

National Catholic Safeguarding Standards

Archdiocese of Brisbane

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 on the Church Reports page of the [CPSL website](#)

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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 released 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 Catholic Archdiocese of Brisbane (Archdiocese).

1.2 Background

The Catholic Archdiocese of Brisbane is the face of the Catholic Church in South East Queensland, comprising 98 parishes and covering 77,000 square kilometres from the Queensland/New South Wales border, north through to Gin Gin and west to Eidsvold and Gatton. The Archdiocese has 285 active or retired clergy and approximately 16,000 paid staff operating out of 40 offices. There are also more than 10,000 volunteers undertaking a variety of ministries within the Archdiocese, including membership on councils and committees; appointment to working groups and planning committees; involvement in care and concern groups; and participation in general parish activities including liturgical and music groups, sacramental programs and youth ministries.

The Archdiocese has 174 Catholic Schools which educate nearly 96,000 students. 141 of these Catholic schools educating 74,000 students are administered by Brisbane Catholic Education, an Agency of the Archdiocese of Brisbane.

Centacare Brisbane is the social services arm of the Archdiocese, working in partnership with various levels of government and the community and responding to local needs from over 200 small service sites throughout South East Queensland. Note that the activities of Brisbane Catholic Education and Centacare Brisbane were out of scope for this audit (refer section 1.3 Audit Approach).

The current Archbishop of Brisbane, Mark Coleridge BA DSS, was installed on 2 April 2012. He is supported by Auxiliary Bishop, Ken Howell and Vicar General, Monsignor Peter Meneely VG.

The Catholic Archdiocese of Brisbane has been assessed as a “Category One” church entity for application of the NCSS (Working with Children). There are 10 NCSS Standards, 49 NCSS Criteria and 111 NCSS Indicators that apply to Category One church entities. For further details of the category system and the Indicators which are applicable, refer to the NCSS documentation available on the Audit Framework page of the [CPSL website](#).

Our assessment of the Archdiocese’s compliance with the Category One Indicators is detailed in Section 2 of this report. Our recommendations for improvement, including the Archdiocese’s management responses are included in Section 3 of this report. The Archdiocese’s management responses have considered the feedback on the audit report from various archdiocesan stakeholders, including the Council of Priests, Curial Advisory Forum, Episcopal Council and the archdiocesan NCSS Implementation Steering Group.

The full Audit Report will also be publicly available on the Church Reports page of the [CPSL website](#).

1.3 Audit Approach

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 respond appropriately 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 designed appropriately and are operating effectively. Accordingly, this report provides a point-in-time assessment of the safeguarding practices implemented by the Catholic Archdiocese of Brisbane and the extent of compliance with the requirements of the NCSS.

The focus of this audit was on ministries and activities conducted in parishes and the parish volunteer network, which are not subject to external assurance processes. Our testing procedures included the following:

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

Audit activities were conducted at the archdiocesan offices in Brisbane and the audit team also visited and assessed the safeguarding practices at 26 parishes (25%) chosen randomly across the Archdiocese (see Appendix B for a list of parishes visited).

As part of this audit, we also met with key personnel at Centacare Brisbane as well as the Brisbane Catholic Education Office. The activities of these entities, including their child safety practices, are subject to existing regulatory requirements and external accreditations. Under the CPSL audit framework, these entities are not re-audited by CPSL, although both entities were required to provide declarations to CPSL regarding the extent of regulation and audit processes that are in place.

The findings, recommendations and management actions in this report pertain solely to the archdiocesan ministries or activities which are not subject to assurance processes, and should not be construed as applying in any way to the activities of Brisbane Catholic Education or Centacare Brisbane.

1.4 Overall Audit Findings

Compliance with the NCSS Indicators has been assessed using a four-point maturity scale.¹

Our assessment indicates that the Archdiocese has fully implemented or has substantially progressed in the implementation of 87 (84%) of the 104² Indicators which are relevant to their operations.

A further 16 Indicators (15%) are in the initial stages of implementation.

One Indicator (1%), relating to the implementation of cultural safety training, is yet to be addressed.

The key findings from the audit are summarised below.

¹ Refer Appendix A for definitions of the maturity scale used for the Compliance Assessment.

² Of the 111 NCSS Indicators applicable to Category One, 7 of these are not relevant to the Archdiocese of Brisbane's operations.

NCSS Standard 1 – Committed leadership, governance and culture

The Archdiocese has a strong, public commitment to the safeguarding of children and has a dedicated Office for Safeguarding Services as well as an NCSS Implementation Committee to implement and monitor the requirements of the NCSS. All parishes reviewed as part of this audit were fully aware of the importance of safeguarding and had either appointed or were in the process of appointing a dedicated Parish Safeguarding Officer.

The Archdiocese's Office of Safeguarding Services has established a Safeguarding Resource Hub which is easily accessed from the archdiocesan website home page.

The Safeguarding Resource Hub houses all of the Archdiocese's safeguarding policies and procedures, including mechanisms to raise concerns or complaints as well as direct links to other government and community resources related to child safety. Whilst the archdiocesan safeguarding policies and procedures are comprehensive, the number of documents in this area has grown over time and could benefit from streamlining and simplification.

Risk management guidelines and templates are in place to assist parishes with assessing key safeguarding risks within their ministries. Whilst all parishes reviewed during this audit were aware of key safeguarding risks and had mitigation strategies in place, not all of the parishes had adequately documented this assessment. In addition, safeguarding risks identified in the parishes are not notified to the archdiocesan office, resulting in a lack of visibility at the archdiocesan level over potential key risks within parishes.

NCSS Standard 2 – Children are safe, informed and participate

NCSS Standard 3 – Partnering with families, carers and communities

NCSS Standard 4 – Equity is promoted and diversity is respected

The Archdiocese has various strategies in place to engage with families and communities on safeguarding matters. This includes providing information on safeguarding in the parish bulletins, specific sermons/discussions on safeguarding during Mass, promotion of safeguarding and participation in Child Protection Week and proactive dissemination of safeguarding information and materials by the parish office and/or Parish Safeguarding Officer.

The parishes reviewed as part of this audit also cited the Archbishop's Safeguarding Strategy video, which is available on the Safeguarding Resource Hub, as a key tool for disseminating safeguarding information across the parishes, and emphasising the Archdiocese's commitment to child safety.

The Archdiocese has recently developed a suite of materials in a child friendly format to inform children about their rights and to provide them with information regarding the Archdiocese's safeguarding practices - this includes age-appropriate information for children to raise concerns or complaints. These materials are being implemented across the parishes, together with strategies for consulting with children about what makes them feel safe and implementing changes and/or exploring new ideas in relation to existing safeguarding practices based on feedback received.

NCSS Standard 5 – Robust human resource management

Formal monitoring systems are in place for the management of working with children checks (Blue Cards) for employees and volunteers and the Archdiocese has recently developed an online volunteer portal to facilitate the checks required for new volunteers who wish to minister within the parishes. The intention of the portal is to reduce the significant administrative burden in managing the Archdiocese's large (>10,000) pool of volunteers.

The Archdiocese assesses safeguarding requirements for all new employment appointments, particularly those roles working with children, however this process is not well documented and needs improvement.

Procedures for management of Blue Cards for clergy are in place, including strong processes to check credentialing for visiting clergy who request to minister in the Archdiocese.

However, improvements are required in relation to documentation maintained for temporary clergy and clerical religious (order priests) appointed to the Archdiocese, specifically regarding formally linking Blue Cards for these individuals to the Archdiocese.

The implementation of professional/pastoral supervision as well as formal performance reviews, as required by the NCSS, are relatively new requirements for the Archdiocese. The Archdiocese is in the process of rolling out procedures in relation to professional/pastoral supervision and is reviewing performance review processes for clergy.

Whilst there are screening procedures and induction processes in place for overseas clergy, these processes need to be formalised and documented.

NCSS Standard 6 – Effective complaints management

The CPSL audit does not re-assess the outcomes of individual complaints. The audit focuses on reviewing current complaint management practices, including policies and procedures in place to prevent, detect, report and respond to all incidents and complaints, including the associated training, awareness and education for all personnel.

Our audit procedures have indicated that the Archdiocese has strong procedures in place for complaints handling, including formal risk management practices to address potential incidents or concerns. However, concerns and complaints are handled by a variety of areas including the Queensland Professional Standards Office (external resource outside of the Archdiocese), Office of Safeguarding Services, Archbishop's Office and the Financial Administration area. These areas have their own list/register of complaints and the Archdiocese could benefit from consolidating the records into one central database.

NCSS Standard 7 – Ongoing education and training

The Archdiocese has a robust and formal training program which encompasses two levels of safeguarding training: 1) Level One safeguarding training, covering fundamental safeguarding concepts; and 2) Level Two safeguarding training, which explores safeguarding in greater depth, including workshopping of safeguarding case studies and scenarios.

Training on cultural safety (i.e. creating culturally safe environments for all children) has not yet been addressed.

NCSS Standard 8 – Safe physical and online environments

Processes to manage third party contractors as well as processes to conduct due diligence on third parties using parish facilities are informal and applied on a case-by-case basis. These processes need to be standardised across the parishes.

Information technology devices within the archdiocesan office have appropriate web filtering systems in place. However, only nine parishes are networked with the archdiocesan office and active monitoring of internet usage and web browsing by personnel is yet to be implemented.

NCSS Standard 9 – Continuous improvement

NCSS Standard 10 – Policies and procedures support child safety

The Archdiocese currently monitors parish compliance with the Archdiocese Safeguarding Policy through an external audit program conducted by a third-party auditing firm, as well as through internal "health checks" conducted by the Archdiocese's Office of Safeguarding Services.

The Archdiocese will be developing a Safeguarding Implementation Plan based on the results of the CPSL audit, which will include updating relevant policies and procedures where required.

The following table shows the overall compliance assessment for each of the Standards.

National Catholic Safeguarding Standard	# NCSS Indicators (Category One)	Not Relevant to Archdiocese of Brisbane (NR)	Assessment of Compliance			
			Managed & measurable (M)	Defined & developed (D)	Initial / Ad hoc (I)	Not addressed (N)
1: Committed leadership, governance & culture	16	2	8	5	1	-
2: Children are safe, informed and participate	5	-	2	1	2	-
3: Partnering with families, carers and communities	6	-	6	-	-	-
4: Equity is promoted and diversity is respected	4	-	2	2	-	-
5: Robust human resource management	23	4	6	6	7	-
6: Effective complaints management	24	-	20	4	-	-
7: Ongoing training and education	9	-	7	1	-	1
8: Safe physical and online environments	10	-	1	6	3	-
9: Continuous improvement	8	1	2	2	3	-
10: Policies and procedures support child safety	6	-	2	4	-	-
TOTAL	111	7	56	31	16	1
			87 (84%)		17 (16%)	

Audit recommendations are classified according to priority and urgency for remediation.³

There are no Priority 1 (high rated) audit recommendations for the Catholic Archdiocese of Brisbane.

There are nine Priority 2 (medium rated) recommendations and nine Priority 3 (low rated) recommendations, which are detailed in Section 3 of this report. Each recommendation also contains the Archdiocese's response to the audit finding, including management actions.

We would like to thank the archdiocesan leadership team and all personnel from the Catholic Archdiocese of Brisbane involved in the audit, for their cooperation and assistance.

³ Refer Appendix B for definitions of the Priority ratings used for audit recommendations.

2. Assessment of Compliance with NCSS Indicators

Standard 1		Committed leadership, governance and culture			
<i>Child safeguarding is embedded in the entity's leadership, governance and culture</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 Whilst the Archdiocese has a suite of safeguarding documents which, when taken together, meet the Indicator requirements, these documents could benefit from review and streamlining. 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; and • actively monitoring safeguarding compliance and risk management. 	✓			
1.2.2	The entity appoints a Safeguarding Committee at the highest level of leadership.	✓			
1.2.3	The entity appoints and promotes the role of Safeguarding Coordinator(s), with clearly defined responsibilities for safeguarding children at the diocesan level.	✓			
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.	Not relevant to current operations			
Observations:					
Requirements of the Indicators are in place. No recommendations for improvement noted.					

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, children from culturally and linguistically diverse backgrounds and children with particular vulnerabilities, for example, children who can't live at home.			✓	
Observations:					
The Code of Conduct documents could benefit from review and streamlining. The Code needs to be updated to take into account the diverse needs of all children. Refer recommendation #2 .					
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.	Not relevant to current operations			
1.5.3	Leaders of the entity manage safeguarding risks effectively, through regular identification, monitoring, reporting and review of risks.		✓		
Observations:					
The Archdiocese has a Risk Management policy and a Risk Register which includes high level safeguarding risks. However, the process for conducting and monitoring risk assessments within parishes varies, and results of the parish risk assessments are not communicated/reviewed at the Archdiocese level. Refer recommendation #3 .					
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 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:					
1.6.2 The Archdiocese has policies and procedures in place for record keeping but needs to update these to include the record keeping principles referred to in Indicator 1.6.2, including the 50-year retention period. Refer recommendation #4 .					

Standard 2		Children are safe, informed and participate			
<i>Children are informed about their rights, participate in decisions affecting them and are taken seriously</i>					
Criterion 2.1 - Children are informed about their rights, including safety, information and participation.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
2.1.1	The entity has age-appropriate strategies to proactively engage with children; seek children's views; consult children about decisions that affect them; and consult children about what makes them feel safe and how this can be recognised and implemented by the entity.			✓	
2.1.2	The entity ensures children are made aware of their rights, including their right to be safe from abuse, and are informed whom to contact if they have concerns about their safety or the safety of their peers.		✓		
Observations:					
2.1.1 The Archdiocese is developing strategies in this area. Refer recommendation #5 .					
Criterion 2.2 - The importance of friendships is recognised and support from peers is encouraged, helping children feel safe and less isolated.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
2.2.1	The entity provides children with age-appropriate information about safe and respectful peer relationships, including through social media			✓	
Observations:					
2.2.1 The Archdiocese is developing strategies in this area. Refer recommendation #5 .					
Criterion 2.3 - Where relevant to the setting and context, children and families may be offered access to abuse prevention programs and related information that is age-appropriate.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
2.3.1	Where relevant, the entity provides children and families with information, access and/or referral to abuse prevention programs, appropriate to the child's age, development, ability and level of understanding.	✓			
Observations:					
Requirements of the Indicator are in place. No recommendations for improvement noted.					
Criterion 2.4 - Personnel are attuned to signs of harm and facilitate child-friendly ways for children to express their views, participate in decision-making and raise their concerns.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
2.4.1	Personnel have the knowledge, skills and awareness to identify potential signs of harm and actively support children to raise any concerns.	✓			
Observations:					
Requirements of the Indicator are in place. No recommendations for improvement noted.					

Standard 3		Partnering with families, carers and communities			
Families, carers and communities are informed and involved in promoting child safeguarding					
Criterion 3.1 - Families and carers participate in decisions affecting their child.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.1.1	The entity supports and encourages families/carers to take an active role in monitoring children's safety when participating in activities.	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 3.2 - The entity engages and openly communicates with families, carers and communities about its child safeguarding approach, and relevant information is accessible.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.2.1	The entity promotes open dialogue and provides a range of ways for families, carers and communities to contribute to discussions about its child safeguarding approach.	✓			
3.2.2	The entity provides families, carers and communities with relevant safeguarding information including contact details of the Safeguarding Committee and/or Safeguarding Co-ordinator(s).	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 3.3 - Families, carers and communities have a say in the entity's policies and practices.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.3.1	Processes are in place to engage families, carers and communities about their views on policies and practices for keeping children safe.	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 3.4 - Families, carers and communities are informed about the entity's operations and governance.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.4.1	The entity ensures families, carers and communities are aware of the roles and responsibilities of personnel providing ministries or activities directly to their children.	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 3.5 - The entity takes a leadership role in raising community awareness of the dignity and rights of all children.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.5.1	Appropriate to the context or setting, the entity actively promotes and/or participates in civic engagement activities/campaigns which promote whole of community awareness of children's rights and child protection.	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					

Standard 4		Equity is promoted and diversity is respected			
<i>Equity is upheld and diverse needs respected in policy and practice</i>					
Criterion 4.1 - The entity actively anticipates children's diverse circumstances and backgrounds, and provides support and responds effectively to those who are vulnerable.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
4.1.1	The entity's Child Safeguarding Policy and practices reflect an understanding, and identification, of diverse circumstances and experiences that increase a child's vulnerability to abuse.	✓			
4.1.2	The entity's Complaints Handling Policy and practices demonstrate an understanding of barriers that prevent children from disclosing abuse and barriers for adults recognising and/or responding to disclosures, and articulates processes that reduce barriers to disclosure.	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 4.2 - All children have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
4.2.1	The entity produces child friendly material in accessible language and formats that promotes inclusion and informs all children of the support and complaints processes available to them.		✓		
Observations: 4.2.1 Complaints handling procedures in age-appropriate and meaningful formats have recently been developed for children. Refer recommendation #5 .					
Criterion 4.3 - The entity pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with a disability, and children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and children of diverse sexuality.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
4.3.1	The entity's Child Safeguarding Policy and practices reflect attitudes and behaviours that respect the human rights of all children and are inclusive and responsive to diverse needs.		✓		
4.3.1 The Code of Conduct needs to be updated to take into account the diverse needs of all children. Refer recommendation #2 .					

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; and where appropriate to the role, an understanding of children's developmental needs and culturally safe practices. 			✓	
Observations:					
While we noted no breaches of legislative requirements, the Archdiocese is yet to include child safeguarding requirements in all aspects of its advertising and recruitment procedures, including for volunteers. Refer recommendation #6 .					
Criterion 5.2 - Relevant personnel (including all seminarians, clergy and religious) 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 is implemented that ensures: <ul style="list-style-type: none"> personnel have a current working with children check as required by legislation, prior to working with children; and where a working with children check is not required by legislation, other background checks for personnel are conducted 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:					
5.1.1/5.2.2 There is potential to scale back the screening requirements for volunteers. In addition, record keeping policies need to be updated to require retention of screening information for a minimum of 50 years (as per NCSS Indicator 1.6.2). Refer recommendation #7 .					
Criterion 5.3 - Personnel receive an appropriate induction and are aware of 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:					
Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 5.4 - Ongoing supervision and people management is focused on child safeguarding.					
		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.4.1	Support, mentoring, oversight and professional supervision processes for personnel include child safeguarding.	✓			
5.4.2	Annual performance reviews for personnel include child safeguarding responsibilities relevant to their role.		✓		
Observations:					
5.4.2 Performance review processes are informal for volunteers. Refer recommendation #8 .					
Criterion 5.5 - Robust processes exist for screening candidates before and during seminary and 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 for seminary/formation programs does not continue through to ordination/profession of vows.			✓	
5.5.2	Seminary and initial formation programs have robust screening processes for candidates for religious ministry, including external psychological and psychosexual assessments.	Out of scope for this audit			
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 six 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 final profession.		✓		
Observations:					
5.5.1 The Archdiocese has a defined process initiated through the Vocations Office for selection of candidates for seminary programs, however was unable to provide copies of relevant documentation for audit.					
5.5.3 Processes for monitoring and support relating to professional supervision for clergy have been developed and are being implemented. Refer recommendation #9 .					
5.5.4 Processes for annual performance appraisals for clergy are currently being developed. Refer recommendation #9 .					
5.5.5 Mentoring is in place for newly ordained priests, however the mentorship period needs to be standardised in line with the NCSS requirements. Refer recommendation #9 .					
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.	Out of scope for this audit			
5.6.2	Seminary and initial formation programs ensure promotion of pastoral responses to victims/survivors of sexual abuse.	Out of scope for this audit			

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.	Out of scope for this audit			
Observations:					
Brisbane Archdiocese does not have sole governance over any seminaries. Candidate assessment processes will be reviewed as part of a separate audit focusing specifically on seminaries and theological colleges.					
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 and Church jurisdictions.		✓		
Observations:					
5.7.1 There are formal processes in place to monitor movement of clergy and religious. However, improvements are required regarding maintenance of documentation for temporary clergy and clerical religious (order priests), as well as clarification of documentation required for con-celebration practices and clergy providing emergency services from neighbouring dioceses. Refer recommendation #10 .					
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.			✓	
5.8.2	All overseas clergy and religious participate in a Safeguarding Induction program, documented by the entity, before work with children begins.			✓	
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.		✓		
5.8.4	The entity promotes as normative the participation of all overseas clergy and religious in active ministry in no less than six hours of professional/pastoral supervision per year.		✓		
Observations:					
5.8.1/5.8.2 Screening and induction processes for overseas clergy needs to be formalised and documented. Refer recommendation #11 .					
5.8.3 Mentoring is in place for overseas priests, however the mentoring period needs to be standardised in line with the NCSS requirements. Refer recommendation #9 .					
5.8.4 Processes for monitoring and support relating to professional/pastoral supervision for clergy have been developed and are being implemented. Refer recommendation #9 .					

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 clear 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 clear 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:					
6.1.3 The Complaints Management Policy references conflicts of interest but does not provide guidance to manage/address potential or actual conflicts of interest. Refer recommendation #12 .					
6.1.6 Taking complaints from a child is addressed in the Safeguarding Policy Support document and is also covered in the Applied Safeguarding Training but is not referenced in the Complaints Management Policy. Refer recommendation #12 .					
6.1.7 The Archdiocese has policies and procedures in place for record keeping but needs to update these to include the record keeping principles referred to in Indicator 1.6.2, including the 50-year retention period. Refer recommendation #4 .					
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:					
6.2.2 Complaints handling procedures in age-appropriate and meaningful formats have recently been developed for children. Refer recommendation #5 .					

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.	✓			
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.	✓			
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 co-operates 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.	✓			
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.	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					
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.	✓			
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.	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					

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 policies and procedures.		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 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; and • 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:					
Attendance at safeguarding training is recorded, however procedures to follow up those who have not attended training (including clergy) could be further co-ordinated and clarified. Refer recommendation #13 .					
Criterion 7.2 - Personnel receive training to recognise the nature and indicators of child abuse, including harmful behaviours by a child towards another child.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
7.2.1	The entity provides regular training to relevant personnel which equips them with the knowledge to: <ul style="list-style-type: none"> • understand the nature and impact of child abuse; • understand the nature, factors and impact of institutional abuse; • identify risk factors, such as grooming behaviours; and • understand, identify and respond to abusive behaviours by a child towards another child. 	✓			
Observations:					
Requirements of the Indicators are in place. No recommendations for improvement noted.					

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 to child protection authorities; Reportable Conduct Scheme; and reporting to regulatory authorities/government departments. 	✓			
Observations:					
7.3.2 The Archdiocese has policies and procedures in place for record keeping but needs to update these to include the record keeping principles referred to in Indicator 1.6.2, including the 50-year retention period. The Archdiocese then needs to update the corresponding training materials in relation to record keeping requirements. Refer recommendation #4 .					
Criterion 7.4 - Personnel receive training and information on how to build culturally safe environments for children.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
7.4.1	The entity provides cultural safety training to equip relevant personnel to create culturally safe environments for Aboriginal and Torres Strait Islander children and children from culturally and linguistically diverse backgrounds.				✓
Observations:					
7.4.1 Existing training materials do not cover cultural safety. Refer recommendation #13 .					

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 8.1 - Personnel identify and mitigate risks in online and physical environments without compromising a child's right to privacy, access to information, social connections and learning opportunities.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
8.1.1	The entity's safeguarding risk management plan addresses physical and online risks including risks arising from child to child and adult to child interactions, and the nature of physical spaces.		✓		
8.1.2	The entity's policies require the use of safe online applications for children to learn, communicate and seek help .		✓		
8.1.3	Personnel are proactive in identifying and mitigating physical and online risks to children.		✓		
8.1.4	A policy is documented and implemented that ensures where one-to-one interactions between an adult and child take place, they are conducted in an open or visible space, or within the clear line of sight of another adult. This includes ministries / services such as counselling, one-to-one tuition, reconciliation, coaching, spiritual direction and mentoring. Where the sacrament of reconciliation is celebrated using the first form of the Rite of Penance, that is, the Rite for Reconciliation of Individual Penitents, the policy may provide for this to occur in a chapel or other space within a church that is set apart for this purpose, so long as any physical contact between the penitent and the cleric is precluded.	✓			
Observations:					
8.1.1 The Archdiocese has a Risk Management Policy and Risk Register which include high level safeguarding risks. However, the process for conducting and monitoring risk assessments within parishes varies, and results of the parish risk assessments are not communicated/reviewed at the Archdiocese level. Refer recommendation #3 .					
8.1.2 The Archdiocese has a Social Media Policy however this is not well known in the parishes. Refer recommendation #14 .					
8.1.3 Risk assessments conducted in parishes do not include risks around use of the online environment. In addition, not all parishes have implemented strategies to address potential safeguarding risks relating to vesting for children altar servers. Refer recommendation #14 .					
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:					
8.2.1 The Archdiocese has a Social Media Policy however this is not well known in the parishes. Refer recommendation #14 .					
8.2.2 There is limited monitoring of internet usage in parishes and the archdiocesan office. Refer recommendation #14 .					

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 safeguarding risks in the physical environments under its control 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 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.		✓		
Observations:					
8.3.1 The Archdiocese has a Risk Management Policy and Risk Register which include high level safeguarding risks. However, the process for conducting and monitoring risk assessments within parishes varies, and results of the parish risk assessments are not communicated/reviewed at the Archdiocese level. Refer recommendation #3 .					
8.3.2 The Archdiocese has guidelines in place to manage persons of concern or known offenders who may be attending its services and/or activities. However, these guidelines are not well known across all parishes, potentially leading to inconsistent practices. Refer recommendation #15 .					
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 third party 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.			✓	
Observations:					
8.4.1 Processes to manage third party contractors engaged by the Archdiocese or parishes are informal and vary between parishes. Refer recommendation #16 .					
8.4.2 Processes to conduct due diligence on third parties using the parish's facilities are informal and vary between parishes. Refer recommendation #16 .					

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.			✓	
9.1.2	The Church Authority monitors compliance with the National Catholic Safeguarding Standards during systematic visits to parishes, ministries and/or congregational works.		✓		
9.1.3	The Safeguarding Committee co-ordinates annual self-audits at a local level (parishes, ministries and/or congregational works).		✓		
9.1.4	The entity's Child Safeguarding Policy is subject to regular review – at least every three years.	✓			
Observations: The Archdiocese will be developing a Safeguarding Implementation Plan based on the outcomes of this audit. This should include expanding the Archdiocese's monitoring and self-audit program to cover the full NCSS. Refer recommendation #17 .					
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.			✓	
9.2.2	Processes are in place to identify systemic issues or patterns and drive continuous improvement.			✓	
Observations: The Archdiocese does not have a consolidated process to analyse all incidents and complaints. Refer recommendation #18 .					
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 applicable – this is the first audit by CPSL			
9.3.2	The Church Authority reports on findings of relevant reviews of safeguarding policies, procedures and practices to its stakeholders.	✓			
Observations: Requirements of the Indicator are in place. No recommendations for improvement noted.					

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: Refer recommendations #1 to #18.					
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: Refer recommendations #1 to #18.					
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. This process includes consulting with and incorporating advice from experts, children, families, carers and communities.		✓		
Observations: Refer recommendations #1 to #18.					
Criterion 10.4 - The Church Authority and leaders 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 Indicators are in place. No recommendations for improvement 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 policies and procedures.	✓			
Observations: Requirements of the Indicators 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>The Archdiocese has several documents which relate to safeguarding:</p> <ul style="list-style-type: none"> • Safeguarding Policy • Safeguarding Policy Support document • Safeguarding Policy Implementation and Accountability Strategies • Safeguarding Strategy 2018-2020 • Code of Conduct • Code of Ethical Behaviour <p>The following points were noted: Not all parishes were clear about the purpose and interface between each of these documents and there is potential to streamline the documents for easier reference. The Safeguarding Policy Support document outlines the responsibilities of the Parish Priest/local safeguarding representatives/families/children. General volunteers and employees should also be included in this listing to emphasise that safeguarding is everyone's responsibility.</p>	
Recommendation	The Archdiocese should consider updating and streamlining the safeguarding documents as noted above.	
Agreed Action	The Archdiocese Safeguarding Policy and procedures are being reviewed. The above findings are noted and will be considered during the review.	
Responsibility	Office for Safeguarding Services	
Due date	30 June 2020	

Recommendation #2		Priority 2
Criterion 1.4 - A Code of Conduct provides guidelines for personal on expected behavioural standards and responsibilities.		
Details of finding	<p>The Archdiocese has two Codes of Conduct - 1) Code of Conduct; 2) Code of Ethical Behaviour. The following points were noted:</p> <ol style="list-style-type: none"> 1. Not all parishes were clear about the purpose of each of the Codes and there is potential to streamline the documents for easier reference (refer also recommendation #1). 2. The existing Code of Ethical Behaviour includes a commitment to equity, upholding dignity for all and responding to those who are alienated and marginalised, however it does not specifically reference the needs of all children (including Aboriginal And Torres Strait Islander children, children with disability, and children from culturally and linguistically diverse backgrounds). 3. Our audit procedures have indicated that not all clergy have signed and acknowledged the Code. 	
Recommendation	<ol style="list-style-type: none"> 1. The Archdiocese should streamline the Codes with a view to having one Code of Conduct which outlines expected behaviours for interaction with all those who come in contact with, or participate in, activities/ ministries within the Archdiocese, including specific requirements for children and vulnerable adults. 2. The Code should be updated to take into account the needs of all children. 3. All clergy and religious in active ministry under the governance of the Archdiocese (including those who are retired and still capable of ministering) should be required to acknowledge and sign the Code. 	
Agreed Action	<p>The above findings are noted.</p> <p>The Archdiocese is exploring a universal Code of Conduct for all workers (including clergy, religious, employees and volunteers), noting that the application of a universal code will be dependent on potential implications for regulated archdiocesan entities.</p> <p>The resultant code(s) will include the appropriate acknowledgement by personnel as required.</p>	
Responsibility	<p>People & Culture</p> <p>Episcopal Office</p> <p>Office for Safeguarding Services</p>	
Due date	30 June 2020	

Recommendation #3		Priority 2
Criterion 1.5 The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children.		
Details of finding	<p>The Archdiocese has a Risk Management Policy and register which include high level safeguarding risks. A template has been provided to parishes along with guidance on conducting a risk assessment for their key ministries and activities. However, not all parishes reviewed had completed these risk assessments.</p> <p>For those risk assessments that were completed, the documentation adequately described the risk and the proposed mitigation procedures, however the risk assessments were then filed and there was no process for reviewing, monitoring and/or updating the risk assessments on a regular basis.</p> <p>In addition, parishes are not required to submit their risk assessments to the archdiocesan office so there is little visibility at the Archdiocese level over key risk areas within the various parishes and/or the mitigation treatments/support that are required.</p> <p>We also noted that whilst all parishes discussed child safety at their Parish Council (leadership) meetings, it was not always a standing agenda item at these meetings.</p>	
Recommendation	<ol style="list-style-type: none"> 1. All parishes should conduct and document risk assessments for their key activities as soon as possible to ensure that risks are understood and managed. Areas of potential higher risk related to safeguarding such as out of the way toilets and non-visible vesting areas should be specifically addressed and mitigation strategies put in place (refer also recommendation #14). 2. Parishes should ensure that the risk assessments are reviewed on a regular (at least quarterly) basis to determine if there are any changes/new risks arising. This review should be minuted and provided to the archdiocesan Office for Safeguarding Services with a view to identifying areas or ministries which encompass greater risk and which may require more frequent or in-depth safeguarding monitoring, training or support. 3. Parishes should be required to include safeguarding as a standing agenda item for their Parish Council (leadership) meetings, with the requirement to review/monitor their completed risk assessments on a regular (at least quarterly) basis. 	
Agreed Action	<p>Further guidance will be provided to parishes on conducting and documenting risk assessments with special emphasis given to higher risk activities/issues as noted above.</p> <p>The Archdiocese Safeguarding Policy and procedures are being reviewed and recommendations 2 and 3 will be taken into account as part of this review.</p> <p>NB: The capacity of both parishes and the Office for Safeguarding Services to properly satisfy recommendation 2 will need further consideration based on resourcing requirements and consideration will also be given to legislated work, health and safety requirements.</p>	
Responsibility	<p>Office for Safeguarding Services</p> <p>Work Health & Safety</p>	
Due date	30 June 2020	

Recommendation #4		Priority 3
Criterion 1.6 Personnel understand their obligations on information sharing and record keeping.		
Details of finding	<p>Strategy 4 of the Safeguarding Policy Implementation and Accountability Strategies document requires parishes to prepare secure and confidential files for disclosures and/or complaints and retain copies of safeguarding incident report forms. The document recommends that parishes maintain both hardcopy and electronic copies, however a minimum timeframe for retention is not specified.</p> <p>In addition, Strategy 5 of the Safeguarding Policy Implementation and Accountability Strategies document requires all breaches of the Safeguarding Policy to be recorded and stored securely but does not stipulate a minimum timeframe for retention.</p>	
Recommendation	<p>Existing policies and procedures regarding record keeping should be updated to specify a minimum retention period of 50 years, as well as the record keeping principles noted in the NCSS, Indicator 1.6.2.</p> <p>The Archdiocese should then update the associated training materials in relation to record keeping requirements.</p>	
Agreed Action	The Archdiocese Safeguarding Policies and procedures are being reviewed and the above recommendations will be addressed as part of this review. Associated policies will also be reviewed and amended where necessary, taking into account legislated and other record keeping/retention requirements.	
Responsibility	<p>Office for Safeguarding Services</p> <p>Brisbane Catholic Education</p> <p>Centacare Brisbane</p> <p>Communication</p> <p>Information, Communication & Technology</p>	
Due date	30 June 2020	



Standard 2: Children are safe, informed and participate

Children are informed about their rights, participate in decisions that affect them and are taken seriously



Standard 4: Equity is promoted and diversity is respected

Equity is upheld and diverse needs respected in policy and practice

Recommendation #5		Priority 3
Criterion 2.1 Children are informed about their rights, including safety, information and participation.		
Criterion 2.2 The importance of friendships is recognised and support from peers is encouraged, helping children feel safe and less isolated.		
Criterion 4.2 All children have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.		
Details of finding	<p>The Archdiocese has recently developed materials in a child-friendly format to advise children of their rights including how to raise a concern/complaint. These materials were launched during Child Protection Week in September 2019 and are in the process of being implemented in all parishes.</p> <p>The Archdiocese has also started developing strategies for engagement with children and is collating materials and ideas from a variety of sources to assist with this initiative.</p>	
Recommendation	<p>CPSL acknowledges the progress of the Archdiocese in this area.</p> <p>We encourage the Archdiocese to continue its rollout of child-friendly materials as well as development of strategies to seek children’s views, consult children about what makes them feel safe and implement changes as required to safeguarding practices.</p> <p>This should also include providing children with age-appropriate information about safe and respectful peer relationships, including through social media.</p>	
Agreed Action	The Archdiocese will continue the development and progressive rollout of child-friendly information and appropriate strategies to engage with children on its safeguarding practices.	
Responsibility	Office for Safeguarding Services Brisbane Catholic Education Centacare Brisbane People & Culture Communications	
Due date	30 June 2020	



Standard 5: Robust human resource management

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

Recommendation #6		Priority 2
Criterion 5.1 Recruitment, including advertising, interview questions, referee checks and personnel pre-employment screening, emphasises child safeguarding.		
Details of finding	<p>Our review of recruitment documentation for a sample of recently hired employees indicated that there is minimal reference to safeguarding in job advertisements, position descriptions or referee questions.</p> <p>In relation to volunteers, recruitment and screening processes are informal and not documented.</p>	
Recommendation	<ol style="list-style-type: none"> 1. We recommend that the Archdiocese update its recruitment practices to ensure that the appropriate safeguarding requirements are incorporated into the advertising, screening and recruitment processes as required. This should include a documented risk assessment to assess the level of contact with children and determine/confirm the legislative checks/safeguarding requirements that are applicable to that role. 2. A position description should be available for all staff and key volunteer roles, which documents the safeguarding requirements commensurate with that role. 3. The recruitment and screening process for new volunteers needs to be documented and retained within the parishes, giving appropriate regard to assessing the volunteer's suitability for ministry with respect to safeguarding requirements. 	
Agreed Action	The archdiocesan recruitment and screening procedures and related documentation will be reviewed taking into account the above recommendations.	
Responsibility	People & Culture Brisbane Catholic Education Centacare Brisbane	
Due date	Action 1 - 31 March 2020 Action 2 - 30 June 2020 Action 3 - 30 June 2020	

Recommendation #7		Priority 2
Criterion 5.2 Relevant personnel (including all seminarians, clergy and religious) have current working with children checks or equivalent background checks.		
Details of finding	<p>The Archdiocese of Brisbane has a large volunteer pool (over 10,000 volunteers) involved in a variety of ministries across the Church. The following points in relation to Blue Cards and Police Checks for volunteers were noted:</p> <ol style="list-style-type: none"> 1. The Archdiocese has identified 54 roles which volunteers and/or employees can undertake as part of their ministry within the Archdiocese. These roles have been classified into Minimal, Low, Moderate and High risk depending on the level of contact with children and other factors (such as unsupervised access to church property/access to keys, etc). Currently, almost all Moderate and High risk roles as well as a number of Low-risk roles require both a Blue Card and a Police Check. However, some of these roles do not work directly with children and would be unlikely to meet the definition of working with children under the Queensland Working with Children (Risk Management and Screening) Act 2000. In addition, the requirement for many of these roles to have both a Blue Card and a police check could be scaled back without increasing the safeguarding risk. 2. There is no formal record keeping policy which outlines the retention period for screening documentation, although we note that Blue Card records are currently scanned electronically and stored indefinitely. 	
Recommendation	<ol style="list-style-type: none"> 1. The Archdiocese should consider reviewing its Blue Card requirements, and in particular, its Police Check requirements for volunteers to ensure that these are appropriately based on risk and do not result in excess administrative burden or cost on either volunteers or the Archdiocese. 2. Existing policies and procedures regarding record keeping should be updated to specify a minimum retention period of 50 years for Blue Cards and related screening documentation (refer also recommendation #4). 	
Agreed Action	<p>The Archdiocese will review its Blue Card and Police Check screening requirements for volunteers, taking into account recommendation 1 above.</p> <p>The Archdiocese will review relevant policies and procedures in light of recommendation 2, taking into account legislated and other record keeping/retention requirements, particularly those applicable to regulated archdiocesan entities.</p>	
Responsibility	<p>People & Culture Episcopal Office Office for Safeguarding Services</p>	
Due date	30 June 2020	

Recommendation #8		Priority 3
Criterion 5.4 Ongoing supervision and people management is focused on child safeguarding.		
Details of finding	In the larger parishes, performance of volunteers was monitored and discussed with the relevant individual where required, however this process was not documented.	
Recommendation	<p>We acknowledge that many volunteers conduct their activities on an infrequent (once per month) or sporadic (ad-hoc) basis. However, the continued satisfactory performance of these individuals still needs to be monitored to ensure that Church is fulfilling its obligations with respect to review and oversight of personnel, particularly those working with children and/or vulnerable adults.</p> <p>The Archdiocese has developed a brief (one page) performance review template which can be used by parishes to review performance of volunteers and which clearly links to the Safeguarding Code of Conduct. We recommend that this template be used to conduct an annual review for key volunteers and ministry leaders (specifically those requiring working with children checks (Blue Cards) and/or Police Checks) and that these individuals are then allocated the responsibility of monitoring the performance of other support volunteers within their area/pool of ministry.</p>	
Agreed Action	<p>The Archdiocese will review its volunteer performance review processes taking into account the above recommendation.</p> <p>NB: the capacity of parishes to properly undertake the performance review process will also be considered as part of this review.</p>	
Responsibility	People & Culture	
Due date	30 September 2020	

Recommendation #9		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	<p>The following points were noted:</p> <ol style="list-style-type: none"> 1. Processes for monitoring and support related to professional/pastoral supervision for clergy working in the Archdiocese have recently been developed and are being implemented. 2. Appraisals for clergy are informal and conducted on an ad-hoc or as required basis. We understand that formal performance review processes are currently being considered/developed. 3. Mentoring is in place for newly ordained priests and overseas priests - the mentoring period is generally two years. 	
Recommendation	<ol style="list-style-type: none"> 1. We encourage the Archdiocese to continue to emphasise the importance of professional/pastoral supervision for all clergy and to provide support and assistance to those who are having difficulty in finding suitable supervisors - either through the organisation of group Supervision sessions or other similar forums to fulfil this requirement. 2. We encourage the Archdiocese to develop and implement appropriate review processes for all clergy operating under the governance of the Archdiocese and in active ministry. 3. Mentoring periods for new priests within the Archdiocese should be aligned with the requirements of the NCSS - five years for newly ordained priests and two to five years (depending on the circumstances and nature of the appointment) for overseas clergy. 	
Agreed Action	The Archdiocese will continue to work on the implementation of mentoring, supervision and review processes for clergy. The above recommendations have been noted as part of this process.	
Responsibility	Episcopal Office Clergy Support Office	
Due date	30 September 2020	

Recommendation #10		Priority 2
Criterion 5.7 Credentialing and movement of seminarians, clergy and religious is appropriately managed.		
Details of finding	<p>The following points were noted:</p> <ol style="list-style-type: none"> 1. Clerical religious (order priests) appointed to archdiocesan parishes generally only provide a certified copy of their Blue Card. These Blue Cards are not linked to the Archdiocese, which means there is no notification from Blue Card if the Card is subsequently withdrawn/suspended. Similarly, Blue Cards for temporary clergy who are working in the Archdiocese are not linked to the Archdiocese. 2. There is no documented process or risk assessment as to when clergy are no longer required to have a Blue Card. Some retired priests no longer have Blue Cards however the reasoning behind the decision not to renew their Blue Cards has not been appropriately documented. 3. There is lack of clarity/consistency between parishes around concelebration practices and what credentialing checks are required. 4. The need for clergy to provide supporting assistance across neighbouring Dioceses is acknowledged, particularly in situations where urgent ministry is required, e.g. the giving of last rites and other time critical activities. However, there are no documented processes for credentialing checks in relation to these situations. 	
Recommendation	<ol style="list-style-type: none"> 1. A process should be implemented to ensure that Blue Cards for all clergy operating under the governance of the Archdiocese are linked to the Archdiocese. 2. A process should be developed and consistently applied to assist with determining when Blue Cards for clergy are no longer required (e.g. those who are in aged care and do not have the capacity to minister, or those who have had faculties withdrawn). This should include an appropriate notation on the relevant cleric's file. 3. Credentialing requirements for clergy who wish to concelebrate should be confirmed. This includes 1) Brisbane archdiocesan clergy wishing to concelebrate with other Brisbane archdiocesan clergy; 2) Visiting clergy from other Dioceses wishing to concelebrate with Brisbane archdiocesan clergy (taking into account the Province agreement in place for Queensland Catholic Dioceses regarding movement of clergy); and 3) Overseas clergy wishing to concelebrate with Brisbane archdiocesan clergy. 4. Processes for emergency clergy received from neighbouring Dioceses should be confirmed, documented and disseminated to all parishes, including the associated record keeping requirements (i.e. who has attended and what activities were performed). 	
Agreed Action	Processes for administering Blue Cards, criminal history checks and other credentialing requirements for clergy will be reviewed. The above recommendations will be addressed as part of that review.	
Responsibility	Episcopal Office	
Due date	30 June 2020	

Recommendation #11		Priority 2
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.		
Details of finding	<p>Procedures for screening, induction, professional/pastoral supervision and development of overseas clergy are informal and are applied on a case-by-case basis.</p> <p>We also note that agreements for overseas clergy are currently four years plus an option to extend for another four years (to align with the four year Australian visa process). The NCSS require an initial two-year period, with an option to extend.</p>	
Recommendation	<p>The Archdiocese should develop formal procedures for:</p> <ol style="list-style-type: none"> 1. screening and selection of overseas clergy; 2. appropriate induction of overseas clergy, particularly with respect to safeguarding training, prior to active ministry in Australia (refer also recommendation #13); and 3. appropriate review processes and mentoring for overseas clergy (two to five years depending on the circumstances and nature of the appointment) with an option to cancel/suspend the arrangement prior to the expiration of the four-year agreement where performance is not satisfactory. 	
Agreed Action	<p>The Archdiocese will formalise procedures for selecting and screening overseas clergy, including the completion of a safeguarding induction process prior to commencing active ministry.</p> <p>The Archdiocese is in the process of implementing mentoring, supervision and review processes for clergy and will consider the recommendation in point 3 as part of this process.</p>	
Responsibility	Episcopal Office	
Due date	30 June 2020	



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 #12		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	<ol style="list-style-type: none">1. The Complaints Management Policy references conflicts of interest but does not provide guidance to manage/address potential or actual conflicts of interest.2. Taking complaints from a child is addressed in the Safeguarding Policy Support document and is also covered in the Applied Safeguarding Training but is not referenced in the Complaints Management Policy.	
Recommendation	<ol style="list-style-type: none">1. We recommend the Complaints Management Policy be expanded to include guidelines for managing perceived or actual conflicts of interest.2. The Complaints Management Policy should be updated to include reference to processes in place for taking complaints from a child.	
Agreed Action	The Archdiocese will review its complaint management policy taking into account the recommendations above.	
Responsibility	Financial Administrator Episcopal Office People and Culture	
Due date	30 June 2020	



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 #13		Priority 2
Criterion 7.1 - Personnel are trained and supported to effectively implement the entity's child safeguarding policies and procedures.		
Criterion 7.4 - Personnel receive training and information on how to build culturally safe environments for children.		
Details of finding	<p>The following points were noted:</p> <ol style="list-style-type: none"> 1. Whilst failure to attend training is stipulated in Strategy 5 of the Safeguarding Policy Implementation and Accountability Strategies document as a breach of the Safeguarding Policy and is to be addressed with the relevant individual, no deadlines have been stated as to when training needs to be completed prior to disciplinary action being taken. 2. We note that whilst parishes have documented the attendance of the Parish Priest(s) at safeguarding training, there is no overarching process at the archdiocesan level for monitoring attendance at safeguarding training by clergy. 3. Our review of induction processes for overseas clergy indicates that whilst safeguarding training is provided, this is not always attended prior to commencing ministry in Australia (refer also recommendation #11). 4. Existing training materials do not cover cultural safety. 	
Recommendation	<ol style="list-style-type: none"> 1. Guidelines should be developed on the follow-up and action for individuals who do not attend training within a specified period. 2. A process should be developed at the archdiocesan level for monitoring and follow up of attendance at safeguarding training for all clergy. 3. Overseas clergy should be required to attend safeguarding training prior to commencing ministry in Australia. 4. The Safeguarding training materials should be updated to include information on creating culturally safe environments for all children. 	
Agreed Action	<ol style="list-style-type: none"> 1. Non-compliance with safeguarding training requirements will be considered during review of the archdiocesan safeguarding policy and procedures, with a view to establishing clearer guidance on this issue. The Archdiocese will issue parishes with a regular report from the Aurion database which will include data on safeguarding training attendance. 2. The attendance of clergy at safeguarding training will be recorded in the Aurion database and a regular report will be issued to the Episcopal Office to monitor attendance. 3. Overseas clergy will be required to complete level 1 safeguarding training (induction) as part of their overall induction to the Archdiocese and before they commence in active ministry. 4. Safeguarding training will be reviewed and relevant cultural safety content will be included as appropriate. 	
Responsibility	<p>People & Culture Episcopal Office Office for Safeguarding Services</p>	
Due date	<p>Actions 1 and 2 - 30 June 2020 Action 3 - 31 March 2020 Action 4 - 30 June 2020</p>	



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 #14		Priority 2
Criterion 8.1 - Personnel identify and mitigate the risks in the online and physical environments without compromising a child's right to privacy, access to information, social connections and learning opportunities.		
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>The following points were noted:</p> <ol style="list-style-type: none"> 1. Whilst the Archdiocese has a Social Media policy, this policy and the associated requirements around use of social media, are not well known in the parishes. 2. Risk assessments conducted in parishes (refer also recommendation #3) do not include risks around use of the online environment. 3. Not all parishes have implemented separate vesting areas or, where this is not possible, strategies to address and minimise potential safeguarding risks in relation to vesting for children altar servers. 4. There is limited monitoring of the online environment within the Archdiocese and only a small number of parishes are networked with the Archdiocese's IT system. 	
Recommendation	<ol style="list-style-type: none"> 1. The Archdiocese's policy on social media should be re-iterated to all parishes. 2. Parishes should conduct and document risk assessments for their key activities as soon as possible (refer recommendation #3) including the documentation and assessment of online risks where required. 3. All parishes should be reminded of the need to review arrangements for vesting of children altar servers and ensuring potential safeguarding risks are addressed. 4. The Archdiocese should review its monitoring strategies for IT devices under its governance, including the development of appropriate IT monitoring strategies for parishes. 	
Agreed Action	<ol style="list-style-type: none"> 1. The Archdiocese will reiterate its social media policies and procedures to parishes as required. 2. Further guidance will be provided to parishes on conducting and documenting risk assessments, including consideration of online risks and arrangements for vesting of children altar servers as mentioned above. 3. The Archdiocese will review its strategies for monitoring online activity and IT devices under its governance. This will include strategies for monitoring those parishes not connected to the archdiocesan network, with consideration to feasibility issues. 	
Responsibility	Information, Communications & Technology Office for Safeguarding Services Work Health & Safety	
Due date	Action 1 - 30 June 2020 Action 2 - 31 March 2020 Action 3 - 30 June 2020	

Recommendation #15		Priority 3
Criterion 8.3 - Risk management plans consider risks posed by the entity's setting, activities and physical environments.		
Details of finding	<p>The Archdiocese has structured processes in place to manage persons of concern or known offenders who may be attending its services and/or activities, including conducting risk assessments and preparing formal church participation plans where required.</p> <p>However, these processes are not well known in all parishes, which may result in inconsistent treatment of such cases across the Archdiocese.</p>	
Recommendation	<p>We understand the Archdiocese has formal guidelines regarding the management of persons of concern and/or known offenders who may be worshipping in the community and/or attending church events.</p> <p>We recommend these guidelines be distributed to parishes to ensure they are aware of their obligations, including ensuring privacy laws and other relevant regulations are complied with.</p>	
Agreed Action	<p>The Archdiocese will review the guidelines to ensure they satisfy new requirements under the NCSS. The guidelines will be included in the revised archdiocesan safeguarding policy and procedures and made available to parishes.</p>	
Responsibility	<p>Office for Safeguarding Services</p>	
Due date	<p>30 June 2020</p>	

Recommendation #16		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	<ol style="list-style-type: none"> Processes to manage third party contractors engaged by the parishes are informal and vary between parishes. Some parishes require contractors to sign in, others ensure that the contractor is fully supervised, whilst other parishes who have been using the same contractors for a period of time do not have any specific checks or supervision requirements. Processes to conduct due diligence on third parties using the church entity's facilities are informal and vary between parishes. Whilst a standard Facilities Use Agreement exists, not all parishes were aware of this agreement and/or were using it where required. 	
Recommendation	<ol style="list-style-type: none"> The Archdiocese should develop a policy on the due diligence expected for third parties engaged by parishes, particularly where the work would be conducted close or adjacent to a school or other child facility. All parishes should be instructed to use the standard Facilities Use Agreement when hiring parish facilities to third parties. This agreement should contain the appropriate references to safeguarding, including: <ul style="list-style-type: none"> the Archdiocese's expectations on safeguarding and zero-tolerance approach to child abuse; the third party providing surety to the entity that they have policies and procedures in relation to safeguarding children, or where they don't have their own policy, confirmation that they will adhere to the Archdiocese's safeguarding policies and procedures; a letter of compliance from the management of the third party stating that all personnel have current working with children checks (Blue Cards) where required by legislation; and records kept of any third parties using parish facilities, either regularly or occasionally. 	
Agreed Action	<ol style="list-style-type: none"> The Archdiocese will review its processes for due diligence and management of third party contractors and other parties using archdiocesan/parish facilities, with a view to confirming required practices and ensuring consistency across parishes. The Archdiocese will review the Facilities Use Agreement document to ensure that it contains the appropriate references to safeguarding requirements, and re-issue this document with appropriate instructions to parishes. 	
Responsibility	Property & Facilities Evangelisation Brisbane Office for Safeguarding Services	
Due date	31 March 2020	



Standard 9: Continuous improvement

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

Recommendation #17		Priority 3
Criterion 9.1 - The entity regularly reviews and improves child safeguarding practices.		
Details of finding	<p>The Archdiocese will be using the results of the CPSL audit to populate a Safeguarding Implementation Plan and have already committed resources to do this.</p> <p>In addition, the Archdiocese currently monitors compliance through an external audit program (conducted by a third party) as well as internal “health checks” (conducted by the archdiocesan Office of Safeguarding Service) which assess parish compliance with the archdiocesan Safeguarding Policy. This monitoring needs to be expanded to include compliance across the full NCSS.</p>	
Recommendation	<ol style="list-style-type: none"> 1. A Safeguarding Implementation Plan be developed and actioned, with target dates identified and monitored. 2. The Archdiocese should expand its internal monitoring and self-audit program to include compliance across the full NCSS. 	
Agreed Action	<ol style="list-style-type: none"> 1. The Archdiocese will prepare an implementation plan subsequent to the CPSL Audit Report being published. Progress against the plan will be formally tracked and reviewed by the Archdiocese. 2. Internal and external (annual) safeguarding audits will be reviewed and adjusted as appropriate, to measure compliance with the NCSS. 	
Responsibility	<p>Vicar General Office for Safeguarding Services</p>	
Due date	<ol style="list-style-type: none"> 1. 31 January 2020 2. 30 September 2020 	

Recommendation #18		Priority 3
Criterion 9.2 - The entity analyses concerns and complaints to identify causes and systemic failures to inform continuous improvement.		
Details of finding	Concerns and complaints are handled by a variety of areas/personnel including the Queensland Professional Standards Office, Office of Safeguarding Services, Archbishop's Office and the Financial Administration area. These areas have their own list/register of complaints which makes it difficult to identify patterns and trends or identify systemic issues that should be reviewed and addressed at the archdiocesan level.	
Recommendation	Consideration should be given to maintaining a master list or register of concerns and complaints at the archdiocesan level.	
Agreed Action	The Archdiocese is exploring the use of an online complaint management system which will record all concerns and complaints and which will enable the Archdiocese to identify patterns, trends and systemic issues.	
Responsibility	Financial Administrator Episcopal Office	
Due date	30 September 2020	

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"> siloes; 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

PARISHES VISITED

The following parishes were visited during this audit:

Cathedral of St. Stephen Parish, Brisbane	All Saints Parish, Boonah
Our Lady of Victories Parish, Bowen Hills	Our Lady of the Valley Catholic Parish, Laidley
St. Oliver Plunkett Parish, Cannon Hill	St Paul's Parish, Woodridge
Our Lady of Graces Parish, Carina	St Edward the Confessor Parish, Daisy Hill
Guardian Angels Parish, Wynnum	Our Lady of the Rosary Parish, Kenmore
St. John Vianney's Parish, Manly	St Ignatius Parish, Toowong
Moorooka/Salisbury Parish, Salisbury	Mother Of Mercy Parish, Hendra
Holy Spirit Parish, Bray Park	St Joseph's Parish, Nambour
Stanley River Parish, Woodford	St. Brigid's Parish, Nerang
Our Lady Help of Christians Parish, Nanango	Infant Saviour Parish, Burleigh Heads
St Patricks Parish, Gympie	Sandgate Brighton Parish, Brighton
Noosa District Parish	St Joseph/St Anthony Parish, Bracken Ridge
Holland Park/Mt Gravatt Parish, Mt Gravatt	All Saints, Albany Creek

Appendix D

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.