

POLICY FOR SAFEGUARDING CHILDREN AND VULNERABLE ADULTS



Presentation Sisters Wagga Wagga



JULY 2019 VERSION 4.0

Safeguarding Policy

Presentation Sisters Wagga Wagga



The Presentation Sisters Wagga Wagga acknowledge 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.

This is why we have adopted and are implementing a Safeguarding policy that promotes a safe and positive environment for children, staff, volunteers and the vulnerable.

As a Congregation we commit ourselves to do what "*...we can to heal the wounds of abuse and to make the Church a safe place for all.*"

(CRA and ACBC's response to the Royal Commission)

A handwritten signature in cursive script that reads "Anne Lane".

Anne Lane PBVM

Congregation Leader

Presentation Sisters Wagga Wagga

23 July, 2019

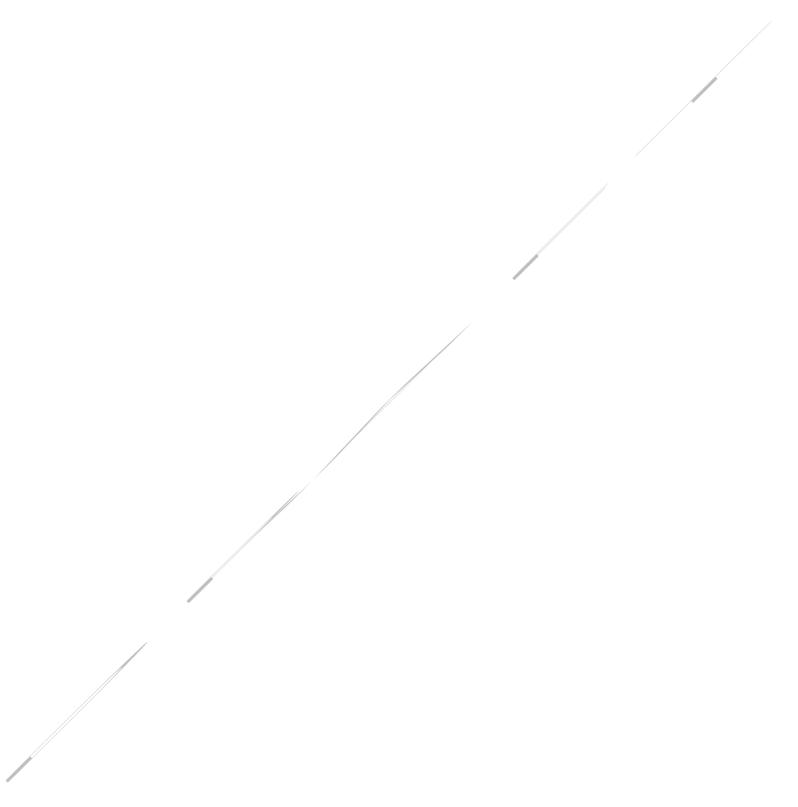


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PRESENTATION SISTERS WAGGA WAGGA

POLICY FOR SAFEGUARDING CHILDREN AND VULNERABLE ADULTS



“There can be no keener revelation of a society’s soul than the way in which it treats its children.”

Nelson Mandela – Former President of South Africa

Preamble

In carrying out the mission of responding to the needs of the time, particularly in relation to the poor and disadvantaged, the Presentation Sisters Wagga Wagga, employees and volunteers may have contact with children, young people and vulnerable adults.

Each Sister, the Administration, and each ministry, programme and activity conducted under the responsibility of the Presentation Sisters, fosters the wellbeing of all children, young and vulnerable adults in their care, respects their dignity, provides for their safety and protects them from harm and abuse.

Any report or suspicion of harm or abuse is handled promptly, with compassion and integrity. All who are involved with children and vulnerable adults in any ministry, whether administrator, staff member, Sister or volunteer, have a duty to ensure safety and protection. The Presentation Sisters actively promote “zero tolerance” in all their safeguarding policies and procedures.

Each person must be familiar with this policy, be aware of other professional and legal requirements and know how to respond when there is knowledge or suspicion of harm to a child or vulnerable adult.

We endorse the response of the Catholic Church who wrote “The ACBC and CRA are grateful to the Royal Commission for the service it has rendered to both the country and Catholic Church, and we thank especially the survivors of abuse who showed such courage in coming forward to bear witness to their suffering. To them and their families we offer our sincere and unreserved apology, and we commit anew to doing whatever we can to heal the wounds of abuse and to make the Church a safe place for all.” *ACBC and CRA Response to the Royal Commission into Institutional Responses to Child Sexual Abuse.* August, 2018 p, 5

Commitments

The Presentation Sisters Wagga Wagga are committed to these principles:

- at all times the safety, well-being and protection from any form of harm or abuse of children, youth and vulnerable adults are paramount;
- all Sisters and other Presentation Sisters' employees and volunteers have a duty of care to support and protect children and vulnerable adults;
- our recruitment, employment and supervision processes to be of high quality in order to select and engage suitable people to work with children and vulnerable adults;
- education and training in recognising abuse, responding to a disclosure and reporting an allegation is provided for all engaged in working with children and vulnerable adults, either directly or indirectly.
- if there is suspicion that a child or vulnerable adult is subject to some form of harm or abuse there will be immediate intervention ensuring the person is protected and supported;
- a prompt, compassionate and just response is made on receiving any complaint or notification of harm or abuse (current or historic);
- care is offered to the family of the child or person who may have suffered harm;
- persons involved in an allegation of abuse will be treated with justice and compassion and have appropriate confidentiality maintained.

Legal Obligations and the Relevant Acts

(See Appendix 1)

The NSW Child Protection legislation has two foci – **employment and child**.

The employment focus includes the *Ombudsman Act 1974* and *Child Protection (Working with Children) Act 2012*. The child focus legislation is the *Children and Young Persons (Care and Protection) Act 1998*.

The child focused legislation (1998) requires that we report to the Department of Community Services or the police if we have reasonable grounds to believe that a child or young person is 'at risk of significant harm.'

The Trustees of the Presentation Sisters Wagga Wagga are required to notify the Ombudsman of any reportable allegations or convictions against a Sister, employee or volunteer within 30 days. These matters would already be with the police or Community Services. (See Appendix 4)

Reportable conduct includes any sexual offence or sexual misconduct (including pornography), any assault, ill treatment or neglect of a child, and any behaviour that causes psychological harm to a child.

We are also required to report the investigation findings to the Children's Guardian in matters of sexual and physical abuse and retain the records for at least 30 years.

Church Protocols

The Trustees of the Presentation Sisters Wagga Wagga will ensure that we fully comply with all relevant government legislation and all requirements of the Roman Catholic Church in respect of safeguarding children and vulnerable adults in accord with the following protocols adopted by the Australian Catholic Bishops Conference, namely:

- *Integrity in Ministry (reprinted 2010)* (Principles and Standards for Catholic Clergy and Religious Australia);
- *Integrity in the Service of the Church (September 2011)* (Principles and Standards for Lay Workers in the Catholic Church in Australia);
- *Towards Healing (2010)* (Principles and Procedures in Responding to Complaints against Personnel of the Catholic Church in Australia).
- *National Catholic Professional Standards (2018)*
- *National Principles for Child Safe Organisations – National Framework for Protecting Australia’s Children 2009 -2020*

In accord with the legislation and the protocols above, the Trustees of the Presentation Sisters Wagga Wagga (i.e. the current Leadership Team), will make full disclosure of any allegations of abuse to the appropriate bodies. If the matter is of a criminal nature the police will be informed immediately. (See Appendix 2 and 7)

Each Sister has a copy of *Integrity in Ministry* and *Towards Healing*. In-services on these documents have been held. Sisters in schools in the last twenty years have also attended in-services in their school community. Our *Safeguarding Policy* was distributed in September 2016.

Authority

This Policy has been approved by the Congregation Leader and Congregation Leadership Team, the members of which are at the same time the Trustees of the Presentation Sisters Wagga Wagga. Unless required sooner, the Policy will be reviewed regularly and after the appointment of a new Congregation Leader following the General Chapter.

Definitions

A child is defined as someone who is under the age of 18 years.

A vulnerable adult could be those who are frail and elderly, have a disability, mental health issues or suffered bereavement. It can include those who have a poor understanding of the English language, have significant relationship problems or experience economic hardship.

Application of Policy

This policy applies to each Sister, employee or volunteer who works directly or indirectly in any Presentation Sisters’ ministry and to all other personnel of any Presentation Sisters Congregation Ministry. Each Sister or person working with children must have a current NSW *Working with Children Check* number that has been verified and kept on record. Catholic Religious Australia (CRA) now require all Sisters to obtain a *Working with Children Check*.

Each Congregation Ministry working directly or indirectly with children and vulnerable people is required to develop its own specific set of safeguarding guidelines. These guidelines are supplementary to the Congregation Policy and will be approved by the Congregation Leader and Leadership Team.

Currently, the Congregation has responsibility for one ministry that may involve children and young people – Mount Erin Heritage Centre Wagga Wagga. The primary Safeguarding Policy will

be from the Diocese of Wagga Wagga. As the Presentation Sisters currently have the governance of the Heritage Centre, the Manager will also abide by our Safeguarding Policy and Procedures.

We recognise that any ministry where we may work with children or vulnerable adults has potential risks. We are proactive in assessing and minimising risks so that each child or vulnerable adult feels welcomed, safe and included. The employed manager of the Mount Erin Heritage Centre will undertake annual workshops/seminars related to Safeguarding and Child Protection.

We endeavour to maintain a professional role in all issues concerning children and vulnerable adults. The management of professional boundaries will ensure that everyone is protected from misunderstandings and we will promote transparency and accountability in working with everyone involved in our ministries.

Our *Code of Conduct for our employees and volunteers* reflects a comprehensive approach in our care of children and vulnerable adults and they can be found in the appendices of this document. It also reflects our commitment to develop 'Right Relationships' in our everyday lives.

(See Appendix 5 and 6)

Procedures

Distribution of responsibility

The Congregation Leader and Leadership Team have responsibility for:

- developing, approving and disseminating this policy;
- appointing a person to take responsibility for Safeguarding matters and in implementing the policy;
- evaluating and updating the policy as appropriate or required by changes in legislation; and
- keeping abreast with the latest literature.

The Congregation Leader, as the designated Church Authority, has responsibility to ensure that she:

- supports the Appointee to provide the most appropriate intervention when there is suspicion, allegation or disclosure of harm or abuse to a child or vulnerable person;
- has a written procedure in place to ensure that the requirements of the relevant civil authority in relation to child protection/safeguarding are met;
- seeks advice from the Office of Professional Standards as needed;
- co-operates with any investigation.

The Appointee oversees the day-to-day implementation and management of the policy and answers directly to the Congregation Leader.

The appointee has an obligation:

- to have a knowledge and understanding of all current statutory and church requirements pertaining to safeguarding children and vulnerable adults;
- to ensure that Sisters, employees and volunteers are provided with training and are familiar with our *Safeguarding policies*;

- to ensure that those working with children have completed the applicable screening procedures and checks and that training and ongoing professional development is provided;
- to maintain employment screening and training records;
- to work with the Congregation Leader in response to suspicion, allegation or disclosure of harm to a child or vulnerable person;
- to inform the Leadership Team about any changes in legislation and then work with the Leadership Team to inform the Sisters about any changes to the *Safeguarding* policies.
- Implements the relevant changes recommended by the Royal Commission and CPSL.

Management of Safeguarding at Congregation level

Roles and Responsibilities of the Appointee

The Appointee will oversee the Safeguarding Policy and ensure safe recruitment processes are in place. Training and education will be a priority and records are kept at the Congregation office at Berala. Risk Management policies will be reviewed and personnel will know how to respond to concerns about any allegations of professional misconduct.

Safe recruitment and screening process

All aspects of the recruitment of staff and volunteers emphasise the Presentation Sisters' commitment to safeguarding of children and vulnerable adults. Recruitment documentation and employment contracts have specific reference to safeguarding. There will be a vigorous and vigilant process in the screening of candidates interested in working with us.

Where applicable, a Working with Children Check (WWCC) will be required of candidates who will need to demonstrate that they recognise the importance of boundaries and what constitutes good behaviour around children and vulnerable adults. The candidate would need to demonstrate that they have an understanding of the needs of children /vulnerable adults and be able to respond appropriately to a variety of scenarios. Several references would be required. Ongoing support, supervision and training will be required for those who hold a management position.

(See Appendix 5)

Working with Children Checks

The appointee makes sure that an employee or volunteer whose work may involve contact with children have a *Working with Children Check* number that is verified at the Congregation office at Berala. The data base will include the full name of each person, their date of birth, the WWCC number, when the next check is due, who verified the WWCC on line, the date and the outcome of the verification.

Use of Computers and Internet

We are aware of the many benefits being part of the digital age. Communication, information and research are integral to our Mission.

As Sisters, work colleagues and volunteers we have a duty of care to use all electronic equipment and the internet responsibly. Privacy with personal information will be upheld as well as confidentiality with work related matters.

Our technology usage will always promote human dignity and respectful relationships.

Training

The appointee will also review the *Safeguarding* procedures/Risk Assessments for the Mount Erin Heritage Centre, Wagga Wagga. Their primary policy will be aligned with the Safeguarding Policy for the Diocese of Wagga Wagga.

Induction of volunteers

New volunteers will be inducted by the program coordinator and sign a “*Code of Conduct*” form. An employee/volunteer will not be involved in any ministry until they have undertaken a training program. The program manager at MEHC will take responsibility for supervising any volunteer in their program and ensure that appropriate ongoing training is available to deal with an issue involving the safety and wellbeing of a child/vulnerable person.

Mandatory Reporting

All those involved as employees/co-workers working with children are mandatory reporters of abuse (www.keepthemsafe.nsw.gov.au). The safety of any child is paramount. If a Sister, an employee or volunteer has an allegation made against him or her, he/she will be withdrawn from active duty immediately. The protection of the victim is the most important consideration. The Leadership Team has a written policy on *Responding to an Allegation of Abuse*. (See Appendix 6)

The NSW Ombudsman is responsible for monitoring the handling of reportable allegations and convictions against employees of all government and certain non-government agencies in NSW.

(See Appendix 2, 3 and 7)

Safeguarding and Risk Management

The Presentation Sisters provide a preventative and responsive approach to protecting children and vulnerable adults by ensuring that risks are identified and managed and are clearly set out in the Risk Management Policy.

The process includes identifying a risk, analysing it, ranking and recording steps to reduce that risk and then monitoring (see *Safer Organisations Safer Children* www.checkwwc.wa.gov.au). A ministry that involves working with children and vulnerable adults will require a risk assessment that is documented, filed and reviewed regularly and made publically available.

Responding to Complaints

Any complaint received by the Presentation Sisters Wagga Wagga will be taken very seriously and will be responded to promptly. The safety, care and concern for the complainant is paramount. These complaints could range from a disclosure of current sexual abuse of a child, a historic complaint or where there is a breach of the *Code of Conduct*.

The Congregation Leader will notify the appropriate authorities so that the investigation can be carried out with objectivity and fairness. In the case of a criminal investigation, the police will be informed immediately. Depending on the nature of the complaint and risk assessment, the person against whom the allegation has been made may be “stood aside” during the investigation.

In accordance with the CPSL Guidelines, clear information about the investigative process will be given to the respondent with outcomes given in writing. A respondent also has a right to a review.

The Congregation Leader will ensure that all those involved in a Safeguarding Matter or a breach of the Code of Conduct will be given support.

Records of any notifications and action plan will be completed as part of the process and be filed at our office at Berala in the safe. Confidentiality is paramount.

(See Appendix 2, 3, 7 and 8)

Reporting process for historic cases of alleged abuse

If a Sister, employee, co-worker or volunteer receives a complaint about alleged historic abuse, it is important that the Congregation Leader is informed immediately and will respond according to any legislative requirements. Depending on the nature of the complaint, the Congregation Leader would offer a pastoral meeting to listen to the complaint and a response would depend on the needs to the person.

(See Appendix 7)

General Training

Understanding and recognising abuse and harm, and the risks

All Sisters and personnel working with us need to understand what is meant by “abuse, harm and risk of harm.” Employees and volunteers will be trained bi-annually about Safeguarding matters.

(See Appendix 1)

Confidentiality

The person who is involved in the allegation will also receive support and their right to privacy will be protected. The matter will be dealt with by the Congregation Leader in consultation with appropriate personnel.

If a staff member makes an allegation about another person, that staff member must not disclose or make use of that information except with the authorised personnel as stated within the policy.

The person making the report of alleged abuse will be advised that the report will be investigated and dealt with by appropriate authorities.

This policy was launched in 2016 reviewed in February and June 2019.

(With acknowledgement of Child Protection Policies published by the Marist Brothers Province of Australia, The Australian Province of the Society of Jesus and the Catholic Diocese of Wollongong.)

References

1. Child Protection polices:
 - Marist Brothers Province of Australia;
 - Australian Province of the Society of Jesus; and
 - Catholic Diocese of Wollongong.
2. www.dhs.vic.gov.au, "Good Leadership and Governance in Child Safe Organisations", *Child safe standards toolkit: resource one*, August 2016.
3. www.moores.com.au, "For the Cause, Strategy, Law & Governance for Charities, NFPs & Social Enterprises", *Child Protection Toolkit*, 2 February, 2016.
4. NSW State Legislation and Reporting
www.childwise.org.au/page/41/state-legislation-reporting-nsw
5. Relevant Acts as they apply in NSW:
 - Principle Act :*
 - Children and Young Persons (Care and Protection) Act 1998
 - Other relevant Acts:*
 - Children and Young Persons (Care and Protection Amendment -Parental Responsibility Contracts)
 - Child Protection (Offenders Registration) Act 2000
 - Crimes Act 1900
 - Commission for Children and Young People Act 1998
 - The Ombudsman Act 1974
 - Family Law Act 1975

Appendices

Appendix 1:

Definitions of Abuse and Grooming (taken from the Archdiocese of Brisbane's Safeguarding Policy 2015)

Appendix 2:

Responding and Reporting of Disclosures of Child Abuse (flowchart)

Appendix 3:

Leaders Incident Report

Appendix 4:

Notification Form – Ombudsman NSW

Appendix 5:

Congregation Code of Conduct

Appendix 6:

Responding to an Allegation of Abuse

Appendix 7:

Investigation of an Alleged Incident of Misconduct (flowchart)

Appendix 8:

Record keeping – Integrity in Ministry – Historic and Current Matters

Appendix 9:

Privacy Policy, July 2019

Appendix 10:

Risk Register – Minister of the Presentation Sisters Wagga Wagga, June 2019

Appendix 11:

Risk Register – Mt Erin Heritage Centre Wagga Wagga, June 2019

Appendix 12:

2019 Training for Staff, June 2019

Appendix 13:

Ongoing Education and Training, June 2019

Appendix 14:

Policy and Procedures Review – Continuous Improvement, June 2019

DEFINITIONS OF ABUSE AND GROOMING

PRESENTATION SISTERS WAGGA WAGGA

What is harm?

Harm is any detrimental effect of a significant nature on a person's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. It may be caused by a single act, omission or circumstance; or a series or combination of acts, omissions or circumstances.

The abuse generally involves one or more of four main forms of abuse:

- physical abuse;
- emotional/psychological abuse;
- neglect;
- domestic or family violence; and
- sexual abuse.

Physical Abuse

Physical abuse is any non-accidental physical injury or injuries to a child or adult such as inflicting pain of any sort. It may involve beating, shaking, poisoning, burning or scalding, drowning, suffocating, biting, grabbing hard enough to leave a mark, throwing a person, strangulation, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child or vulnerable adult. Physical abuse, as well as being a result of an act of commission can also be caused through omission or the failure to act to protect.

Emotional/psychological abuse

Emotional abuse is the persistent emotional ill-treatment of a person causing severe and persistent adverse effects on the person's emotional development. It may involve constant criticism, belittling, teasing, constant yelling, withholding praise and affection, exposure of a person to domestic and family violence, conveying that the person is worthless or unloved, inadequate or valued only insofar as s/he meets the needs of another person.

It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond the person's developmental capability, as well as overprotection and limitation of reasonable exploration and learning, or preventing the child or vulnerable adult from participating in normal social interaction.

It may involve causing a person to feel frightened, in danger or exploitation or corruption of the person.

Some level of emotional abuse is involved in all types of ill-treatment of a child or vulnerable adult, though it may occur alone.

Neglect

Neglect is failure to provide the necessary care, aid or guidance to dependent children or adults by those responsible for their care. It becomes apparent in different ways over a period of time rather than at one specific point. It is the persistent failure to provide a person's basic necessities

of life such that his/her health and development are affected. Basic needs include: food, housing, health care, adequate clothing, personal hygiene, hygienic living conditions, timely provision of medical treatment, adequate supervision. Neglect may occur during pregnancy as a result of maternal substance abuse.

Domestic or family violence

Domestic or family violence is behaviour by a person towards another person in a relevant relationship that is physically or sexually abusive, emotionally or psychologically abusive, economically abusive, threatening, and coercive or in any way controls or dominates the second person and causes that person to fear for their safety or well-being or that of someone else. Exposure of a child or vulnerable adult to domestic and family violence can impact on the person's physical, development, psychological and emotional well-being and in this way cause harm.

Sexual abuse

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact including penetrative (for example, rape, buggery or oral sex) or non-penetrative acts (oral sex). It may include non-contact activities such as involving the person in looking at or in the production of pornographic material, watching sexual activities or encouraging the child or vulnerable adult to behave in sexually inappropriate ways.

Children and vulnerable adults can be sexually abused by males and/or females, by adults and by young people. This includes people from all different walks of life.

Sexual abuse is sexual assault, sexual harassment or any other conduct of a sexual nature that is inconsistent with the integrity of the relationship between Church personnel and those who are in their pastoral care.

Grooming

Grooming is deliberate actions by which an offender befriends and establishes an emotional connection with a child or vulnerable adult to lower their inhibitions in order to sexually abuse the person. The relationship is usually maintained in secrecy. Parents and carers can be seriously misled as they may entrust their child to an offender appears to be upright, reliable and responsible.

Sexting

Sexting refers to the act of sending sexually explicit photographs or messages electronically.

Self-harm

Deliberate and voluntary physical self-injury (that is not life-threatening and is without any conscious suicidal intent,) in an attempt to cope with strong feelings such as anger, despair or self-hatred. It may be by direct means including cutting and burning but could also be by engaging in serious risk-taking behaviours such as alcohol/substance abuse, recklessly dangerous physical activities and/or unsafe promiscuity. (NB: Some cases of self harm may be an indication of sexual abuse.)

Risk

A risk is anything that can cause harm or loss to a child or vulnerable adult.

**PRESENTATION SISTERS WAGGA WAGGA
RESPONDING AND REPORTING OF DISCLOSURES OF CHILD ABUSE**

You receive a disclosure of either past or present abuse

Or you witness behaviour of serious concern with a child

Contact the Designated Appointee or the Congregation Leader to discuss the nature of the disclosure
(A factual written description needs to be recorded)

IS THERE A MANDATORY REPORTING OBLIGATION?
(Is the child at risk of significant harm?)

YES

A notification is made by the Congregation Leader/Appointee or Manager of the Ministry.
If the child is in immediate danger contact the police on 000.

If the alleged perpetrator is an employee or volunteer, the person will be immediately suspended from duties.

Document the disclosure and the action taken.
Keep a copy of any paperwork
Ensure that the Office of Professional Standards is notified and seek their advice on any further action.
A copy of all records must be held in the Congregation Office

Ongoing discussion of the case plan. Review Child Protection policies. Consult with appropriate agencies

NO

What is the follow up plan for the child?
Are there other children who may be 'at risk?'
Document the follow-up plan.

If the matter is not reportable but involves an employee or volunteer, an independent investigation will take place.

DoCS Helpline 133 627

Mandatory Reporter Guide – December 2014, <http://community.nsw.gov.au>



Responding to an Allegation of Abuse

Presentation Sisters Wagga Wagga

Introduction

Religious and representatives of the Presentation Sisters Wagga Wagga are in a special position of trust and authority in relation to those who they are ministering to, those in their care, people seeking advice or students at a school.

Any attempt to sexualise a relationship is a breach of trust, an abuse of authority and professional misconduct.

Physical and emotional cruelty also constitutes an abuse of power.

Where a religious, representatives of the Presentation Sisters Wagga Wagga or another person appointed to a position of care by an agency of the Congregation has acted towards a child or young person in a way which causes serious physical pain or mental anguish without any legitimate disciplinary purpose, as judged by the standards of the time when the incidents occurred, then this constitutes abuse.

The Congregation takes these matters very seriously and will not tolerate these behaviours by their religious, employees or volunteers.

Investigation Process

The Leader of a Congregation is responsible for dealing with any complaint brought against a religious, employee or a volunteer if there is an alleged boundary violation, as noted in the Congregation's *Policy for Safeguarding Children and Vulnerable Adults – Presentation Sisters Wagga Wagga*. That is, "Any report or suspicion of harm or abuse is handled promptly, with compassion and integrity."

Under NSW Legislation, whenever potentially "reportable conduct" is identified, an independent investigation is required, and a religious, employee or volunteer will be asked to withdraw from their ministry or employment while this takes place. An employee would continue to be paid during the course of the investigation.

The Congregation Leader will take steps to ensure that all parties are advised to maintain confidentiality throughout the investigation. The process of the investigation will be outlined and communicated to those involved, especially if it is a current situation. There will be a different pathway if this is an historic situation, especially if it involves a person who was a minor at the time of the allegation. Any matters involving alleged sexual abuse will be notified to the police immediately. Depending on the nature of the matter, the Congregation Leader can contact the *Office of the Children's Guardian* and the *NSW Ombudsman*.

If any historic or current abuse issues are raised with another Sister, employee or volunteer, the process of reporting to the Congregation Leader is stated in Appendix 2 of the Presentation Sisters Wagga Wagga Safeguarding document and should be adhered to. If it is not a criminal matter, the Congregation Leader will offer to meet with the complainant, provide support and work on a plan to address the issue.

The Royal Commission Recommendation 16.52 states that the Congregation Leader will undertake a risk assessment. This will focus on *identifying* and *avoiding* and *minimising* further risks to a child or adult who are the subject of the allegation regardless of whether the alleged offender is a religious, employee or volunteer. This will enable a proper investigation of the allegation.

There are draft forms from *The Royal Commission* that will assist the Congregation Leader with her responsibilities in managing a current allegation. These pro-forma documents include the following: *Initial Risk Assessment, Appropriate Support Provided, Ongoing Risk Management and Risk Management at the Conclusion of the Investigation.*

If a serious allegation is made against a Sister, employee or volunteer, the Congregation Leader will work with him/her on a management plan to enable a person to receive both professional and pastoral support during the investigation. This plan will be outlined in a letter from the Leader.

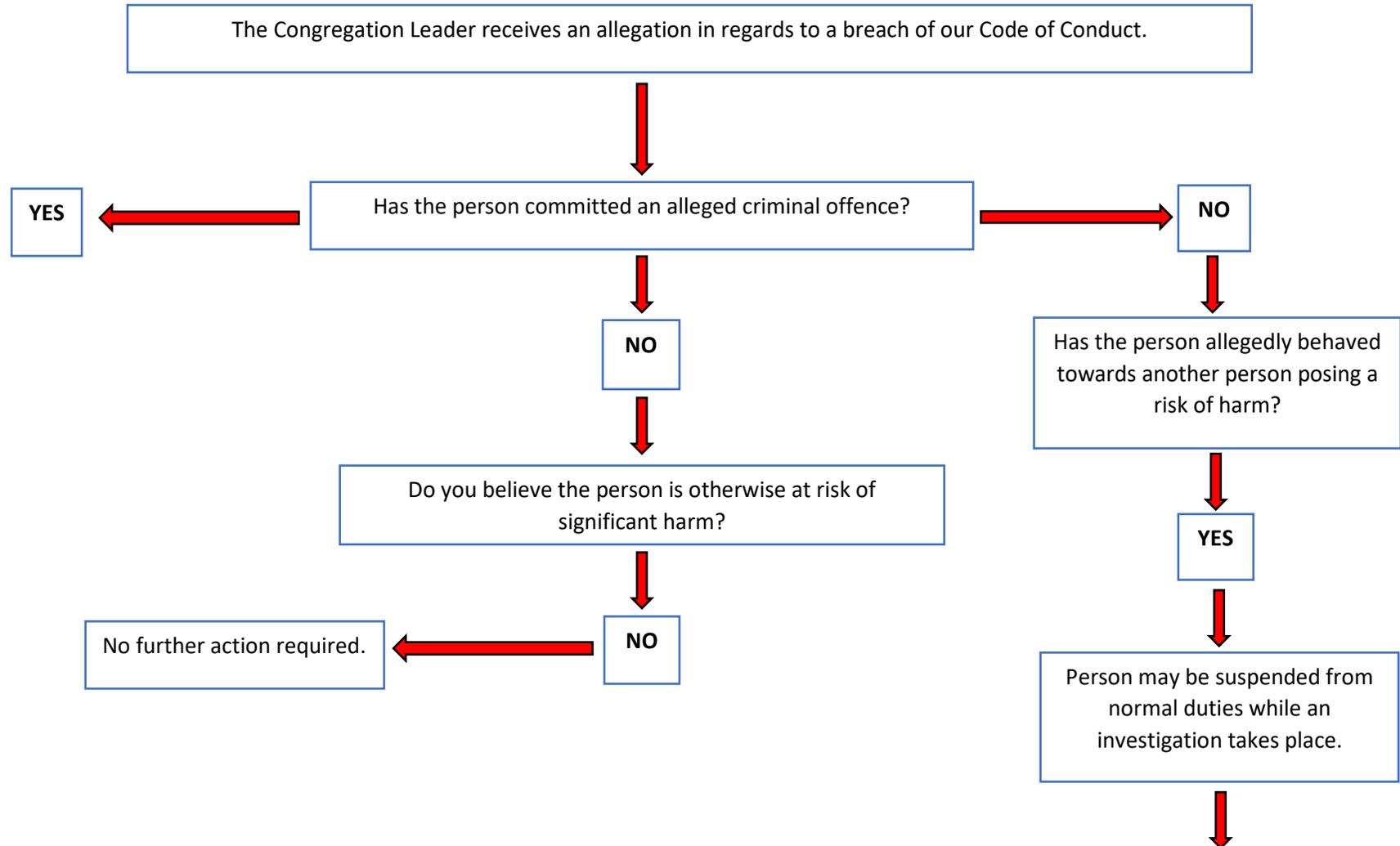
The Congregation acknowledges that this is a difficult time for any party involved in addressing boundary violations and further, that an individual has the right to know the details of the allegation. At all meetings, the alleged abuser has the right to have a support person present with them. A record of the meeting and its outcomes will be kept on file.

Dealing with the Investigation Findings

If an allegation has been unsubstantiated as a result of the investigation, the Sister, employee and volunteer would return to their work. A plan would be formulated with the Congregation Leader to ensure that the findings of the investigation are communicated with those concerned as well as attending to professional and pastoral care needs of the person who carried the accusation.

This policy is in keeping with the Congregation's commitments to the safeguarding and the healing process needed by those who are vulnerable in our society.

Investigation of an Alleged Incident of Misconduct



The steps following an investigation will depend on whether the allegation(s) are substantiated, unsubstantiated or false. The outcome will be in writing.

An investigation will be undertaken about the nature, content and context of an allegation. Confidentiality will be maintained throughout the process. Professional advice and support will be given to those involved.

PRIVACY POLICY

THE PRESENTATION SISTERS WAGGA WAGGA

Policy Statement

It is our policy to operate the Congregation of the Presentation Sisters Wagga Wagga in a manner that consistently meets or exceeds the legal rights of persons in regard to the privacy and confidentiality of information relating to them by ensuring compliance with the provisions of relevant privacy legislation.

Aims and Objectives

As an organisation, we will ensure that only such information as is necessary for Congregational, employment and business purposes is collected and that this information will only be accessible by persons who are specifically authorised to access the information.

Privacy Principles

We acknowledge that the privacy principles are designed to protect the rights of the individual, yet still allow access by particular authorities in specific circumstances and for specific purposes. To meet our obligation to comply with these principles under privacy laws, we will ensure that these principles are adhered to by management of the organisation and all of our members, employees and agents.

We will ensure that we comply with these principles in regard to:

1. The necessity of personal information to be collected, and the means of collection of this information
2. The use or disclosure of personal information about an individual
3. Ensuring that information held is accurate, complete, and up to date
4. The protection of information from misuse, loss and unauthorised access, modification or disclosure
5. The way in which personal information is managed, including the right of individuals to know what type of personal information relating to them is collected, held, used or disclosed
6. Allowing individuals reasonable access to information held about them to the extent allowed by law
7. The identification of individuals
8. The right of individuals to anonymity when entering into transactions where lawful and practicable
9. The transfer of personal information to persons in a foreign country except where allowed by law, and
10. The collection of sensitive information without consent or legal authority.

This Policy is subject to the review of all policies of the Congregation to ensure compliance with current privacy legislation and the practical application of those principles.