

National Catholic Safeguarding Standards

Christian Brothers Oceania Province

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 Catholic Church in Australia.

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 Christian Brothers Oceania Province (CBOP).

1.2 Background

The Christian Brothers, founded in Ireland by layman and widower Edmund Ignatius Rice, received their mandate from the Catholic Church as a religious congregation in 1820. The Oceania Province of the Congregation is a canonical entity created in 2007 after the amalgamation of the previous five provinces and one region, covering Oceania - Holy Spirit Province, St Francis Xavier Province, St Joseph's Province, St Mary's Province, St Patrick's Province and the Edmund Rice Region of Papua New Guinea. As such, it comprises communities of Christian Brothers and ministries inspired by the Edmund Rice charism which operates throughout the regions of Australia, New Zealand, Papua New Guinea and the Philippines.

The Christian Brothers Oceania Province (CBOP) is governed by the Province Leadership Team, based in Melbourne, Australia. There are 265 Brothers living/working in the Oceania Province.

Historically, the primary work of the Christian Brothers has been the evangelisation and education of youth, including the establishment of primary, secondary and technical schools, orphanages and schools for the deaf. In Australia, all schools owned/operated by the Christian Brothers were transferred in 2007 to Edmund Rice Education Australia (EREA), which now has full responsibility for the administration and governance of the schools. In 2014, EREA became a ministerial Public Juridic Person (PJP) and as a separate legal entity, is subject to external accreditation processes through the various State education and training regulators. The activities of EREA are out of scope for this audit (refer to section 1.3 Audit Approach).

In July 2018, CBOP established Edmund Rice Ministries Oceania (ERMO) to manage and operate the 16 ministries that CBOP still governs. These ministries include the Edmund Rice Camps (organised holiday camps specifically designed for children from marginalised or disadvantaged backgrounds); as well as Community and Justice Centres working with disabled persons, indigenous people, migrants, refugees and asylum seekers in Australia and internationally. Approximately 150 staff and 1,100 volunteers are engaged by ERMO across the Oceania Province. The activities of ERMO are fully in scope for this audit (refer to section 1.3 Audit Approach).

CBOP 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 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 CBOP's compliance with the Category One Indicators is detailed in Section 2 of this report. Our recommendations for improvement, including CBOP's management responses, are included in Section 3 of this report.

The full audit report is also 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 CBOP and the extent of its compliance with the requirements of the NCSS.

Our testing procedures included the following:

- interviews, observations and enquiry with the Oceania Province Leadership Team (OLT), individual Brothers and relevant personnel;
- review of key safeguarding documents, policies and procedures; and
- assessment of the design, and testing of the operation of safeguarding controls, implemented by:
 - ❖ CBOP OLT (relating to safeguarding activities of the religious institute as a whole); and
 - ❖ ERMO (in relation to safeguarding activities for the 16 formal ministries governed by CBOP).

Audit activities were conducted at the Oceania Province office in Melbourne as well as at a sample of five ministries (31%) chosen randomly (see Appendix C for list of ministries visited).

The audit team also interviewed 35 Christian Brothers who are still active or capable of ministering, in relation to how safeguarding activities are applied in their daily work.

In accordance with the audit approach outlined above, the findings, recommendations and management actions in this report pertain only to safeguarding practices and activities related to CBOP as a religious institute, as well as safeguarding practices implemented by ERMO for the 16 formal ministries governed and operated by CBOP.

The comments and matters noted in this report should not be construed as applying in any way to the activities of EREA or other formal ministries in which CBOP participates but does not have governance.

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 CBOP has fully implemented or has substantially progressed in the implementation of 91 (89%) of the 102² Indicators which are relevant to their operations.

There are six Indicators (6%) in the initial stages of implementation. A further five Indicators (5%) are yet to be addressed. These relate to:

1. Inclusion of safeguarding elements in staff and volunteer performance appraisals;
2. Training on the process for pastoral responses to victims/survivors as part of the formation program;
3. Training for personnel on information and record keeping;
4. Development of a Safeguarding Implementation Plan; and
5. Development of a self-audit program.

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, 9 of these are not relevant to CBOP's operations.

NCSS Standard 1 – Committed leadership, governance and culture

CBOP is committed to the safeguarding of children and has a dedicated Safeguarding Co-ordinator and Safeguarding Committee which is responsible for overseeing the implementation and monitoring of the NCSS across the Oceania Province and its ministries.

CBOP has recently updated its Safeguarding Policy to include the requirements of the NCSS. These updates are now finalised and approved by the OLT.

In addition, work has commenced on the implementation of the NCSS in CBOP's ministries in New Zealand, Papua New Guinea and the Philippines. This implementation plan is yet to be finalised and approved by the OLT.

NCSS Standard 2 – Children are safe, informed and participate

NCSS Standard 3 – Partnering with families, carers and communities

CBOP has the opportunity to engage with children, carers and families through its ministry with Edmund Rice Camps.

Children attending these camps are provided with a detailed orientation at the start of the camp which addresses safeguarding requirements. In addition, formal strategies for engaging with carers and families in relation to safeguarding practices have been drafted and are awaiting approval by the OLT.

NCSS Standard 4 – Equity is promoted and diversity is respected

CBOP has robust diversity practices embedded in its ministry with Edmund Rice Camps. Specific camps are run for various cultural groups, and cultural safety is addressed in the training for camp staff and volunteers. Child-friendly complaints materials have been drafted and are in the process of being implemented across all camps.

NCSS Standard 5 – Robust human resource management

Monitoring systems have been developed for the management of working with children checks for the Brothers, employees and volunteers. In addition, CBOP has now updated its advertisements and position descriptions to include safeguarding requirements. Amendments to the recruitment policy and referee checks have also been drafted and are awaiting approval.

Annual performance reviews for employees and key volunteers are not currently documented and do not include reference to safeguarding requirements.

In addition, CBOP is yet to develop a formal process in relation to professional/pastoral supervision and performance review processes for the Brothers.

NCSS Standard 6 – Effective complaints management

The Christian Brothers were the subject of one of the individual case studies during the Royal Commission and have had a history of known offenders, as well as past failings in responding to and reporting of complaints.

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, and the associated training, awareness and education available for all personnel.

CBOP has a dedicated Professional Standards office which manages any complaints raised against the Brothers. In addition, CBOP has recently developed a draft Safeguarding Processes and Procedural Manual for ERMO which outlines complaints handling and reporting procedures for staff and volunteers working in the ministries.

NCSS Standard 7 – Ongoing education and training

Interviews with Brothers, staff and volunteers indicates a strong understanding of the requirements for child safeguarding, including knowledge of the appropriate response should a concern be raised.

Previous safeguarding training has focused on staff and volunteers in the ministry settings of the Province. Brothers were not so extensively included in this training, nor were other Province employees. A formal safeguarding training program has now been developed and will be rolled out across the Province in 2020, focusing on the NCSS and safeguarding policies and practices.

Whilst cultural safety (i.e. creating culturally safe environments for all children) is widely understood and practiced at the camps and ministries, there is currently no specific training on this topic for staff and volunteers.

NCSS Standard 8 – Safe physical and online environments

CBOP has recently implemented an Internet, Email and Computer Use Policy which details its expectations regarding use of technology, including acceptable online conduct and access to external websites. The policy includes provisions relating to CBOP’s monitoring of internet usage and email, and the consequences of breaching the policy.

The management of third-party contractors engaged by CBOP is informal and applied on a case-by-case basis. A process should be developed to ensure relevant safeguarding requirements are acknowledged by all third parties engaged by the sites and ministries.

NCSS Standard 9 – Continuous improvement

CBOP has yet to develop a Safeguarding Implementation Plan. The plan, when developed, will address the actions arising from the CPSL audit.

NCSS Standard 10 – Policies and procedures support child safety

Key policies and procedures relating to safeguarding requirements are in place, however some documents will need updating based on the results of this audit.

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

National Catholic Safeguarding Standard	# NCSS Indicators (Category One)	Not Relevant to Christian Brothers (NR)	Assessment of Compliance			
			Managed & measurable (M)	Defined & developed (D)	Initial / Ad hoc (I)	Not addressed (N)
1: Committed leadership, governance & culture	16	1	12	3	-	-
2: Children are safe, informed and participate	5	-	3	2	-	-
3: Partnering with families, carers and communities	6	1	1	3	1	-
4: Equity is promoted and diversity is respected	4	-	3	1	-	-
5: Robust human resource management	23	4	9	6	2	2
6: Effective complaints management	24	-	23	1	-	-
7: Ongoing training & education	9	-	2	6	-	1
8: Safe physical and online environments	10	1	8	-	1	-
9: Continuous improvement	8	2	1	1	2	2
10: Policies and procedures support child safety	6	-	3	3	-	-
TOTAL	111	9	65	26	6	5
			91 (89%)		11 (11%)	

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

There are no Priority 1 (high rated) audit recommendations for CBOP.

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

We would like to thank the leadership team and all personnel from the Christian Brothers Oceania Province who were 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 Requirements of the Indicators are in place. Some minor recommendations are noted with respect to translation of the commitment statement for overseas ministries, as well as general access to safeguarding documents on CBOP's website. 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 to oversee the effective ongoing implementation of child safeguarding practices, including the Child Safeguarding Policy and related procedures and practices.	✓			
1.2.3	The entity appoints and promotes the role of Safeguarding Co-ordinator(s), with clearly defined responsibilities for safeguarding children at diocesan, religious institute or ministerial PJP 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.		✓		
Observations:					
1.3.2 CBOP has commenced the process of implementing the NCSS within its overseas operations. Refer recommendation #2 .					

Criterion 1.4 - A Code of Conduct provides guidelines for personnel on expected behavioural standards and responsibilities.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.4.1	The Code of Conduct explicitly and equally applies to all personnel and provides guidance on appropriate and expected standards of behaviour of personnel towards children.	✓			
1.4.2	The Code of Conduct is written in accessible language and communicated to personnel, children, families and carers.	✓			
1.4.3	The Code of Conduct takes into account the needs of all children, paying particular attention to Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds and children with particular vulnerabilities, for example, children who can't live at home.		✓		
Observations:					
1.4.3 The Code of Conduct has been updated to take into account the diverse needs of all children, however the updated document has not yet been approved by the CBOP OLT. Refer recommendation #3 .					
Criterion 1.5 - The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
1.5.1	The entity has a clearly documented child safeguarding risk management plan, as part of its overall risk management strategy, which considers actual and potential risks relating to children.	✓			
1.5.2	The entity has appropriate risk management processes in place to assess, evaluate, review and oversee the safeguarding of children participating in, or receiving, ministries offshore including cultural immersions, pilgrimages, solidarity campaigns and world youth days.	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:					
Requirements of the Indicators are in place. No recommendations for improvement noted.					
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 Child Protection & Vulnerable Adult Record Keeping Guidelines have been updated to include retention of safeguarding records for a minimum of 50 years, however the updated document has not yet been approved by the CBOP OLT. 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: Strategies for engagement and consultation with children, carers and families have been drafted but are yet to be implemented. 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: Requirements of the Indicator are in place. No recommendations for improvement noted.					
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: Strategies for engagement and consultation with children, carers and families have been drafted but are yet to be implemented. Refer recommendation #5 .					
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: Strategies for engagement and consultation with children, carers and families have been drafted but are yet to be implemented. Refer recommendation #5 .					
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: Strategies for engagement and consultation with children, carers and families have been drafted but are yet to be implemented. Refer recommendation #5 .					
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 Indicator 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.	Not relevant to current operations			
Observations: N/A					

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 Indicator 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: Child-friendly complaints materials have been drafted but are yet to be implemented. 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.	✓			
Observations: Requirements of the Indicator are in place. No recommendations for improvement noted.					

Standard 5		Robust human resource management			
People working with children are suitable and supported to reflect child safeguarding values in practice					
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. 	✓			
<p>Observations:</p> <p>5.1.1/5.1.2 CBOP has updated its advertisements and position descriptions to include safeguarding requirements. Amendments to the recruitment policy and referee checks have been drafted and are awaiting approval from the CBOP OLT. Refer recommendation #6.</p>					
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.		✓		
<p>Observations:</p> <p>5.2.1 Improvements are required in relation to monitoring of working with children checks for personnel. Refer recommendation #7.</p> <p>5.2.2 The Child Protection & Vulnerable Adult Record Keeping Guidelines have been updated to include retention of safeguarding records for a minimum of 50 years, however the updated document has not yet been approved by the CBOP OLT. Refer recommendation #4.</p>					
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 who are a signatory to a Service Agreement with CPSL are required to participate in the NCSS Introductory Session for Leaders within four months of commencement.	✓			
<p>Observations:</p> <p>5.3.1 Safeguarding training is in the process of being rolled out for all personnel. Refer recommendation #8.</p>					

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 reviews for employees do not include safeguarding elements and performance reviews are not conducted for volunteers. Refer recommendation #9 .					
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.	✓			
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 A process for disclosing to other Church Authorities where a candidate does not continue in the formation program has not yet been established. Refer recommendation #10 . 5.5.3 A policy on professional/pastoral supervision has not been developed for the Brothers. Refer recommendation #10 . 5.5.4 Annual performance appraisals are yet to be implemented for Brothers employed by the Province. Refer recommendation #10 .					
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.	✓			
5.6.2	Seminary and initial formation programs ensure promotion of pastoral responses to victims/survivors of sexual abuse.				✓
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.	✓			
Observations: 5.6.2 The formation program does not include training on the promotion of pastoral responses to victims/survivors. Refer recommendation #11 .					

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: Requirements of the Indicator are in place. No recommendations for improvement noted.					
Criterion 5.8 - Entities which receive overseas clergy and religious for work in ministry have targeted programs for the screening, induction, professional supervision and development of these individuals.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.8.1	Selection and screening procedures for overseas clergy and religious are targeted, thorough and follow, as far as practicable, the same processes as for Australian personnel. This includes the Australian Church Authority obtaining screening information from the International Church Authority.	Not applicable			
5.8.2	All overseas clergy and religious participate in a Safeguarding Induction program, documented by the entity, before work with children begins.	Not applicable			
5.8.3	Overseas clergy and religious are supported with a suitable mentor for at least the first two years of their time in Australia.	Not applicable			
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.	Not applicable			
Observations: There are no Brothers from overseas who are assigned to the Oceania Province.					

Standard 6		Effective complaints management			
<i>Processes for raising concerns and complaints are responsive, understood, accessible and used by children, families, carers, communities and personnel</i>					
Criterion 6.1 - The entity has an effective Complaints Handling Policy and procedures which clearly outline the roles and responsibilities, approaches to dealing with different types of complaints, reporting obligations and record keeping requirements.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
6.1.1	The entity's policies, procedures and practices ensure that all mandatory reporting obligations are met.	✓			
6.1.2	There are documented procedures that provide step-by-step guidance on what action to take for different types of complaints, including breaches of Codes of Conduct, disclosures, allegations or concerns of abuse of a child, be they historic or current.	✓			
6.1.3	There are 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:					
Requirements of the Indicators are in place. No recommendations for improvement noted.					
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	The 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 Child-friendly complaints materials have been drafted but are yet to be implemented. 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 co-ordinator and those appointed to the Safeguarding Committee, receive ongoing support and professional development relevant to their role.	✓			
Observations:					
7.1.1/7.1.2/7.1.3 Safeguarding training is in the process of being rolled out for all personnel. Refer recommendation #8 .					
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:					
7.2.1 Training materials for ministry volunteers and other employees working with children do not cover the following: information on grooming and related behaviours; and identifying and responding to abusive behaviours by a child towards another child. Refer recommendation #12 .					
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	<p>The entity provides training to ensure personnel are aware of their reporting obligations under state/territory legislative requirements including:</p> <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. 	✓			
<p>Observations:</p> <p>7.3.1 Whilst all staff and volunteers working at the camps are aware of the required response to incidents or complaints, the training materials should include understanding the various forms of disclosures that allegations of abuse can take. Refer recommendation #12.</p> <p>7.3.2 Training materials do not cover record keeping requirements. Refer recommendation #12.</p>					
<p>Criterion 7.4 - Personnel receive training and information on how to build culturally safe environments for children.</p>		<p>Managed & Measurable</p>	<p>Defined & Developed</p>	<p>Initial/ Ad-Hoc</p>	<p>Not Addressed</p>
7.4.1	<p>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.</p>		✓		
<p>Observations:</p> <p>Whilst all staff and volunteers working at the camps are aware of the necessity to create culturally safe environments for children, the training materials do not formally cover this topic. Refer recommendation #12.</p>					

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

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.	Not relevant to current operations			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					
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 There are some processes in place to manage third party contractors engaged by the Church entity, however these could be improved. Refer to recommendation #13 .					

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: 9.1.1/9.1.2/9.1.3 CBOP will be developing a Safeguarding Implementation Plan, including monitoring and self-audit processes, w incorporates the actions arising from this audit. Refer recommendation #14 .					
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: CBOP has yet to formalise its process for analysing individual incidents, concerns or complaints. Refer recommendation #15 .					
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.	Not applicable – no such reviews have been conducted to date			
Observations: N/A					

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 recommendation #1 , recommendation #4 and recommendation #6 .					
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 and procedures relevant to safeguarding are readily available and accessible to personnel.	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					
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 processes in place to develop and review its policies and procedures relevant to safeguarding. These processes include consulting with and incorporating advice from experts, children, families, carers and communities.		✓		
Observations: 10.3.1 Refer recommendation #14 . 10.3.2 Refer recommendation #5 .					
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 following points were noted:</p> <ol style="list-style-type: none"> 1. CBOP has recently finalised its Safeguarding Commitment Statement. This document is only available in English at this time. 2. We note that safeguarding documents are prominently displayed on each of the Edmund Rice Camp websites. However, the path to access safeguarding documents on the Province website is not intuitive (Christian Brothers Oceania/Our People/Professional Standards) and requires some effort in browsing the Province website in order to find the required safeguarding documents. 	
Recommendation	<ol style="list-style-type: none"> 1. CBOP should consider translating the Safeguarding Commitment Statement into different languages for distribution within the ministries in Papua New Guinea, the Philippines and other overseas operations as required. 2. CBOP should consider placing a direct link to all safeguarding documents and policies from the home page of the website. 	
Agreed Action	<ol style="list-style-type: none"> 1. Translations of the Commitment Statement have been requested to be undertaken by key staff in PNG and the Philippines for application within those ministries. 2. The path to access the safeguarding documents on the Province website will be raised and addressed with the Safeguarding Committee at its next meeting. 	
Responsibility	Chair of Safeguarding Committee	
Due date	<ol style="list-style-type: none"> 1. 30 June 2020 2. 31 May 2020 	

Recommendation #2		Priority 2
Criterion 1.3 - Governance arrangements facilitate implementation of a Child Safeguarding Policy across the entity's activities.		
Details of finding	<p>CBOP has formal ministries in New Zealand, Papua New Guinea (PNG) and the Philippines. For this audit, we have specifically interviewed personnel and reviewed documents and procedures for the ministry in PNG.</p> <p>Whilst the PNG Director is aware of the NCSS and role of the Safeguarding Co-ordinator from the Oceania Province, there has been no formal briefing in relation to the requirements of the NCSS for personnel in PNG. The PNG Director has noted that the ministry's policies and procedures relating to child protection are more aligned with the PNG Catholic Church's child protection protocol, as well as previously existing Province safeguarding policies and procedures.</p>	

Details of finding cont.	<p>Notwithstanding this, the PNG ministry has a dedicated Child Care Safety and Protection Manager who oversees the safeguarding practices of the ministry. Our discussions with personnel and review of procedures indicate that the staff and volunteers are fully aware of child safety requirements, including the appropriate method of responding and managing incidents or complaints.</p> <p>We note that the ERMO Safeguarding Co-ordinator has drafted an International NCSS Implementation Plan for the ministries in PNG, New Zealand and the Philippines. The plan is divided into phases, including an introduction to the NCSS, staff and volunteer training and progressive implementation of NCSS requirements, however is yet to be approved by the CBOP OLT.</p>
Recommendation	<p>We recommend that CBOP finalises the NCSS Implementation Plan for overseas ministries as soon as possible. The Implementation Plan should also be updated to include the following:</p> <ol style="list-style-type: none"> discussion on the recently approved CBOP Risk Management Framework and the requirements around identification, monitoring and reporting of key child safeguarding risks and mitigation activities as part of this framework; and a review of recruitment practices, to ensure the required working with children checks or equivalent background checks and in place and monitored for staff and volunteers in the overseas ministries. <p>In addition, the overseas ministries should be required to report on the progress of their implementation of the NCSS, as well as providing regular reports to the CBOP OLT regarding the ministry's safeguarding practices.</p>
Agreed Action	<p>The Province Risk Management Framework and the NCSS Implementation Plan for overseas ministries will be reviewed in line with the recommendation.</p> <p>Periodic reports from the overseas ministries will be included in reports from the Safeguarding Officer to the OLT & ERMO Board.</p>
Responsibility	<ol style="list-style-type: none"> Chair of Safeguarding Committee Province Deputy Leader
Due date	30 June 2020

Recommendation #3		Priority 2
Criterion 1.4 - A Code of Conduct provides guidelines for personnel on expected behavioural standards and responsibilities.		
Details of finding	CBOP has recently updated the Code of Conduct to take into account the diverse needs of all children, however the updated document is subject to the review of the Safeguarding Committee and the Policy Coordination Group, before receiving final approval by the CBOP OLT.	
Recommendation	The Code of Conduct should be approved by the CBOP OLT, rolled out to all personnel and ministries and made publicly available on the website.	
Agreed Action	The Code of Conduct has now been approved and made publicly available on the website. Training on the Code of Conduct will be rolled out during 2020.	
Responsibility	Chair of Safeguarding Committee	
Due date	31 December 2020	

Recommendation #4		Priority 3
Criterion 1.6 - Personnel understand their obligations on information sharing and record keeping.		
Details of finding	<p>The Province has a detailed Child Protection & Vulnerable Adult Record Keeping Guideline which is based on the Australian Privacy Principles and includes specific requirements around record keeping and information sharing.</p> <p>The guideline has recently been updated to include the retention of safeguarding records for a minimum of 50 years, however the updated document is subject to the review of the Safeguarding Committee and the Policy Coordination Group, before receiving final approval by the CBOP OLT.</p>	
Recommendation	The updated Child Protection & Vulnerable Adult Record Keeping Guideline should be approved by the CBOP OLT and rolled out to all personnel and ministries.	
Agreed Action	A separate guideline for the retention of safeguarding documentation has been developed. Once approved by the CBOP OLT, it will be disseminated to all personnel.	
Responsibility	Chair of Safeguarding Committee	
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 3: Partnering with families, carers and communities

Families, carers and communities are informed and involved in promoting child safety



Standard 4: Equity is promoted and diversity is respected

Equity is upheld and diverse needs respected in policy and practice

Recommendation #5		Priority 2
Criterion 2.1 - Children are informed about their rights, including safety, information and participation.		
Criterion 3.1 - Families and carers participate in decisions affecting their child.		
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 following points were noted:</p> <ol style="list-style-type: none"> 1. There is limited direct engagement by ERMO staff with families/carers of the children who attend Edmund Rice Camps. Most children are referred to the camps by external welfare agencies and the camp's main interaction is with the referring agency. <p>We note that Edmund Rice Camps South Australia has developed some information booklets that are provided to families/carers of camp participants, as well as to the families of the camp's volunteers. The ERMO Safeguarding Co-ordinator is in the process of reviewing these materials to develop a standard information booklet that will be used to engage with families and carers who attend Edmund Rice Camps.</p>	

Details of finding cont.	<p>2. The ERMO Safeguarding Co-ordinator has also drafted age appropriate safeguarding information materials for distribution and use by all ERMO ministries and services. These include posters for children on keeping safe, the rights of the child and how to raise a concern whilst at camp. A survey form for participants and parents/carers has also been developed which will be sent out after each camp to provide further engagement and obtain feedback on camp activities, including safeguarding practices.</p> <p>These materials and documents are subject to the review of the Safeguarding Committee and the Policy Coordination Group, before receiving final approval by the CBOP OLT.</p>
Recommendation	<p>1. The above materials should be finalised, approved by the CBOP OLT and rolled out to all ministries.</p> <p>2. The information booklets should include the contact details of the Camp Executive Officer and/or ERMO Safeguarding Co-ordinator so that families/carers know who to contact should they have a safeguarding concern.</p>
Agreed Action	<p>1. ERMO will review the camp application and referral process to ensure it includes the provision of safeguarding information for children and families. This will include the roll-out of appropriate safeguarding materials for use in all camps.</p> <p>2. Camp feedback forms will be further addressed at the next Safeguarding Working Party meeting, with a view to implementing the new system after approval from the ERMO Executive Officer.</p>
Responsibility	ERMO Safeguarding Co-ordinator
Due date	31 July 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>The following points were noted:</p> <ol style="list-style-type: none"> 1. Whilst job advertisements and position descriptions have been updated to include safeguarding requirements, the existing Guideline on Selection and Recruitment of Personnel does not emphasise the commitment to child safeguarding or zero tolerance to child abuse and does not outline the overall approach to safeguarding as part of the recruitment process. 2. Whilst roles are risk assessed for the level of contact with children and the appropriate checks are conducted as required, this process is not formal and documentation around the assessment is not kept. 3. The standard referee questions do not contain questions on safeguarding. 	
Recommendation	<ol style="list-style-type: none"> 1. The Guideline on Selection and Recruitment of Personnel should be updated as noted above. 2. The Guideline on Selection and Recruitment of Personnel should also require that roles are formally assessed for the level of contact with children and that this assessment be documented and retained 	

Recommendation cont.	3. The standard referee questions should be updated to include appropriate questions on safeguarding, commensurate with the risk assessment conducted for the role as per point 2 above.
Agreed Action	Amendments to the recruitment documents and practices have been drafted and are awaiting approval. The task of rolling out these amendments will be assigned to the Director of Resources for implementation in recruitment practices going forward.
Responsibility	Province Deputy Leader
Due date	30 September 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 following points were noted:</p> <ol style="list-style-type: none"> 1. The Guideline on Selection and Recruitment of Personnel does not contain requirements or guidance on which personnel are required to have working with children checks and/or National Criminal History Checks (police checks). CBOP has recently instructed its Brothers, staff and volunteers to obtain working with children checks, although this is still being implemented for the Brothers as well as for general employees (with the exception of those employees/volunteers working in Edmund Rice Camps where there has always been a requirement to have a valid working with children check prior to working at the camp). 2. We note that many of the Brothers have working with children checks through their volunteer work or ministry with other organisations. No process has been developed to check the validity of the external working with children check and link this to the religious institute. 3. We note that CBOP has implemented a database to capture and record details of working with children checks for all personnel. Once this database is fully populated, there should be a formal process implemented for monitoring and review of working with children checks and police checks, including clear follow-up and/or disciplinary actions where the required checks are not undertaken. This should also include required actions where an individual's (working with children check) card has been suspended or has lapsed. 4. Whilst the requirement for staff and volunteers working at Edmund Rice Camps to have a valid working with children check is strictly enforced, we noted one deviation for Tasmania where volunteers were commencing work at the camps upon submitting their application receipt for the check, rather than when the card has actually been received. It is possible that these volunteers could start work in the camps and not subsequently pass the check. Whilst we acknowledge that the risk of this is low, given all volunteers go through a rigorous camp volunteer application process, including interview, referee checks and other background screening to determine their suitability of working with children, the risk still exists that an unsuitable person may commence working at the camp. 5. Candidates admitted to formation are not required to obtain working with children checks or, in jurisdictions where working with children checks are not available, local police checks or other background checks. 	

Recommendation	<p>We recommend the following:</p> <ol style="list-style-type: none"> 1. CBOP should formally document its approach and requirements around working with children checks and police checks for Brothers, employees and volunteers, in the Guideline on Selection and Recruitment of Personnel. This should include clear follow-up and/or disciplinary actions where the required checks are not undertaken and actions where an individual's working with children check has been suspended or has lapsed. In relation to general employees who do not work with children, the requirement for these roles to have a working with children check could be scaled back without increasing the safeguarding risk, however we recommend that as a matter of good practice, a National Criminal History (police) check be conducted for these employees every three years. 2. A process for linking existing working with children checks to the religious institute should be developed and implemented. 3. ERMO should provide clear instructions to all Edmund Rice Camps that staff or volunteers are not to commence work at camps unless they have the required working with children checks already in place. 4. CBOP should require that all candidates applying to enter formation obtain a working with children check (or equivalent background check) prior to commencing the first stage of formation.
Agreed Action	<ol style="list-style-type: none"> 1. CBOP will develop a guideline for personnel setting out its approach and requirements to working with children checks and police checks. 2. CBOP will develop a process for linking existing working with children checks to the Province. 3. ERMO has issued a mandatory instruction to all camps in line with the recommendation. 4. The requirement to obtain a working with children check when commencing formation will be included in the Formation Handbook and guidelines.
Responsibility	Chair of Safeguarding Committee
Due date	<ol style="list-style-type: none"> 1. 30 June 2020 2. 30 June 2020 3. Completed 4. 30 September 2020

Recommendation #8		Priority 2
Criterion 5.3 - Personnel receive an appropriate induction and are aware of child safeguarding responsibilities, including reporting obligations.		
Details of finding	<p>CBOP has various types of safeguarding training in place for personnel:</p> <ol style="list-style-type: none"> 1. Edmund Rice Camps have detailed child protection training which must be attended by all staff and volunteers before they can work in the camps. This requirement is strictly enforced. 2. Brothers from Victoria and Western Australia have attended safeguarding training conducted in 2019. This training will be rolled out to the other Brothers' communities in 2020. The Cluster Leader's Gathering will also be used to include training on Safeguarding Policy, Code of Conduct and introduction to the NCSS. 	

Details of finding cont.	<p>3. A “Staff Induction Formation Experience” commenced in 2019 for general employees in Victoria, which addresses requirements around child safety. This induction program will be rolled out to employees in other states in 2020. New employees will have to complete requirements on child and vulnerable adults safeguarding from the New Personnel Induction Checklist.</p> <p>We note that the training materials used for points 2 and point 3 above do not contain all of the required safeguarding elements as per Indicator 7.1.2.</p>
Recommendation	<ol style="list-style-type: none"> 1. A training framework should be developed to ensure safeguarding training is rolled out to all CBOP personnel. This should include capturing training attendance records as well as follow up actions where an individual does not attend the required training. In this regard, consideration should be given to the development of an automated system (e.g. database) to record and maintain training records. 2. The safeguarding training provided for Brothers as well as the staff induction training, should ensure that the following elements are covered, as per Indicator 7.1.2: <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, including potential online risks and the safe use of technology.
Agreed Action	<ol style="list-style-type: none"> 1. CBOP will develop a training schedule and implement this for all personnel in line with the recommendation. 2. CBOP will ensure that the training package is updated to include the six safeguarding elements as noted above.
Responsibility	ERMO Safeguarding Co-ordinator
Due date	<ol style="list-style-type: none"> 1. 31 December 2020 2. 30 June 2020

Recommendation #9		Priority 3
Criterion 5.4 - Ongoing supervision and people management is focused on child safeguarding.		
Details of finding	<ol style="list-style-type: none"> 1. Performance reviews for employees are generally not conducted or are informal, and do not include assessment of adherence to safeguarding requirements. 2. For volunteers at Edmund Rice camps, feedback is provided by team leaders after each camp to assess the performance of volunteers. However, these observations are generally not formally documented. 	
Recommendation	<ol style="list-style-type: none"> 1. Performance reviews for employees should be formalised and should include safeguarding requirements, commensurate to the employee’s role. 2. In relation to volunteers, we recommend that a brief (one page) performance review template be developed which can be used by leaders to review performance of volunteers, in particular with respect to safeguarding aspects. 	
Agreed Action	<ol style="list-style-type: none"> 1. The task of reviewing the performance review process for employees will be assigned to the Director of Resources for follow-up and action. 	

Agreed Action	2. A volunteer performance review process will be developed and implemented, as appropriate, for key volunteers within ERMO ministries.
Responsibility	1. Province Deputy Leader 2. ERMO Safeguarding Co-ordinator
Due date	1. 31 December 2020 2. 31 July 2020

Recommendation #10		Priority 2
Criterion 5.5 - Robust processes exist for screening candidates before and during seminary and religious formation. Robust processes are implemented 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. CBOP does not have a process in place to disclose to other Church Authorities where a candidate does not continue in the formation program. We acknowledge that it is not always possible for CBOP to know if a candidate who has left the formation program subsequently applies to join another Church Authority. However, where CBOP becomes aware of this, and if there was an issue around the candidate's ongoing suitability to be in ministry, either through some psychological or behavioural aspect which goes against the entity's Code of Conduct or which shows a disregard for compliance with policies or safeguarding practices, then this should be disclosed to the other Church Authority. If the candidate has left for general reasons, e.g. leaving for personal reasons or being called to a different model of ministry, etc, then this would not need to be disclosed. 2. There is no policy in place specifying professional/pastoral supervision requirements for personnel. We note that the Province Leadership Team undertakes regular supervision with an external qualified supervisor and group supervision is undertaken for those in both administrative and ministry leadership positions with a qualified Spiritual Director. In addition, the Province has sponsored three people to undertake professional supervision training – a Brother, and two employees – who will then be available to provide professional supervision to others as required. However, at the time of the audit, whilst most Brothers interviewed indicated they had regular contact with their Spiritual Director, there was no requirement for them to undertake professional/pastoral supervision as defined in the NCSS. 3. Performance appraisals for Brothers employed by the Province are currently not conducted. 	
Recommendation	<ol style="list-style-type: none"> 1. CBOP should establish a process to inform Church Authorities where a candidate does not continue in the formation program, in the circumstances as noted above. 2. We recommend CBOP develops a formal policy around professional/pastoral supervision (as distinct from spiritual direction) for all personnel who work with, or who manage/supervise others who are working with children. This should include providing support and assistance to those who are having difficulty in finding suitable Supervisors. 3. Brothers employed by the Province or volunteering in formal ministry for the Province should be subject to the same performance review processes as for employees. The performance review should include assessment of adherence to safeguarding policies and requirements (refer also recommendation #9). 	

Agreed Action	<ol style="list-style-type: none"> 1. The CBOP OLT has discussed this recommendation and does not see any <i>practical</i> way in which this can be implemented through an action <i>originating</i> from the congregation from which the candidate departed. The OLT's view that it is the responsibility of a <i>receiving congregation</i> to follow up on an applicant's history and to check references thoroughly and that it is the responsibility of the prior congregation when questioned to disclose any information that might be pertinent to the acceptance of the candidate by the other entity. CBOP is committed to answering truthfully any enquiries from another Church Authority about the suitability of a former candidate. 2. The Safeguarding Committee will review this recommendation with a view to developing a recommendation for the OLT to address this area. 3. This will be addressed as part of the actions for recommendation #9, point 1.
Responsibility	<ol style="list-style-type: none"> 1. No further action 2. Chair of Safeguarding Committee 3. Province Deputy Leader
Due date	<ol style="list-style-type: none"> 1. N/A 2. 31 July 2020 3. 31 December 2020

Recommendation #11		Priority 3
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.		
Details of finding	The current formation program does not include training on pastoral responses to victim/survivors of sexual abuse.	
Recommendation	We recommend the formation program be updated as noted above.	
Agreed Action	CBOP will make a representation to the African Formation Group (which administers the Formation program) to make this change.	
Responsibility	Director of Formation	
Due date	31 August 2020	



Standard 7: Ongoing education and training

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

Recommendation #12		Priority 2
Criterion 7.2 - Personnel receive training to recognise the nature and indicators of child abuse, including harmful behaviours by a child towards another child.		
Criterion 7.3 - Personnel receive training to enable them to respond effectively to child safeguarding risks, concerns, disclosures and allegations of child abuse.		
Criterion 7.4 - Personnel receive training and information on how to build culturally safe environments for children.		
Details of finding	<p>Our review of the training materials for ministry volunteers and other employees working with children indicates that the following topics are not formally covered:</p> <ul style="list-style-type: none"> • information on grooming and related behaviours; • identifying and responding to abusive behaviours by a child towards another child (e.g. bullying); • recognising and understanding the various forms that disclosures and allegations of abuse can take, including complaints raised by a child (refer also recommendation #12); • information on CBOP's record keeping guidelines (refer also recommendation #4); and • cultural safety (i.e. the creation of culturally safe environments for children). 	
Recommendation	The safeguarding training materials should be updated to address the items noted above.	
Agreed Action	The above components will be incorporated into training for staff and volunteers.	
Responsibility	ERMO Safeguarding Co-ordinator	
Due date	31 October 2020	



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 #13		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	<p>Processes to manage third party contractors engaged by CBOP are informal.</p> <p>There is no policy around safeguarding requirements that need to be acknowledged /adhered to, for either one-off or long-term, regular contractors.</p>	

Recommendation	<p>CBOP should develop a policy on the due diligence expected for third parties engaged by all sites and/or ministries. This should include the following:</p> <ol style="list-style-type: none"> 1. all contractors signing in or out of the facility/site and being appropriately supervised; 2. agreements with long-term or repeat contractors should contain appropriate references to safeguarding, including: <ul style="list-style-type: none"> • CBOP’s expectations on safeguarding and zero-tolerance approach to child abuse; and • the contractor providing surety to CBOP that they have policies and procedures in place in relation to safeguarding (including working with children’s checks where required), or where they don’t have their own policy, confirmation that they will adhere to CBOP’s safeguarding policies and procedures.
Agreed Action	CBOP will update the current guideline regarding the use of professional contractors as per the recommendation.
Responsibility	<ol style="list-style-type: none"> 1. Risk Consultant; and 2. Director of Province Resources
Due date	30 September 2020



Standard 9: Continuous improvement

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

Recommendation #14		Priority 2
Criterion 9.1 - The entity regularly reviews and improves child safeguarding practices.		
Details of finding	<p>CBOP has not yet developed a Safeguarding Implementation Plan. CBOP will be using the results of this audit to populate a Safeguarding Implementation Plan, including self-audit processes.</p> <p>In relation to monitoring of compliance with the NCSS, we note that the ERMO Safeguarding Co-ordinator has already begun a series of visits and interactions with the ministries to review their existing safeguarding practices and to plan for the implementation of the NCSS in these ministries.</p>	
Recommendation	<p>We recommend the following:</p> <ol style="list-style-type: none"> 1. A Safeguarding Implementation Plan, including self-audit processes, should be developed and actioned, with target dates identified and monitored. 2. The Safeguarding Implementation Plan should include a formal plan for the roll-out of NCSS requirements (where these are not yet in place) for all ministries and sites. 	
Agreed Action	CBOP will develop a Safeguarding Implementation Plan as per the recommendation.	
Responsibility	Chair of Safeguarding Committee	
Due date	30 September 2020	

Recommendation #15		Priority 2
Criterion 9.2 - The entity analyses concerns and complaints to identify causes and systemic failures to inform continuous improvement.		
Details of finding	The ERMO Safeguarding Co-ordinator currently documents any incidents arising in the ministries and prepares a monthly Safeguarding Report for the OLT and ERMO Board. However, there is no detailed analysis of this information to identify potential systemic issues or patterns.	
Recommendation	CBOP should develop a process to analyse incidents, concerns and complaints and use this information to refine, adapt, monitor and continuously improve their safeguarding processes.	
Agreed Action	A self-audit process will be developed to review individual complaints and outcomes. Relevant findings will be documented within the OLT reports. In addition, an annual review of a qualitative nature will be completed once a year and the findings reported in the Annual Safeguarding Report.	
Responsibility	ERMO Safeguarding Co-ordinator	
Due date	31 January 2021	

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

INTERVIEWS AND MINISTRIES VISITED AS PART OF THE AUDIT

Christian Brothers were interviewed across the regions of the Oceania Province, as follows:

New South Wales /Australian Capital Territory	5
New Zealand	2
Philippines	2
Papua New Guinea	2
Queensland/Northern Territory	7
South Australia	2
Victoria / Tasmania	10
Western Australia	5
	35

The following Christian Brothers Ministries were visited and/or interviewed, as part of this audit:

Edmund Rice Camps Victoria
Edmund Rice Camps New South Wales
Edmund Rice Camps Tasmania
Edmund Rice Centre for Justice and Community Education
Network of Callan Services for Persons with Disabilities National Unit (PNG)

Appendix D

GLOSSARY

The definitions of 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/cfca-resource-sheet/reporting-child-abuse-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

	<p>demonstrated by thinking that their contributions to the life of the Church are second-rate, or that in all things, surely 'Father knows best'.</p> <p>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.</p>
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	<p>means, in the formal setting of an institution, child abuse caused by factors such as:</p> <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	is a 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.