from ministry. The Church Authority must take practicable steps to prohibit that individual from holding themselves out as being a person with religious authority and should present a case to the relevant dicastery for dismissal from the clerical state and/or dispensation from vows	Not relevant to current operations			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					

Criterion 6.4 - The entity has policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and cooperates with law enforcement		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.4.1	The Complaints Handling Policy requires that: <ul style="list-style-type: none"> concerns and complaints of child abuse occurring within the entity be reported to the appropriate statutory authority/ies, regardless of whether the reporting is mandated; and personnel cooperate with law enforcement procedures and directives 	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					

Criterion 6.5 - Reporting, privacy and employment law obligations are met		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.5.1	The Complaints Handling Policy requires that all relevant reporting, privacy and employment law obligations are met	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					

Criterion 6.6 - The Church Authority ensures mechanisms are in place to care for adult complainants		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.6.1	The entity offers appropriate pastoral care to adult complainants, which recognises their unique needs. This should include an offer from the Church Authority to meet the complainant in person	Not relevant to current operations			
6.6.2	The Church Authority facilitates adult complainants' access to appropriately trained personnel whose clearly defined roles are to listen to and represent the pastoral needs of the complainant. This is done in consultation with the complainant	Not relevant to current operations			
Observations: N/A – there are no active complaints. It is noted that evidence was cited of pastoral care for complainants involved in past matters raised with the PSWW.					

Criterion 6.7 - The Church Authority ensures mechanisms are in place to monitor and support respondents facing allegations		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.7.1	The Church Authority has access to appropriately trained personnel - lay, religious or clergy - whose clearly defined roles are to listen to and represent the pastoral needs of the respondent. This is done in consultation with the respondent	Not relevant to current operations			
6.7.2	The Church Authority has suitable arrangements in place for the monitoring and support of a respondent, where there is a plausible complaint, until (and if) the Church Authority no longer has responsibility for monitoring the respondent	Not relevant to current operations			
Observations: N/A – there are no active complaints.					

Standard 7		Ongoing education and training			
<i>Personnel are equipped with knowledge, skills and awareness to keep children safe through information, ongoing education and training</i>					
Criterion 7.1 - Personnel are trained and supported to effectively implement the entity's Child Safeguarding Policy		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
7.1.1	The entity provides regular opportunities to educate/train personnel on its Child Safeguarding Policy and procedures including through: <ul style="list-style-type: none"> • induction; and • refresher safeguarding training (at least every three years) 		✓		
7.1.2	The entity's induction and refresher safeguarding training must as a minimum cover: <ul style="list-style-type: none"> • Code of Conduct • safeguarding risk management • Child safeguarding Policy and procedures • Complaints Handling Policy and procedures • reporting obligations • e-safety training 		✓		
7.1.3	The entity keeps records of participation to ensure all personnel attend induction and refresher safeguarding training		✓		
7.1.4	The entity ensures that personnel who have specific child safeguarding responsibilities, such as those appointed to the role of safeguarding coordinator and those appointed to the safeguarding committee, receive ongoing support and professional development relevant to their role		✓		
Observations:					
PSWW has provided regular safeguarding training to the Sisters, however is yet to provide safeguarding training for staff and volunteers. Refer recommendation #9 .					

Criterion 7.3 - Personnel receive training to enable them to respond effectively to child safeguarding risks, concerns, disclosures and allegations of child abuse		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
7.3.1	The entity provides training to equip relevant personnel to appropriately respond to and support those bringing forward concerns, disclosures and allegations of child abuse		✓		
7.3.2	The entity provides training to ensure personnel are aware of information sharing and record keeping policies and procedures		✓		
7.3.3	The entity provides training to ensure personnel are aware of their reporting obligations under State/Territory legislative requirements including: <ul style="list-style-type: none"> • reporting criminal behaviour to police • mandatory reporting • reportable conduct scheme • reporting to regulatory authorities/government departments 		✓		
Observations:					
PSWW has provided regular safeguarding training to the Sisters, however is yet to provide safeguarding training for staff and volunteers. Refer recommendation #9 .					

Standard 8		Safe physical and online environments			
<i>Physical and online environments promote safety and contain appropriate safeguards to minimise the opportunity for children to be harmed</i>					
Criterion 8.2 - The online environment is used in accordance with the entity's Code of Conduct, safeguarding policies and procedures		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
8.2.1	Personnel access and use online environments in line with the entity's Code of Conduct and relevant communication protocols		✓		
8.2.2	The entity routinely monitors the online environment, reporting and responding to breaches of its Code of Conduct or child safeguarding policies in accordance with the entity's disciplinary, complaint handling or other relevant processes				✓
Observations: PSWW is yet to establish policies and procedures regarding use and monitoring of technology and the online environment. Refer recommendation #10 .					

Criterion 8.3 - Risk management plans consider risks posed by the entity's settings, activities and physical environments		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
8.3.1	The entity assesses and mitigates safeguarding risks in the physical environments under its control and/or management, including buildings, structures, open spaces, grounds, homes of religious and clergy, and arrangements for live-in carers/caretakers		✓		
8.3.2	Where an entity becomes aware that a person (other than personnel of that entity) attending any of its services or activities (including sacramental and liturgical celebrations) is the subject of a substantiated complaint of child sexual abuse or has been convicted of an offence relating to child sexual abuse, the entity has in place and implements a process for assessing and managing the risks posed to children by that person's ongoing involvement in the service or activity	Not relevant to current operations			
Observations: 8.3.1 PSWW has a risk management plan for the Mount Erin Heritage Centre and has recently developed a Risk Register for other ministries in Australia. The Risk Register for PNG is currently in development. Refer recommendation #4 .					

Criterion 8.4 - Entities that contract facilities and services to and from third parties have procurement policies that ensure safeguarding of children		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
8.4.1	The entity considers the risks posed to children arising from any third parties engaged by the entity and conducts sufficient due diligence to ensure that the contractor has appropriate child safeguarding practices and policies in place		✓		
8.4.2	The entity has conducted sufficient due diligence on all third parties who use the entity's facilities to ensure child safeguarding practices and policies are in place.	Not relevant to current operations			
Observations: 8.4.1 PSWW provides funding for various programs which minister to children. Formal funding agreements are already in place, however future renegotiations of these agreements should have appropriate clauses to specify PSWW's expectations regarding appropriate safeguarding practices for the funded activities. Refer recommendation #11 .					

Standard 9		Continuous improvement			
<i>Entities regularly review and improve implementation of their systems for keeping children safe</i>					
Criterion 9.1 - The entity regularly reviews and improves child safeguarding practices		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
9.1.1	The entity has a clearly documented Safeguarding Implementation Plan which outlines the monitoring and continual improvement of child safeguarding practices The Child Safeguarding Implementation Plan is regularly reviewed, progress is tracked and actions/strategies updated		✓		
9.1.4	The entity's Child Safeguarding Policy is subject to regular review – at least every 3 years	✓			
Observations:					
9.3.1 PSWW will be developing a Safeguarding Implementation Plan based on the outcomes of this audit. Refer recommendation #12 .					

Criterion 9.2 - The entity analyses concerns and complaints to identify causes and systemic failures to inform continuous improvement		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
9.2.1	Processes are in place to analyse individual incidents or complaints relating to child safeguarding practices and/or failures	Not relevant to current operations			
9.2.2	Processes are in place to identify and analyse systemic issues and/or patterns relating to child safeguarding practices and/or failures and drive continuous improvement	Not relevant to current operations			
Observations:					
N/A – there are no active complaints.					

Criterion 9.3 - The Church Authority reports on the findings of relevant reviews to personnel, children, families, carers and community		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
9.3.1	The Church Authority promotes to all its stakeholders any Audit Reports relating to the Church Authority, and related entities, published by Catholic Professional Standards Ltd.	Not relevant			
9.3.2	The Church Authority reports on findings of relevant reviews of safeguarding policies, procedures and practices to its stakeholders	Not relevant			
Observations:					
N/A – there are no such reports or reviews to date.					

Standard 10		Policies and procedures support child safety			
<i>Policies and procedures document how the entity is safe for children</i>					
Criterion 10.1 - Policies and procedures address National Catholic Safeguarding Standards		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.1.1	All relevant policies and procedures reference appropriate safeguarding approaches, requirements and responsibilities	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 10.2 - Policies and procedures are accessible and easy to understand		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.2.1	The entity's policies & procedures relevant to safeguarding are readily available and accessible to all personnel		✓		
Observations: The Policy for Safeguarding Children and Adults has been updated but is not yet publicly available. Refer recommendation #1 .					
Criterion 10.3 - Best practice policy models and stakeholder consultation inform the development and review of policies and procedures		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.3.1	The entity has processes in place to monitor adherence to policies and procedures relevant to safeguarding	✓			
10.3.2	The entity has a process in place to develop and review its policies and procedures relevant to safeguarding These processes includes consulting with and incorporating advice from experts, children, families, carers and communities	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 10.4 - The Church Authority and leaders champion and model compliance with policies and procedures		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.4.1	The Church Authority and leaders promote and enact all policies and procedures relevant to safeguarding	✓			
Observations: Requirements of the Indicator are in place. No recommendations noted.					
Criterion 10.5 - Personnel understand and implement the policies and procedures		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.5.1	The entity encourages regular discussion and feedback from personnel on their understanding and practical implementation of the policies and procedures	✓			
Observations: Requirements of the Indicator are in place. No recommendations for improvement noted.					

3. Detailed Findings



Standard 1: Committed Leadership, governance and culture

Child safeguarding is embedded in the entity’s leadership, governance and culture

Recommendation #1		Priority 2
Criterion 1.1 - The entity publicly commits to child safeguarding and takes a zero-tolerance approach to child abuse		
Details of finding	<p>PSWW has a recently updated Policy for Safeguarding Children and Vulnerable Adults (Safeguarding Policy) which is comprehensive and well written. During the audit, the following points were noted:</p> <ul style="list-style-type: none"> • The Safeguarding Policy does not specify a “zero tolerance” approach to child abuse (although this is implied within the document). • Page six of the Safeguarding Policy refers to the use of photos, social media and transport, however specific procedures for these areas have not been developed. • Page eight of the Safeguarding Policy refers to a Risk Management Policy which is yet to be developed. • Whilst the Safeguarding Policy has been recently updated, there is no review schedule in place. • The Safeguarding Policy has been rolled out to all Sisters (a tailored version has been developed for the operations in PNG) but the Policy is not publicly available. 	
Recommendation	<ol style="list-style-type: none"> 1. The Policy should be updated to clearly indicate a “zero tolerance” approach to child abuse. 2. Procedures should be developed for the use of photos, social media and transport or otherwise this clause should be removed/amended. 3. A Risk Management Plan, rather than policy, should be developed to cover all operations of PSWW (refer recommendation #4). 4. A review schedule be developed for all PSWW policies. This could be a simple template indicating the name of the policy, date it was last updated, a date for review and a responsible officer. 5. The Safeguarding Policy should be published and easily accessible on the PSWW website, together with the Safeguarding Commitment Statement and Code of Conduct (refer recommendation #3). 	
Agreed PSWW Actions	<ol style="list-style-type: none"> 1. Completed - policy amended to include a “zero tolerance” approach to child abuse. 2. Completed - paragraph has been removed and relevant wording updated. 3. Risk Management Plan has been developed for all Australian ministries – Risk Management Plan for PNG in progress. 4. Completed - review schedule now in place. 5. In progress - the Safeguarding Policy together with the Safeguarding Commitment Statement and Code of Conduct will be published on the PSWW website, subsequent to discussion and ratification at the Plenary Leaders’ Council. 	
Responsibility	Sr Margaret Barclay, Safeguarding Officer	
Due date	<p>Items 1, 2 and 4 - completed - no further action required</p> <p>Item 3 - 31 August 2019</p> <p>Item 5 - 31 August 2019</p>	

Recommendation #2		Priority 2
Criterion 1.3 - Governance arrangements facilitate implementation of a Child Safeguarding Policy across the entity's activities		
Details of finding	<p>PSWW has 17 PNG National Presentation Sisters in the Aitape region of Papua New Guinea (PNG). PSWW is the receiving congregation, with canonical responsibility for these Sisters. Currently, all PNG Sisters are operating within ministries under the governance of a Diocese of PNG or other organisation.</p> <p>PSWW has undertaken significant work with the Sisters in PNG in the areas of training, safeguarding awareness and expected codes of behaviour (a tailored Code of Conduct for PNG and tailored safeguarding training has been developed and rolled out).</p> <p>In addition, a member of the PSWW Leadership team has specific oversight for the operations in PNG and together with the PSWW Leader, travels to PNG regularly to provide supervision and support. Key risks and issues in PNG, including those of a safeguarding nature, are well understood and are monitored on a regular basis by the PSWW Leadership team.</p> <p>Our interviews with Presentation Sisters in PNG indicated that whilst PNG has the <i>Lukautim Pikinini Act</i> (2009) to ensure and protect the rights and wellbeing of children, the requirements of child safeguarding are still not well understood or communicated throughout the PNG community. Implementation of the NCSS in entirety in these jurisdictions would require significant support and assistance from the PSWW leadership team.</p> <p>This will be particularly relevant should PSWW decide to undertake formal ministries under its own governance in PNG.</p>	
Recommendation	<p>We recommend PSWW develops a staged implementation plan for the application of the NCSS in PNG, focusing on the following:</p> <ol style="list-style-type: none"> The documentation of a formal Risk Management Plan for PNG (refer recommendation #4) to facilitate monitoring of key child safeguarding risks and required mitigation activities; Ensuring appropriate recruitment practices are in place, including Working with Children Checks or equivalent background checks, for staff or volunteers working with PSWW in PNG; and The development of an appropriate and child-friendly complaints handling policy and incident management procedure. <p>We also recommend that PSWW reach out to local networks of child focused organisations within PNG to assist with the implementation of safeguarding practices appropriate to the context of the specific jurisdiction.</p>	
Agreed PSWW Actions	<p>The PSWW leadership team will be interviewing all PNG Sisters to complete the Risk Register for PNG activities, focusing on each Sister's specific contact with children.</p> <p>In September 2019, the four Sisters on the PNG Leadership team will be meeting in Sydney to undertake training and hold an education session to roll out the NCSS in PNG. The two PNG leadership team Sisters will be gathering questions, concerns, issues and experiences from the local PNG Sisters that may need to be addressed. The two PNG leadership team Sisters will follow up with the PNG community when they return to PNG, with further support and guidance provided from the Australian Leadership team as required.</p>	
Responsibility	Sr Anne Lane, Congregational Leader	
Due date	30 September 2019 for PNG Risk Register Ongoing for implementation of NCSS requirements in PNG	

Recommendation #3		Priority 2
Criterion 1.4 - A Code of Conduct provides guidelines for personal on expected behavioural standards and responsibilities		
Details of finding	<p>PSWW has a Code of Conduct that has been formally rolled out to the Sisters and which is required to be signed and returned. The following points were noted:</p> <ul style="list-style-type: none"> • The Code of Conduct has not yet been extended to the staff of PSWW. Whilst we acknowledge that PSWW has a small team of staff (approximately 6 in total) and that the majority of the staff are not child facing, a consistent requirement regarding expected behaviour should be applied to both staff and members of the congregation. • The Code of Conduct should refer to consequences for breaches of the Code and subsequent disciplinary actions. • Whilst the Code of Conduct has been recently updated, there is no regular review schedule in place. • The Code of Conduct does not reference e-safety. • The Code of Conduct is not publicly available. 	
Recommendation	<ol style="list-style-type: none"> 1. The Code of Conduct should be rolled out to all staff, together with a brief training session on expected codes of behavior, including safeguarding requirements (refer recommendation #9). Staff should be required to sign and return the Code of Conduct as acknowledgement of their understanding of the requirements. 2. The Code should be updated to include consequences for breaches of expected behavior and references to related disciplinary procedures. 3. The Code of Conduct should be subject to regular review and update and should be included in the review schedule as per recommendation #1. 4. The Code of Conduct should be updated to include expected behavior regarding use of the online environment and e-safety (refer recommendation #10). 5. The Code of Conduct should be published and easily accessible on the PSWW website, together with the Safeguarding Commitment Statement and the Safeguarding Policy (refer recommendation #1). 6. PSWW should regularly seek feedback from its staff and Sisters regarding the application of the Code of Conduct, as well as the Safeguarding Policy, to ensure a range of views and input is obtained and incorporated into these documents, where necessary. 	
Agreed PSWW Actions	<ol style="list-style-type: none"> 1. A plan is in place to roll out the Code to all Staff together with appropriate training. 2. Completed - the Code has been updated. 3. Completed - review schedule now in place. 4. Completed - the Code has been updated. 5. In progress - the Safeguarding Policy together with the Safeguarding Commitment Statement and Code of Conduct will be published on the PSWW website, subsequent to discussion and ratification at the Plenary Leaders' Council. 6. Completed - this will occur through safeguarding training and congregation days. 	
Responsibility	Sr Margaret Barclay, Safeguarding Officer	
Due date	<p>Item 1 - 30 September 2019</p> <p>Item 5 - 31 August 2019</p> <p>Items 2, 3, 4 and 6 - completed - no further action required</p>	

Recommendation #4		Priority 2
Criterion 1.5 The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children		
Details of finding	<p>PSWW has one formal ministry under their governance at this time – the Mount Erin Heritage Centre (the majority of Sisters both in Australia and in PNG work in various ministries under the governance of another organisation.)</p> <p>PSWW has developed a risk management plan and Risk Register for the Heritage Centre, which is comprehensive and adequately focuses on safeguarding risks, specifically in relation to visiting school groups and interactions with the public.</p> <p>Whilst the Safeguarding Policy refers to a Risk Management Policy which is yet to be developed, we are of the view that PSWW, due to its nature and size, does not need a separate Risk Management Policy. PSWW does, however, need a Risk Management Plan at the congregational level, encompassing all of its operations, including individual ministries that Sisters are engaged in. There also needs to be a mechanism in place whereby the risk management plan and Risk Registers are monitored on a regular basis, i.e. at least quarterly.</p> <p>We also note that whilst the Heritage Centre has draft safeguarding protocols which align with the Heritage Centre’s risk management plan, these protocols are yet to be finalised and approved.</p>	
Recommendation	<p>1. A Risk Management Plan and Risk Register be developed at the Congregational level which covers three main areas:</p> <p>a) <i>The general operations of the Sisters in Australia.</i> This should include a process to ensure regular visibility over the ministries and volunteer work conducted by the Sisters, with a view to identifying areas or ministries which are considered “high risk” and which may require more frequent or in-depth monitoring, training or support. NB: where Sisters are working in a ministry under the governance of another organisation (such as a school or other service organisation), PSWW should undertake sufficient due diligence, particularly for Sisters who are working directly with children, to ensure the organisation is appropriately managing the child safeguarding risk exposures relevant to that ministry.</p> <p>b) <i>The general operations of the Sisters in PNG.</i> We note that, as mentioned in recommendation #2 above, the PSWW Leadership team has a strong understanding of the risks of operating in PNG and this is discussed and monitored regularly. However, a formal risk management plan and Risk Register for the PNG activities should be developed.</p> <p>c) <i>The operations of the Mount Erin Heritage Centre.</i> Already in place. We recommend that the Risk Management Plan and Register developed for the Centre be used as a template for the plans and registers required in a) and b) above. The draft safeguarding protocols for the Heritage Centre should also be finalised and approved.</p>	
Agreed Action	<p>a) <i>General operations of the Sisters in Australia</i> - Risk Register now developed and will be monitored on an ongoing basis.</p> <p>b) <i>General operations of the Sisters in PNG</i> - Risk Register in development (see Actions for recommendation #2).</p> <p>c) <i>Operations of the Mount Erin Heritage Centre</i> - Risk Register and safeguarding protocols now finalised, approved and monitored.</p>	
Responsibility	Sr Anne Lane, Congregational Leader	
Due date	<p>Items a) and c) - completed - no further action required</p> <p>Item b) - 30 September 2019 for PNG Risk Register</p>	



Standard 5: Robust human resource management

People working with children are suitable and supported to reflect child safeguarding values in practice

Recommendation #5		Priority 2
Criterion 5.1 Recruitment, including advertising, interview questions, referee checks and personnel pre-employment screening, emphasises child safeguarding		
Details of finding	<p>PSWW does not have a formal recruitment policy given the small number of staff employed (six employees). Whilst the organisation follows the guidelines for religious organisations in recruitment, these have not specifically referenced safeguarding.</p> <p>Last year, a new employee was hired for the Mount Erin Heritage Centre (The Heritage Centre Manager) however there was no reference to safeguarding in the recruitment documentation nor in the employment contract. A formal risk assessment in terms of contact with children was not conducted although we do note that there was consideration of the position's interaction with children and accordingly, a WWCC and Police Check was conducted. In addition, there is no formal position description for this role.</p> <p>We also note that no other staff within PSWW are required to have a WWCC or Police Check.</p>	
Recommendation	<ol style="list-style-type: none"> 1. We recommend that PSWW conducts a risk assessment for all new roles, whether paid staff or volunteers, to ensure that the appropriate safeguarding requirements are incorporated into the advertising, screening and recruitment processes where required. This should include determining and documenting whether a WWCC is required. 2. A position description should be created for all staff roles, which includes safeguarding requirements. 3. As a matter of good practice, PSWW should consider conducting a Police Check for all staff (regardless of role). 	
Agreed Action	<p>PSWW will incorporate the appropriate safeguarding requirements into all future recruitment documentation and has amended its recruitment practices to this effect.</p> <p>Police Checks will be instigated for all staff on a 3 yearly rotational basis, coinciding with the employee's work anniversary.</p>	
Responsibility	Sr Margaret Barclay, Safeguarding Officer	
Due date	Completed - Police Checks to be conducted according to employee work anniversaries	

Recommendation #6		Priority 2
Criterion 5.3 Personnel receive an appropriate induction and are aware of their child safeguarding responsibilities, including reporting obligations		
Details of finding	At the time of the audit, there was no formal induction training provided in relation to safeguarding for staff or volunteers.	
Recommendation	<ol style="list-style-type: none"> 1. The Heritage Centre Manager is developing an induction pack for volunteers who will be working at the Heritage Centre that includes a safeguarding component. Given that these volunteers will be interacting with children, this safeguarding component should include: <ol style="list-style-type: none"> a) the entity's Code of Conduct and child safe policies and procedures b) children's rights c) respect for children, regardless of their individual characteristics, cultural backgrounds and abilities d) safeguarding risk management, including strategies to identify, assess and minimise risk of harm to children e) e-safety (safe use of technology and the online environment) f) how to respond to a disclosure of harm from a child g) complaints processes, including how to respond to a complaint about inappropriate behaviour towards children h) reporting obligations, including reporting to police, child protection authorities, reportable conduct schemes and any other relevant agencies. 2. In relation to office and general staff of PSWW who are not child facing, any new staff should also receive safeguarding training as part of their induction, although this training should be tailored based on the person's role and nature of work (e.g. may not need to cover points d) and f) in as much detail given the staff are not interacting with children). 3. Formal attendance records for induction training should be documented and retained. 	
Agreed Action	<ol style="list-style-type: none"> 1. Heritage Centre Staff and Volunteers have now had, or will soon have, the required induction training. The Heritage Centre Manager will be responsible for ensuring all subsequent new volunteers receive the appropriate induction. 2. PSWW is in the process of organising induction training for PSWW general staff. 3. Formal records of attendance for induction training will be documented and retained. 	
Responsibility	Sr Margaret Barclay, Safeguarding Officer	
Due date	30 September 2019 for all current staff and volunteers	

Recommendation #7		Priority 3
Criterion 5.5 Robust processes exist for screening candidates before and during seminary or religious formation, as well as for ongoing formation, support and supervision of clergy and religious		
Details of finding	The majority of Sisters we interviewed do undertake Professional Supervision on a regular basis and understand its importance and relevance to their ministry. Only one Sister interviewed was not engaging in Professional Supervision and this was due to the difficulty of finding a suitable Supervisor.	
Recommendation	CPSL acknowledges the good work of PSWW in encouraging and promoting as normative the requirement of Professional Supervision amongst its Sisters which is reflected in the strong uptake of Sisters undertaking Professional Supervision on a regular basis. We encourage PSWW to continue to emphasise the importance of Professional Supervision and to provide support and assistance to Sisters who are having difficulty in finding suitable Supervisors through the organisation of group Supervision sessions or other similar mechanisms to fulfil this requirement.	
Agreed Action	Agreed - support will be provided to Sisters in finding a suitable supervisor where required.	
Responsibility	Sr Margaret Barclay, Safeguarding Officer	
Due date	Ongoing as required	



Standard 6: Effective complaints management

Processes for raising concerns and complaints are responsive, understood, accessible and used by children, families, carers, communities and personnel

Recommendation #8		Priority 3
Criterion 6.1 - The entity has an effective Complaints Handling Policy and procedures which clearly outline the roles and responsibilities, approaches to dealing with different types of complaints, reporting obligations and record keeping requirements		
Criterion 6.2 - The entity has a child-focused complaints handling system that is understood by children, families, carers and personnel		
Details of finding	<p>PSWW has a clear and structured approach to complaints handling - there are no active complaints in progress and of the eleven complaints in the Congregation's history, there have been no complaints of child sexual abuse against any of the Sisters.</p> <p>Our review of documentation relating to complaints (the majority of which related to disciplinary measures in schools) indicates that the complaints have been thoroughly investigated, addressed and resolved. We also noted evidence of positive engagement, pastoral care and ongoing support for complainants.</p> <p>Due to the low number of complaints, PSWW does not have a Complaints Register or separate complaints policy, although we note that procedures in relation to complaints, including requirements for mandatory reporting are integrated into the Safeguarding Policy, with clear flowcharts indicating the steps required in responding to complaints.</p> <p>However, given the requirement to maintain records for 50 years, we believe a Complaint Register is required, which could be developed in conjunction with the record keeping policy and protocols as per recommendation #5.</p> <p>In addition, whilst PSWW no longer works directly with children, the complaints procedures should be publicly available. Publishing the Safeguarding Policy on the PSWW website, as per recommendation #1 would satisfy this requirement.</p>	
Recommendation	<p>A Complaints Register be developed which includes:</p> <ul style="list-style-type: none"> • Key principles for record keeping • Deidentified codes for each complaint • Date opened • Date closed • Date for records to be destroyed (minimum 50 years) • Notation when records have been destroyed 	
Agreed Action	<ol style="list-style-type: none"> 1. Complaints procedures are included in the updated Safeguarding Policy which will be published together with the Safeguarding Commitment Statement and Code of Conduct on the PSWW website, subsequent to discussion and ratification at the Plenary Leaders' Council. 2. A Complaints Register will be developed in line with this policy and the recently established record keeping policy. 	
Responsibility	Sr Margaret Barclay, Safeguarding Officer	
Due date	<p>Item 1 - 31 August 2019</p> <p>Item 2 - 30 September 2019</p>	



Standard 7: Ongoing education and training

Personnel are equipped with the knowledge, skills and awareness to keep children safe through information, ongoing education and training

Recommendation #9		Priority 3
Criterion 7.1 - Personnel are trained and supported to effectively implement the entity's Child Safeguarding Policy		
Details of finding	<p>PSWW has provided safeguarding training to the Sisters on regular basis, usually in the form of guest speakers from organisations such as the previous National Committee Professional Standards (NCPS) or similar. However, these training sessions have coincided with PSWW's Congregation Days and the training materials are not kept, so it is not possible to determine exactly what was covered in each session.</p> <p>A formal record of the Sisters' attendance at the training has not been maintained, although it is acknowledged that records of which Sisters attended the Congregation Day in general could be determined if required.</p> <p>In addition, at the time of the audit, safeguarding training had not been provided to PSWW staff or the two lay staff on the Safeguarding Committee.</p>	
Recommendation	<ol style="list-style-type: none"> 1. A training calendar/framework should be put in place to ensure that all Sisters, staff and volunteers receive appropriate safeguarding training. This training should cover: <ol style="list-style-type: none"> a) Code of Conduct and Safeguarding Policy b) Safeguarding risk management, including e-safety c) Reporting obligations in relation to reporting abuse, handling and/or investigating complaints and responding to incidents d) New legislative or policy requirements in relation to safeguarding matters. 2. Formal records of attendance at training should be kept and a system developed to follow up Sisters, staff and volunteers who have not attended training. 	
Agreed Action	A training calendar will be developed for the Sisters, staff and volunteers to ensure the required training is provided and records of attendance will be kept. A process will be implemented to follow up those who have not attended training.	
Responsibility	Sr Margaret Barclay, Safeguarding Officer	
Due date	31 October 2019	

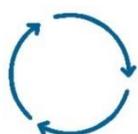


Standard 8: Safe physical and online environments

Physical and online environments promote safety and contain appropriate safeguards to minimise the opportunity for children to be harmed

Recommendation #10		Priority 3
Criterion 8.2 - The online environment is used in accordance with the entity's code of conduct, safeguarding policies and procedures		
Details of finding	<p>PSWW does not have an IT policy which covers online risks or safe use of technology. Computers in the PSWW office are not monitored for appropriate use of web browsing and other applications.</p> <p>In addition, the Code of Conduct does not include standards of behaviour regarding the use of technology or e-safety.</p>	
Recommendation	<ol style="list-style-type: none"> 1. Whilst a separate IT policy is not considered necessary given the small size of PSWW's computer network and infrastructure, the safe use of technology should be covered in a separate section of the Child Safeguarding Policy to clearly set out PSWW's expectations and requirements in this regard. 2. The Code of Conduct should be updated to include standards of behaviour for the use of technology and e-safety (refer also recommendation #3). 3. A process should be established whereby any laptops/computers owned by PSWW and used by PSWW staff or volunteers are monitored for appropriate use and content. This could take the form of an annual check by the party/firm that provides IT services to PSWW or alternatively, PSWW could seek assistance from its education partners who would likely have contacts/services in this field. 	
Agreed Action	<ol style="list-style-type: none"> 1. The Safeguarding Policy will be updated to include the relevant section. 2. The Code of Conduct will be updated to include reference to the appropriate use of technology. 3. PSWW will investigate and liaise with relevant parties with a view to establishing a process for external review/check of PSWW laptops/computers. 	
Responsibility	Sr Margaret Barclay, Safeguarding Officer	
Due date	<p>Item 1 - 30 September 2019</p> <p>Item 2 - Completed - no further action required</p> <p>Item 3 - 31 December 2019</p>	

Recommendation #11		Priority 3
Criterion 8.4 Entities that contract facilities and services to and from third parties have procurement policies that ensure safeguarding of children		
Details of finding	PSWW provides funding for a number of programs which have contact with or minister to children. These funding agreements were created several years ago and do not contain safeguarding clauses.	
Recommendation	It is recommended that when the funding agreements are next renewed, appropriate safeguarding clauses are included, specifying the expectations of PSWW as to how the recipient of the funds will behave with respect to upholding the child safety principles and child safety commitments espoused by PSWW.	
Agreed Action	PSWW will establish a process to review the funding agreements with a view to inserting the required safeguarding clauses at the next expiration/renewal date.	
Responsibility	Sr Margaret Barclay, Safeguarding Officer	
Due date	30 September 2019 (for establishment of planning/review process)	



Standard 9: Continuous Improvement

Entities regularly review and improve implementation of their systems for keeping children safe

Recommendation #12		Priority 3
Criterion 9.1 - The entity regularly reviews and improves child safeguarding practices		
Details of finding	At the time of the audit, the Sisters had not yet developed a Safeguarding Implementation Plan. As the first Catholic entity to undergo an audit of compliance against the NCSS, PSWW will be using the results of the audit to populate a Safeguarding Implementation Plan and have already committed resources to do this.	
Recommendation	A Safeguarding Implementation Plan should be developed and actioned, with target dates identified and monitored.	
Agreed Action	A Safeguarding Plan has been developed and will be used to monitor implementation of the recommendations arising from the audit.	
Responsibility	Sr Margaret Barclay, Safeguarding Officer	
Due date	Completed – no further action required	

Appendix A

COMPLIANCE ASSESSMENT SCALE

The compliance assessment of the entity's performance against each indicator will be determined using a four-point scale, as follows:

	General	Processes	People/Resources
Not Addressed	<ul style="list-style-type: none"> The entity has not addressed the required indicator or is unable to demonstrate that the requirements of the indicator are in place and/or are operating effectively and continuously. 	<ul style="list-style-type: none"> Processes are non-existent. Processes exist however the specific requirements of the indicator have not been addressed. 	<ul style="list-style-type: none"> No resources have been assigned.
Initial/Ad-Hoc	<ul style="list-style-type: none"> The entity has commenced to address the indicator, however processes are ad-hoc or are applied on a case-by-case basis. 	<ul style="list-style-type: none"> Some relevant processes have been implemented which align with the requirements of the indicator, however they are: <ul style="list-style-type: none"> siload; and/or undocumented; and/or inconsistent; and/or lack clarity. 	<ul style="list-style-type: none"> Capabilities vary across the entity. Resources are not formally assigned.
Defined and Developed	<ul style="list-style-type: none"> The entity has addressed the indicator and is in the process of implementing the requirements across the entity. 	<ul style="list-style-type: none"> Relevant processes have been defined and developed, however are yet to be rolled out across the full operations of the entity. 	<ul style="list-style-type: none"> Resources have been assigned and responsibilities defined, however there is no formal training or communication of standard procedures and it is unlikely that deviations will be detected.
Managed and Measurable	<ul style="list-style-type: none"> The entity has demonstrated that indicator requirements are formally embedded and are operating effectively and continuously. 	<ul style="list-style-type: none"> Relevant processes are integrated and coordinated, including remote operations and activities. 	<ul style="list-style-type: none"> Personnel have been trained to detect and report on deviations or break downs in processes. Resources have been assigned to monitor and address non-compliance.

Appendix B

AUDIT FINDING PRIORITIES

The following priority ratings have been used to assess findings arising from this audit:

Priority 1	Priority 2	Priority 3
<p>Gaps or control weaknesses have been identified resulting in non-compliance with the indicator.</p> <p>Mitigation actions are required to be developed and initiated as soon as practicable but no later than 30 days from the issuance of this report, with expected resolution within 3 months.</p>	<p>Progress has been made with respect to implementation of the required indicator, however full compliance is yet to be achieved.</p> <p>Mitigation actions are required to be developed and initiated within 3 months or earlier from the issuance of this report, with expected resolution within 6-9 months.</p>	<p>Issues have been identified which represent minor procedural weaknesses or improvement opportunities with respect to the operation of the indicator.</p> <p>Expected resolution is within 12 months or earlier from the issuance of this report.</p>

Appendix C

GLOSSARY

The definitions for terms used in the National Catholic Safeguarding Standards take into account Australian state, territory and federal laws and relevant regulations, canon law, information from the Holy See, the Royal Commission into Institutional Responses to Child Sexual Abuse, the National Principles for Child Safe Organisations and the Glossary on Sexual Exploitation and Abuse published by the United Nations in 2017.

The glossary does not have any legal force and is meant only to serve as a reference tool for the National Catholic Safeguarding Standards. All terms and definitions are to be read in the context of these Standards alone.

Accessible language	means information is provided in multiple formats for individuals with different levels of English literacy and proficiency, modes of communication, languages and cognitive abilities.
Allegation	means a complaint, still to be verified, claiming or asserting that someone has committed an act of abuse against a child. The term is used interchangeably and in combination with “complaint”.
Australian Catholic Bishops Conference	means the national episcopal conference of the Catholic bishops of Australia. It is the instrumentality used by the Australian Catholic bishops to act nationally and address issues of national significance.
Bishop	means a diocesan bishop and archbishop and the ordinary of an ordinariate in the Latin Church and an eparch in the Eastern Churches.
Canon law	means the revised Code of Canon Law promulgated by His Holiness Pope John Paul II in 1983 and the Code of Canons of the Eastern Churches as promulgated in 1990 and any other universal or particular legislation promulgated by the competent ecclesiastical authority.
Canonical Steward	means the person(s) or other entity canonically responsible for the Catholic Entity.
Catholic Religious Australia	means the public name of the Australian Conference of Leaders of Religious Institutes (ACLRI). It is the peak body for leaders of Religious Institutes and Societies of Apostolic Life resident in Australia.
Child/ren	means individuals under 18 years of age.
Child abuse	<p>there are different legal definitions of child abuse in Australia. Most commonly, the categories of child abuse include sexual, physical, psychological, neglect, ill-treatment, exploitation and exposure to family violence. The following provides general definitions only. For specific legal definitions related to your state or territory please go to: https://aifs.gov.au/cfca/publications/reportingabuse-and-neglect</p> <p>Child abuse, when referenced throughout the National Catholic Safeguarding Standards, includes:</p> <ul style="list-style-type: none"> • physical abuse refers to any non-accidental physically aggressive act towards a child. Physical abuse may be intentional or may be the inadvertent result of physical punishment. Physically abusive behaviours include shoving, hitting, slapping, shaking, throwing, punching, biting, burning and kicking; • sexual abuse refers to a person who uses power, force or authority to involve a child or young person in any form of unwanted or illegal sexual activity. This can involve touching or no contact at all. This may take the form of taking sexually explicit photographs or videos of children, forcing children to watch or take part in sexual acts and forcing or coercing children to have sex or engage in sexual acts with other children or adults;

	<ul style="list-style-type: none"> • neglect refers to a failure by a caregiver to provide the basic requirements for meeting the physical and emotional developmental needs of a child. Physically neglectful behaviours include a failure to provide adequate food, shelter, clothing, supervision, hygiene or medical attention; • psychological abuse refers to inappropriate verbal or symbolic acts and a failure to provide adequate non-physical nurture or emotional availability. Psychologically abusive behaviours include rejecting, ignoring, isolating, terrorising, corrupting, verbal abuse and belittlement; • exposure to family violence is generally considered to be a form of psychologically abusive behaviour, where a child is present (hearing or seeing) while a parent or sibling is subjected to physical abuse, sexual abuse or psychological maltreatment, or is visually exposed to the damage caused to persons or property by a family member's violent behaviour; and • grooming refers to a pattern of behaviour aimed at engaging a child as a precursor to sexual abuse. It includes establishing a 'special' friendship/relationship with the child. Grooming can include the conditioning of parents and other adults to think that the relationship with the child is 'normal' and positive. The process can take as little as a few days or as long as months or even years.
Child Safeguarding Commitment Statement	means a commitment statement describing an entity's commitment to keep children safe from harm. It informs the entity's culture with respect to child safeguarding.
Child safeguarding policies and procedures	means any policies or procedures of the entity that address elements of child safety. For example, but not limited to: <ul style="list-style-type: none"> • recruitment; • risk management; • complaints handling; and • acceptable use (information and communication technology).
Church Authority	means: <ol style="list-style-type: none"> A. the diocesan bishop (or archbishop, as appropriate) of a diocese or his administrator from time to time; B. the Australian major superior in respect of religious institutes; or C. the canonical steward in relation to a particular Catholic entity in respect of other Catholic entities not referred to in (a) or (b) above.
Civic engagement	means individual and collective actions designed to identify and address issues of public concern. Civic engagement includes citizens working together to make a change or difference in the community. The goal of civic engagement is to address public concerns and promote the quality of the community.
Clergy	means the body of those ordained in sacred ministry in the Church. They are either deacons, priests or bishops.
Cleric	means a member of the clergy.
Clericalist/ism	means an attitude toward clergy/religious characterised by an excessive deference and an assumption of their moral superiority. Pope Francis has said of clericalism that it occurs when "clerics feel they are superior, [and when] they are far from the people." He goes on to say that clericalism can be "fostered by priests themselves or by lay persons". When fostered by priests it may be demonstrated in an attitude where clerics see themselves as self-sufficient, superior to and separate from accountabilities of the world beyond the Church. When fostered by lay people it may be demonstrated by thinking that their contributions to the life of the Church are second-rate, or that in all things, surely 'Father knows best'.

	The features of clericalism are not restricted to the ordained (clergy and religious) nor to the Church alone. Abuse of an individual's function, role or power could be considered clericalist and could be exemplified through other attitudes such as not allowing criticism, being didactic rather than dialogical and being controlling rather than caring. It exists in hierarchical institutions such as academia, legal and medical establishments, the police and the military.
Complainant	means any person who makes a complaint that may include any allegation, suspicion, concern, or report of a breach of the entity's code of conduct. It also includes disclosures made to an institution that may be about, or relate to, abuse in the entity's context.
Conflicts of interest	means situations where a conflict arises between a person's official duties and their private interests, which could influence the performance of those official duties. Such conflict generally involves opposing principles or incompatible wishes or needs.
Cultural safety	means an environment that is safe for people of all ethnicities and cultural identities: where there is no assault, challenge or denial of their identity, of who they are and what they need. It is about shared respect, shared meaning, shared knowledge and experience, of learning, living and working together with dignity and truly listening.
Dicastery	means departments of the Roman Curia, including the Secretariat of State, congregations, tribunals, councils and offices.
Diocese	means ecclesiastical jurisdiction under the leadership of a bishop or an archbishop. In this document it is used as an inclusive term, including eparchies, ordinariates and personal prelatures.
Entity	means an entity that has been identified as Catholic by a competent authority within the Catholic Church.
Eparchy	means a term used by the Eastern Catholic Churches to denote ecclesiastical jurisdictions under the leadership of a bishop or an archbishop (also called an eparch or an archeparch).
Exposure to family violence	refer to 'child abuse'.
Formation/formation program	means a program preparing individuals for ordination or profession of vows as well as a life-long journey to the invitation of Christ to proclaim and live the Gospel message within the life of the Church.
Grooming/grooming behaviour	refer to 'child abuse'.
Institutional abuse	means, in the formal setting of an institution, child abuse could be caused by factors such as: <ul style="list-style-type: none"> • a "closed" culture within an organisation where transparency is discouraged; • failure to properly check the backgrounds and interview staff; • inadequate training of staff; • lack of child protection policies; • lack of support of staff by management; • poor communication skills; and/or • poor supervision of staff and children.
Lay/lay person	means members of the Catholic Church other than bishops, priests, deacons and religious.
Leaders	means personnel who are responsible for important governance decisions within a Church entity and/or who lead and coordinate Church improvement initiatives.

Leaders of Religious Institutes	means the person acting in that canonical role (by whatever name) from time to time.
Mentor	means an experienced and trusted advisor or a person who gives a younger or less experienced person help and advice over a period of time.
Ministerial PJP	means a public juridic person established by a religious institute which provides sponsorship and lay leadership for ministries of the religious institute, to ensure their continuation as works of the Catholic Church. The establishing authority for these entities is varied – some ministerial PJPs have been established by the Holy See through the Congregation for Institutes of Consecrated Life and Societies of Apostolic Life and are known as PJPs of pontifical right, others have been authorised by diocesan or provincial bishops. Canon law defines a public juridic person (PJP) as ‘an aggregate of persons or things constituted by the competent ecclesial authority to fulfil a proper function given them in view of the common good’ [Can. 114 §1].
Ministry	means any activity within, or delivered by, an entity that is designed to carry out the good works of the Catholic Church.
Neglect	refer to ‘child abuse’.
Offender	means a person who has admitted abuse or whose responsibility for abuse has been determined by a court of law (criminal or civil), statutory or Church procedure.
Ordinariate	means a non-geographical diocese, an example of which is the Catholic Military Ordinariate of Australia which is administered by a bishop with the faculties of an Ordinary and thus this organisation is known by the term ordinariate.
Overseas clergy and religious	means any cleric or member of a religious institute who is specifically recruited from overseas by a Church Authority or entity.
Personal prelatore	means a canonical structure of the Catholic Church which comprises a prelate, clergy and laity who undertake specific pastoral activities. The first personal prelatore is Opus Dei.
Personnel	means a cleric, member of a religious institute or other person who is employed by the entity or engaged on a contract, subcontract, voluntary or unpaid basis.
Physical abuse	refer to ‘child abuse’.
Position description	means a document which details the role, responsibilities and expectations of a role within an entity and outlines reporting lines.
Professional/pastoral supervision	means a forum for reflection and learning, an interactive dialogue between at least two people, one of whom is professionally trained as a supervisor. The dialogue shapes a process of review, reflection, critique and replenishment for personnel. Supervision is a professional activity in which personnel are engaged regardless of experience or qualification. Supervision assists personnel in their accountabilities for professional standards (including in relation to maintenance of professional boundaries), defined competencies for their role and understanding and implementation of organisational policy and procedures. For clerics and religious, professional/pastoral supervision assists in the maintenance of boundaries of the pastoral relationship and enhances the quality of their ministry. A cleric/ religious’ commitment to conscious and critical reflection on their ministry and ministry experiences is recognised as being important for the wellbeing of the cleric/religious, the people with whom they exercise ministry, the wider Church and the community.
Protective behaviours program	means an age-appropriate structured education program to equip children and young people with the skills and knowledge to enhance their personal safety.

Psychological abuse	refer to 'child abuse'. Religious Institute means an institute of consecrated life, a secular institute or society of apostolic life, and their provinces or equivalent.
Respondent	means a person against whom a complaint is made.
Safeguarding	means measures to protect the safety, human rights and well-being of individuals, which allow people – in this context children – to live free from abuse, harm and neglect.
Safeguarding Committee	means a committee established to advise and support the Church Authority on all matters relating to safeguarding, including the development and implementation of a Safeguarding Implementation Plan and coordination of annual self-audits at a local level. Committee members need relevant and varied professional expertise in relation to, but not limited to safeguarding, child protection, organisational culture and structure, policy development, and need to include lay women and men.
Safeguarding Co-ordinator	means an individual who champions safeguarding and co-ordinates the implementation of the National Catholic Safeguarding Standards within an entity.
Safeguarding Implementation Plan	means a documented plan which articulates actions to be taken across the entity to ensure safeguarding practices are in place. It includes actions, strategies, responsibilities and delegations and tracks review and progress. It is overseen by the Safeguarding Committee.
Seminary	means a centre for the formation and education of students preparing for ordination.
Sexual abuse	refer to 'child abuse'.
Spiritual abuse	means the abuse of a child that is perpetrated by an individual in a position of authority and trust within the Church, supposedly in the name of God. It can cause a child to have lifelong loss of faith and/or feel distanced from the Church.
Substantiated complaint	means allegations proven to be true or supported with evidence.
Third parties	means any individual, group or organisation outside the entity who either contract services and facilities to or from the entity. For example, groups hiring Church facilities for private or public use (for example birthday parties, men's sheds, exercise groups), companies contracted to provide design and print work for an entity, and consultants.
Working with children check	means generic term used in the Standards to denote the statutory screening requirement for people who work or volunteer in child-related work. There is no single national framework setting out requirements for 'working with children' checks. Each state or territory in Australia has its own name, procedures and differences in scope regarding what this type of check entails. They are one part of a Church entity's recruitment, selection and screening processes.