

**National Catholic  
Safeguarding Standards  
Augustinians of the  
Province of Australasia**

**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 breach 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 the Augustinians of the Province of Australasia (APA).

## 1.2 Background

The Order of St Augustine is a religious order of priests and brothers named after Saint Augustine and committed to his ideals of community and social justice. Established in 1256, the Augustinians now live and minister in over 40 countries, preaching the Gospel among people of many cultures, languages and traditions and seeking to foster St Augustine's ideal of uniting people in the communion of mind and heart.

Since the first Augustinian arrived on the Australian continent in 1838, the Order has been part of Australian history. One of the early priests was a chaplain to convicts at Port Arthur in Tasmania, two were associated with the Eureka Stockade, another supported St Mary Mother of the Cross MacKillop, while yet another attended the death of Ned Kelly and may have earlier been the one who baptised him. There are currently 31 priests in Australia located in the states of Queensland, New South Wales and Victoria, whose work involves:

- education - APA has governance over St Augustine's College in Brookvale NSW, and Villanova College in Coorparoo Qld;
- parish work - there are four parishes administered by the Order in Qld, NSW and Victoria; and
- Indigenous outreach – this is conducted through the “Augustinian Volunteers Australia” ministry which operates in NSW and Qld, and also through representation in Indigenous communities within the Diocese of Cairns.

APA also oversees and is responsible for ministries in South Korea and Vietnam. In addition, an Australian Augustinian administers in both Thailand and Myanmar, and an Australian Augustinian undertakes international administrative work in Rome.

APA 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 APA's compliance with the Category One Indicators is detailed in Section 2 of this report. Our recommendations for improvement, including APA'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 APA and the extent of its compliance with the requirements of the NCSS.

Our testing procedures included the following:

- interviews, observations and enquiry with the APA Leadership Team, APA Safeguarding Committee, individual APA members 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 APA.

Audit activities included a review of Australian and overseas ministries as well as interviews with 6 (25%) active APA members in relation to how safeguarding activities are applied in their daily work with other organisations. Safeguarding requirements were also reviewed for APA seminarians and those in the APA novitiate program.

With recent restrictions on travel and face-to-face meetings as a result of the coronavirus pandemic, CPSL has adapted its audit approach to continue with audits online. This audit was conducted remotely, with review of documents, assessment of policies and procedures and discussions and interviews with personnel conducted using email, video conferencing, photos, and other electronic communication methods. This included videoconference meetings with auditees in Australia, Korea, Vietnam and Thailand. All remote activities were conducted with specific precautions and security to ensure confidential information (where accessed) was either not stored, or was de-identified and protected in line with CPSL's Privacy Policy.

It should be noted that the activities of the two schools governed by APA, including their child safety practices, are subject to existing regulatory requirements and external accreditations. Under the CPSL audit framework, these entities are not re-audited by CPSL, although both entities were required to provide declarations to CPSL regarding the extent of regulation and audit processes that are in place.

As such, the findings, recommendations and management actions in this report pertain solely to the congregational ministries governed by APA which are not subject to assurance processes, and should not be construed as applying in any way to the activities of St Augustine's College or Villanova College.

## 1.4 Overall Audit Findings

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

Our assessment indicates that APA has fully implemented or has substantially progressed in the implementation of 104 (97%) of the 107<sup>2</sup> Indicators which are relevant to their operations.

Three Indicators (3%) are in the initial stages of implementation. These relate to:

- development of formal performance appraisals for employees and volunteers;
- development of a system for conducting performance appraisals for members; and
- development of procedures for monitoring of internet activity.

The key findings from the audit are summarised below.

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<sup>1</sup> Refer Appendix A for definitions of the maturity scale used for the Compliance Assessment.

<sup>2</sup> Of the 111 NCSS Indicators applicable to Category One, four of these are not relevant to APA's operations.

### **NCSS Standard 1 – Committed leadership, governance and culture**

APA has a dedicated Professional Standards Project Officer and Safeguarding Committee which is responsible for overseeing the implementation and monitoring of the NCSS.

There is a comprehensive suite of safeguarding policies which have been disseminated to members and employees, along with associated training, resources and support materials. These safeguarding policies are also uploaded to the Safeguarding section of APA's website.

APA has conducted a significant amount of work in the area of risk management and has developed detailed risk assessments for all of its members' activities, premises, events and overseas ministries. This work has been translated into an overall congregational risk register which shows at a glance, the ministries and activities which have higher safeguarding risks and which need additional supervision and monitoring. APA is now developing a formal process for the safeguarding committee and leadership team to regularly review and update the congregational risk register.

Our discussions with personnel in the overseas ministries have indicated a strong awareness of safeguarding practices and APA has now developed a comprehensive implementation plan for the roll-out of the NCSS in the overseas ministries, using a structured, staged approach. This should include the translation of key documents or procedures into the local languages, as required.

### **NCSS Standard 2 – Children are safe, informed and participate**

#### **NCSS Standard 3 – Partnering with families, carers and communities**

The majority of Augustinian members work or minister through other organisations and as such, there is little opportunity for APA to engage directly as a congregation with children and families in relation to their congregational safeguarding practices.

However, all Augustinian members we interviewed were aware of the need to engage with children and families on matters of safeguarding, as part of their day-to-day ministries, in conjunction with their existing duties.

Now that the Augustinian safeguarding policies have been finalised and the CPSL audit has been completed, APA should consider displaying a copy of their safeguarding policies and providing access to the audit report in each of the parishes/schools that they are associated with, together with active encouragement of feedback from the local community.

### **NCSS Standard 4 – Equity is promoted and diversity is respected**

APA has a strong focus on equity and diversity and the promotion of cultural safety through its work in Indigenous communities, as well as its ministry work overseas.

Members, employees and volunteers are provided access to information on cultural safety and this topic is acknowledged as central to the ministry work of Augustinian Volunteers Australia.

### **NCSS Standard 5 – Robust human resource management**

APA has a recruitment policy which clearly outlines safeguarding requirements in all aspects of its advertising, vetting and screening of personnel. APA is yet to update the position descriptions of existing employees for relevant safeguarding clauses.

APA is also yet to develop a formal performance appraisal process which will incorporate safeguarding requirements for all personnel.

### **NCSS Standard 6 – Effective complaints management**

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

APA has a comprehensive complaints management policy and has also established an online whistleblower service (Stoptline) for use by members, employees, volunteers and other members of the public to report suspected abuse, misconduct or policy breaches in an anonymous manner.

APA has an established professional standards committee whose role is to review actual or potential incidents or complaints and to work with the Catholic Professional Standards Offices (PSOs) in each State with respect to the management of investigations as required.

Our audit procedures have indicated that complaints handling processes are robust and operating continuously.

#### **NCSS Standard 7 – Ongoing education and training**

Interviews with APA members indicated a strong understanding of the congregational safeguarding policies, including knowledge of the appropriate response should a concern be raised.

APA has developed a formal training manual which has been rolled out to APA members and employees. The manual is yet to be rolled out to Augustinian Volunteers Australia, as this ministry has been in abeyance during the coronavirus pandemic.

Whilst the training manual is comprehensive, it needs to be updated to include information on grooming and related behaviours, as well as document retention requirements.

#### **NCSS Standard 8 – Safe physical and online environments**

APA has a Safe Use of Information and Communication Technology Policy which details its expectations regarding use of technology, including acceptable online conduct and expectations around social media.

APA has yet to develop a program of formal monitoring of internet activity.

#### **NCSS Standard 9 – Continuous improvement**

#### **NCSS Standard 10 – Policies and procedures support child safety**

APA has developed a Safeguarding Implementation Plan which will be updated to include the actions arising from the CPSL audit, including processes for ongoing monitoring of compliance with the NCSS.

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

National Catholic Safeguarding Standard	# NCSS Indicators (Category One)	Not Relevant to APA (NR)	Assessment of Compliance			
			Managed & measurable (M)	Defined & developed (D)	Initial / Ad hoc (I)	Not addressed (N)
1: Committed leadership, governance & culture	16	1	13	2	-	-
2: Children are safe, informed and participate	5	-	4	1	-	-
3: Partnering with families, carers & communities	6	-	6	-	-	-
4: Equity is promoted and diversity is respected	4	-	4	-	-	-
5: Robust human resource management	23	-	19	2	2	-
6: Effective complaints management	24	-	23	1	-	-
7: Ongoing training & education	9	-	5	4	-	-
8: Safe physical and online environments	10	1	8	-	1	-
9: Continuous improvement	8	2	6	-	-	-
10: Policies and procedures support child safety	6	-	6	-	-	-
<b>TOTAL</b>	<b>111</b>	<b>4</b>	<b>94</b>	<b>10</b>	<b>3</b>	<b>-</b>
			104 (97%)		3 (3%)	

Audit recommendations are classified according to priority and urgency for remediation.<sup>3</sup>

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

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

We would like to thank the APA leadership team, the Safeguarding Committee and all personnel who were involved in the audit for their cooperation and assistance.

<sup>3</sup> 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.	✓			
<b>Observations:</b> Requirements of the Indicator are in place. No recommendations for improvement noted.					
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"> <li>• promoting child safeguarding regularly;</li> <li>• emphasising that child-safeguarding is everyone's responsibility; and</li> <li>• actively monitoring safeguarding compliance and risk management.</li> </ul>	✓			
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.	✓			
<b>Observations:</b> Requirements of the Indicator 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.		✓		
<b>Observations:</b> 1.3.2 Consideration should be given to the development of culturally appropriate complaints handling materials, including the translation of the commitment statement for the overseas ministries. Refer <a href="#">recommendation #1</a> .					

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.	✓			
<b>Observations:</b>					
Requirements of the Indicator are in place. No recommendations for improvement noted.					
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.		✓		
<b>Observations:</b>					
1.5.3 An overall risk register has been prepared at the congregational level - a process needs to be developed to review the risk register regularly with the safeguarding committee/leadership team. Refer <a href="#">recommendation #2</a> .					
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.	✓			
<b>Observations:</b>					
Requirements of the Indicator are in place. No recommendations for improvement noted.					

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.	✓			
<b>Observations:</b> Requirements of the Indicator are in place. No recommendations for improvement noted.					
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.	✓			
<b>Observations:</b> 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.	✓			
<b>Observations:</b> 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.		✓		
<b>Observations:</b> Training provided to volunteers does not include information on grooming and related behaviours. Refer <a href="#">recommendation #7</a> .					

Standard 3		Partnering with families, carers and communities			
<i>Families, carers and communities are informed and involved in promoting child safeguarding</i>					
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.	✓			
<b>Observations:</b> Requirements of the Indicator are in place. No recommendations for improvement noted.					
Criterion 3.2 - The entity engages and openly communicates with families, carers and communities about its child safeguarding approach, and relevant information is accessible.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.2.1	The entity promotes open dialogue and provides a range of ways for families, carers and communities to contribute to discussions about its child safeguarding approach.	✓			
3.2.2	The entity provides families, carers and communities with relevant safeguarding information including contact details of the Safeguarding Committee and/or Safeguarding Co-ordinator(s).	✓			
<b>Observations:</b> Requirements of the Indicator are in place. No recommendations for improvement noted.					
Criterion 3.3 - Families, carers and communities have a say in the entity's policies and practices.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.3.1	Processes are in place to engage families, carers and communities about their views on policies and practices for keeping children safe.	✓			
<b>Observations:</b> Requirements of the Indicator are in place. No recommendations for improvement noted.					
Criterion 3.4 - Families, carers and communities are informed about the entity's operations and governance.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
3.4.1	The entity ensures families, carers and communities are aware of the roles and responsibilities of personnel providing ministries or activities directly to their children.	✓			
<b>Observations:</b> 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.	✓			
<b>Observations:</b> Requirements of the Indicator are in place. No recommendations for improvement noted.					

Standard 4		Equity is promoted and diversity is respected			
<i>Equity is upheld and diverse needs respected in policy and practice</i>					
Criterion 4.1 - The entity actively anticipates children's diverse circumstances and backgrounds, and provides support and responds effectively to those who are vulnerable.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
4.1.1	The entity's Child Safeguarding Policy and practices reflect an understanding, and identification, of diverse circumstances and experiences that increase a child's vulnerability to abuse.	✓			
4.1.2	The entity's Complaints Handling Policy and practices demonstrate an understanding of barriers that prevent children from disclosing abuse and barriers for adults recognising and/or responding to disclosures, and articulates processes that reduce barriers to disclosure.	✓			
<b>Observations:</b> 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.	✓			
<b>Observations:</b> Requirements of the Indicator are in place. No recommendations for improvement noted.					
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.	✓			
<b>Observations:</b> Requirements of the Indicator are in place. No recommendations for improvement noted.					

Standard 5		Robust human resource management			
<i>People working with children are suitable and supported to reflect child safeguarding values in practice</i>					
Criterion 5.1 - Recruitment, including advertising, interview questions, referee checks and personnel pre-employment screening, emphasises child safeguarding.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.1.1	The entity emphasises its commitment to child safeguarding and zero-tolerance approach to child abuse in all aspects of its advertising, screening and recruitment for personnel.	✓			
5.1.2	The entity documents its safeguarding approach in recruitment and screening procedures and processes.	✓			
5.1.3	Positions are assessed for the expected level of contact with children and appropriate child safeguarding recruitment procedures are implemented.	✓			
5.1.4	Position descriptions, selection criteria, referee checks and interview questions articulate: <ul style="list-style-type: none"> <li>that children are valued and respected;</li> <li>the commitment of the entity to child safeguarding; and</li> <li>where appropriate to the role, an understanding of children's developmental needs and culturally safe practices.</li> </ul>		✓		
<b>Observations:</b>					
5.1.4 Position descriptions for employees have not yet been updated for safeguarding clauses. Refer <a href="#">recommendation #3</a> .					
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"> <li>personnel have a current working with children check as required by legislation, prior to working with children; and</li> <li>where a working with children check is not required by legislation, other background checks for personnel are conducted prior to working with children.</li> </ul>	✓			
5.2.2	The entity keeps records and monitors the status of working with children checks and/or background checks for all personnel.		✓		
<b>Observations:</b>					
5.2.2 Not all working with children checks for personnel have been linked to the congregation. In addition, police checks are still being implemented for personnel in leadership positions and/or those who represent the entity. Refer <a href="#">recommendation #4</a> .					
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.	✓			
<b>Observations:</b>					
Requirements of the Indicator are in place. No recommendations for improvement noted.					

Criterion 5.4 - Ongoing supervision and people management is focused on child safeguarding		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
5.4.1	Support, mentoring, oversight and professional supervision processes for personnel include child safeguarding.	✓			
5.4.2	Annual performance reviews for personnel include child safeguarding responsibilities relevant to their role.			✓	
<b>Observations:</b>					
5.4.2 Formal performance appraisals are not yet in place for employees and volunteers. Refer <a href="#">recommendation #5</a> .					
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.	✓			
<b>Observations:</b>					
5.5.4 A system for conducting performance appraisals for members has not yet been developed. Refer <a href="#">recommendation #5</a> .					
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.	✓			
<b>Observations:</b>					
Requirements of the Indicator are in place. No recommendations for improvement noted.					

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.	✓			
<b>Observations:</b> 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.	✓			
5.8.2	All overseas clergy and religious participate in a Safeguarding Induction program, documented by the entity, before work with children begins.	✓			
5.8.3	Overseas clergy and religious are supported with a suitable mentor for at least the first two years of their time in Australia.	✓			
5.8.4	The entity promotes as normative the participation of all overseas clergy and religious in active ministry in no less than six hours of professional/pastoral supervision per year.	✓			
<b>Observations:</b> Requirements of the Indicator are in place. No recommendations for improvement noted.					



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 Complaints 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.		✓		
<b>Observations:</b>					
6.1.7 The complaints handling policy includes guidance on taking and recording complaints. This should be supported by a standard template to capture incidents/complaints for use in the volunteer ministry and the overseas ministries. Refer <a href="#">recommendation #6</a> .					
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.	✓			
<b>Observations:</b>					
Requirements of the Indicator are in place. No recommendations for improvement noted.					

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.	✓			
<b>Observations:</b> Requirements of the Indicator 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"> <li>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</li> <li>personnel cooperate with law enforcement procedures and directives.</li> </ul>	✓			
<b>Observations:</b> 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.	✓			
<b>Observations:</b> 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.	✓			
<b>Observations:</b> 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.	✓			
<b>Observations:</b> 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, as a minimum 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"> <li>• Code of Conduct;</li> <li>• safeguarding risk management;</li> <li>• Child Safeguarding Policy and procedures;</li> <li>• Complaints Handling Policy and procedures;</li> <li>• reporting obligations; and</li> <li>• e-safety training.</li> </ul>		✓		
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.	✓			
<b>Observations:</b>					
7.1.2 Volunteers are required to attend safeguarding training before commencing ministry, however to date, this training has been based on the safeguarding policy of the Diocese of Parramatta, rather than on the Augustinian policies. Refer <a href="#">recommendation #7</a> .					
7.1.3 Records of attendance at training by volunteers have not been kept. Refer <a href="#">recommendation #7</a> .					
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"> <li>• understand the nature and impact of child abuse;</li> <li>• understand the nature, factors and impact of institutional abuse;</li> <li>• identify risk factors, such as grooming behaviours; and</li> <li>• understand, identify and respond to abusive behaviours by a child towards another child.</li> </ul>		✓		
<b>Observations:</b>					
Training provided to volunteers does not include information on grooming and related behaviours. Refer <a href="#">recommendation #7</a> .					

Criterion 7.3 - Personnel receive training to enable them to respond effectively to child safeguarding risks, concerns, disclosures and allegations of child abuse.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
7.3.1	The entity provides training to equip relevant personnel to appropriately respond to and support those bringing forward concerns, disclosures and allegations of child abuse.	✓			
7.3.2	The entity provides training to ensure personnel are aware of information sharing and record keeping policies and procedures.		✓		
7.3.3	The entity provides training to ensure personnel are aware of their reporting obligations under state/territory legislative requirements including: <ul style="list-style-type: none"> <li>• reporting criminal behaviour to police;</li> <li>• mandatory reporting to child protection authorities;</li> <li>• Reportable Conduct Scheme; and</li> <li>• reporting to regulatory authorities/government departments.</li> </ul>	✓			
<b>Observations:</b>					
7.3.2 The safeguarding training does not include the requirement to maintain safeguarding records for a minimum of 50 years. Refer <a href="#">recommendation #7</a> .					
Criterion 7.4 - Personnel receive training and information on how to build culturally safe environments for children.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
7.4.1	The entity provides cultural safety training to equip relevant personnel to create culturally safe environments for Aboriginal and Torres Strait Islander children and children from culturally and linguistically diverse backgrounds.	✓			
<b>Observations:</b>					
Requirements of the indicator are in place. No recommendations for improvement noted.					

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, the sacrament of reconciliation, coaching, spiritual direction and mentoring.	✓			
<b>Observations:</b> Requirements of the indicator 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.			✓	
<b>Observations:</b> 8.2.2 Filtering/blocking of internet sites is in place, however a program of formal monitoring of internet activity has not yet been developed. Refer <a href="#">recommendation #8</a> .					
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			
<b>Observations:</b> Requirements of the indicator 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.	✓			
<b>Observations:</b> Requirements of the indicator are in place. No recommendations for improvement noted.					

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.	✓			
<b>Observations:</b> Requirements of the Indicators are in place. No recommendations for improvement noted.					
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.	✓			
<b>Observations:</b> Requirements of the Indicators are in place. No recommendations for improvement noted.					
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			
<b>Observations:</b> 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.	✓			
<b>Observations:</b> Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 10.2 - Policies and procedures are accessible and easy to understand.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.2.1	The entity's policies and procedures relevant to safeguarding are readily available and accessible to personnel.	✓			
<b>Observations:</b> 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.	✓			
<b>Observations:</b> Requirements of the Indicators are in place. No recommendations for improvement noted.					
Criterion 10.4 - The Church Authority and leaders champion and model compliance with policies and procedures.		Managed & Measurable	Defined & Developed	Initial/ Ad-Hoc	Not Addressed
10.4.1	The Church Authority and leaders promote and enact all policies and procedures relevant to safeguarding.	✓			
<b>Observations:</b> 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.	✓			
<b>Observations:</b> 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 1.3 - Governance arrangements facilitate implementation of a Child Safeguarding Policy across the entity's activities		
<b>Details of finding</b>	<p>APA has overseas ministries in Korea, Vietnam and Thailand. Our interviews with personnel in these ministries indicate that there is a strong understanding of safeguarding practices and the Province has developed an implementation plan to roll out the NCSS in a staged approach in these overseas ministries.</p> <p>We note that the majority of information is currently in English and could benefit from translation into the local languages.</p>	
<b>Recommendation</b>	<p>Consideration should be given to translating key safeguarding documents, particularly those relating to complaints handling processes, into the local language to facilitate the roll-out of the NCSS in the overseas ministries.</p>	
<b>Agreed Action</b>	<p>This will be considered and actioned as appropriate as part of the implementation plan for the overseas ministries.</p>	
<b>Responsibility</b>	<p>Professional Standards Project Officer</p>	
<b>Due date</b>	<p>30 September 2021</p>	

Recommendation #2		Priority 2
Criterion 1.5 The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children		
<b>Details of finding</b>	<p>APA has a risk management policy in place and has completed risk assessments for their members' activities, premises and ministries. This work has been used to formulate an overall risk register at the congregational level which highlights the key safeguarding risks to the organisation.</p> <p>A process is yet to be developed for the regular review and update of the congregational risk register.</p>	
<b>Recommendation</b>	<p>A process be developed to monitor and updated the congregational risk register (at least six monthly) for discussion and review by the safeguarding committee/leadership team.</p> <p>This review process should be documented (e.g. minuted as part of the safeguarding committee/leadership team meetings).</p>	
<b>Agreed Action</b>	<p>A process will be established for regular review of the risk register as per the recommendation.</p>	
<b>Responsibility</b>	<p>Professional Standards Project Officer</p>	
<b>Due date</b>	<p>31 March 2021</p>	



## Standard 5: Robust human resource management

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

<b>Recommendation #3</b>		<b>Priority 2</b>
<b>Criterion 5.1 – Recruitment, including advertising, interview questions, referee checks and personnel pre-employment screening, emphasises child safeguarding.</b>		
<b>Details of finding</b>	APA has recently updated its Recruitment Policy to emphasise the congregation’s commitment to child safety and to document safeguarding requirements in the recruitment process. The recruitment of future employees and volunteers will follow the updated policy. However, we note that not all position descriptions for existing employees have been updated for the required safeguarding clauses.	
<b>Recommendation</b>	Position descriptions for existing employees should be updated to include a requirement to comply with the safeguarding policies of the congregation.	
<b>Agreed Action</b>	Updating of existing position descriptions for employees is in progress.	
<b>Responsibility</b>	Professional Standards Project Officer	
<b>Due date</b>	30 April 2021	

<b>Recommendation #4</b>		<b>Priority 2</b>
<b>Criterion 5.2 - Relevant personnel (including all seminarians, clergy and religious) have current working with children checks or equivalent background checks.</b>		
<b>Details of finding</b>	The following points were noted: <ol style="list-style-type: none"> <li>1. Some working with children checks have been obtained through other organisations and have not been linked with the congregation.</li> <li>2. Police checks are still being implemented for relevant personnel.</li> </ol>	
<b>Recommendation</b>	<ol style="list-style-type: none"> <li>1. All existing working with children checks for personnel should be linked to the congregation.</li> <li>2. As a matter of good practice, all personnel in leadership positions, including those with access to keys, monetary funds or other assets and those who represent the entity in a formal capacity, should undergo a National Criminal History (police) check.</li> <li>3. National Criminal History (police) checks should be undertaken regularly, at least every three years.</li> </ol>	
<b>Agreed Action</b>	We are in the process of implementing the actions as noted above.	
<b>Responsibility</b>	Professional Standards Project Officer	
<b>Due date</b>	31 March 2021	

<b>Recommendation #5</b>		<b>Priority 3</b>
<b>Criterion 5.4 - Ongoing supervision and people management is focused on child safeguarding</b>		
<b>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</b>		
<b>Details of finding</b>	<ol style="list-style-type: none"> <li>1. Performance reviews for employees are generally not conducted or are informal, and do not include assessment of adherence to safeguarding requirements.</li> <li>2. For volunteers, feedback is provided by the community where the volunteers are working, however these observations are generally not formally documented.</li> <li>3. A system for conducting performance appraisals for Augustinian members has not yet been developed.</li> </ol>	
<b>Recommendation</b>	<ol style="list-style-type: none"> <li>1. Performance reviews for employees should be formalised and should include safeguarding requirements, commensurate with the employee's role.</li> <li>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 requirements.</li> <li>3. We acknowledge that for those Augustinians who are engaged in a professional capacity by other organisations, the responsibility of conducting a formal performance appraisal relevant to their duties rests with the engaging organisation. We recommend that this be confirmed with those individuals and that feedback from this process is included in the annual check-in/review processes for members.</li> </ol>	
<b>Agreed Action</b>	We are in the process of investigating the best methods to address and implement the above recommendations. We expect this will be a staged approach as we gather more information on available systems and what is in use by other similar organisations to satisfy this area.	
<b>Responsibility</b>	Professional Standards Project Officer	
<b>Due date</b>	30 September 2021	



## Standard 6: Effective complaints management

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

Recommendation #6		Priority 2
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		
<b>Details of finding</b>	APA has a documented Complaints Management Policy which sets out the procedures to follow in responding to complaints. This should be supported by a standard template to record any potential incidents or complaints, so that this information is captured and documented in a consistent manner.	
<b>Recommendation</b>	A standard template should be developed to capture incidents and/or complaints and rolled out, together with the appropriate training/instructions, to all ministries.	
<b>Agreed Action</b>	We will develop a standard template as per the recommendation and ensure instructions on completing the template are included in the training manual and rolled out to all ministries.	
<b>Responsibility</b>	Professional Standards Project Officer	
<b>Due date</b>	31 March 2021	



## Standard 7: Ongoing education and training

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

<b>Recommendation #7</b>		<b>Priority 2</b>
<b>Criterion 7.1 - Personnel are trained and supported to effectively implement the entity's child safeguarding policies and procedures</b>		
<b>Criterion 7.2 - Personnel receive training to recognise the nature and indicators of child abuse, including harmful behaviours by a child towards another child.</b>		
<b>Criterion 7.3 - Personnel receive training to enable them to respond effectively to child safeguarding risks, concerns, disclosures and allegations of child abuse</b>		
<b>Details of finding</b>	<p>APA has recently finalised their suite of safeguarding policies and has incorporated these into a comprehensive safeguarding training manual which has been rolled out to Augustinian members and employees. The following points were noted:</p> <ol style="list-style-type: none"> <li>1. The safeguarding training manual does not include the requirement to maintain safeguarding records (including all incidents/complaints, working with children checks, background checks etc.) for a minimum of 50 years.</li> <li>2. The safeguarding training manual does not include information on grooming and related behaviours.</li> <li>3. In relation to the volunteer ministry, we note that the safeguarding manual has not yet been rolled out to this ministry. Whilst volunteers are required to attend safeguarding training before commencing ministry, to date these discussions have been based on the safeguarding policy of the Diocese of Parramatta, rather than on the Augustinian policies. In addition, records have not been kept of who has attended the volunteers' training.</li> </ol>	
<b>Recommendation</b>	<ol style="list-style-type: none"> <li>1. The training manual should be updated to include the requirement to maintain safeguarding records for a minimum of 50 years.</li> <li>2. The training manual should be updated to include information on grooming and related behaviours.</li> <li>3. We acknowledge that because of the restrictions on ministry due to the coronavirus pandemic, the volunteer ministry has not been operating continuously throughout the 2020 year. However, the training manual should be adapted and rolled out for the volunteer ministry once it is again operational.</li> <li>4. Records of attendance should be kept for all volunteers who attend the training.</li> </ol>	
<b>Agreed Action</b>	<p>Items 1 and 2 - this training manual will be updated as per the recommendations.</p> <p>Items 3 and 4 - we will work with the leader of the volunteer ministry to adapt the training manual and roll this out to all volunteers. This will include the requirement to maintain records of who has attended training, including follow-up procedures where individuals have not attended.</p>	
<b>Responsibility</b>	Professional Standards Project Officer	
<b>Due date</b>	30 April 2021	



## 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 #8		Priority 3
Criterion 8.2 - The online environment is used in accordance with the entity's Code of Conduct, safeguarding policies and procedures		
<b>Details of finding</b>	<p>APA has an existing Safe Use of Information and Communication Technology Policy which provides guidelines on expected behaviours in the online environment and how breaches would be handled.</p> <p>However, APA does not have a process for ongoing monitoring of computers/devices for appropriate use of web browsing and internet applications.</p>	
<b>Recommendation</b>	<p>APA should develop a process to monitor use of the online environment.</p> <p>This could take the form of an annual check by the party/firm that provides IT services or alternatively, APA could seek assistance from other partners who would likely have contacts/services in this field.</p>	
<b>Agreed Action</b>	<p>We are in the process of investigating the best methods to address and implement the above recommendations. We expect this will be a staged approach as we gather more information on available systems and what is in use by other similar organisations to satisfy this area.</p>	
<b>Responsibility</b>	<p>Professional Standards Project Officer</p>	
<b>Due date</b>	<p>30 September 2021</p>	

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



## Appendix B

### AUDIT FINDING PRIORITIES

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

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

## Appendix C

### GLOSSARY

The definitions 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.

<b>Accessible language</b>	means information is provided in multiple formats for individuals with different levels of English literacy and proficiency, modes of communication, languages and cognitive abilities.
<b>Allegation</b>	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”.
<b>Australian Catholic Bishops Conference</b>	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.
<b>Bishop</b>	means a diocesan bishop and archbishop and the ordinary of an ordinariate in the Latin Church and an eparch in the Eastern Churches.
<b>Canon law</b>	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.
<b>Canonical Steward</b>	means the person(s) or other entity canonically responsible for the Catholic Entity.
<b>Catholic Religious Australia</b>	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.
<b>Child/ren</b>	means individuals under 18 years of age.
<b>Child abuse</b>	<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: <a href="https://aifs.gov.au/cfca/publications/cfca-resource-sheet/reporting-child-abuse-and-neglect">https://aifs.gov.au/cfca/publications/cfca-resource-sheet/reporting-child-abuse-and-neglect</a></p> <p>Child abuse, when referenced throughout the National Catholic Safeguarding Standards, includes:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> </ul>

	<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> <li>• 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.</li> </ul>
<b>Child Safeguarding Commitment Statement</b>	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.
<b>Child safeguarding policies and procedures</b>	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"> <li>• recruitment;</li> <li>• risk management;</li> <li>• complaints handling; and</li> <li>• acceptable use (information and communication technology).</li> </ul>
<b>Church Authority</b>	means: <ol style="list-style-type: none"> <li>A. the diocesan bishop (or archbishop, as appropriate) of a diocese or his administrator from time to time;</li> <li>B. the Australian major superior in respect of religious institutes; or</li> <li>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.</li> </ol>
<b>Civic engagement</b>	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.
<b>Clergy</b>	means the body of those ordained in sacred ministry in the Church. They are either deacons, priests or bishops.
<b>Cleric</b>	means a member of the clergy.
<b>Clericalist/ism</b>	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>
<b>Complainant</b>	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.
<b>Conflicts of interest</b>	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.
<b>Cultural safety</b>	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.
<b>Dicastery</b>	means departments of the Roman Curia, including the Secretariat of State, congregations, tribunals, councils and offices.
<b>Diocese</b>	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.
<b>Entity</b>	means an entity that has been identified as Catholic by a competent authority within the Catholic Church.
<b>Eparchy</b>	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).
<b>Exposure to family violence</b>	refer to 'child abuse'.
<b>Formation/formation program</b>	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.
<b>Grooming/grooming behaviour</b>	refer to 'child abuse'.
<b>Institutional abuse</b>	<p>means, in the formal setting of an institution, child abuse caused by factors such as:</p> <ul style="list-style-type: none"> <li>• a "closed" culture within an organisation where transparency is discouraged;</li> <li>• failure to properly check the backgrounds and interview staff;</li> <li>• inadequate training of staff;</li> <li>• lack of child protection policies;</li> <li>• lack of support of staff by management;</li> <li>• poor communication skills; and/or</li> <li>• poor supervision of staff and children.</li> </ul>
<b>Lay/lay person</b>	means members of the Catholic Church other than bishops, priests, deacons and religious.
<b>Leaders</b>	means personnel who are responsible for important governance decisions within a Church entity and/or who lead and coordinate Church improvement initiatives.

<b>Leaders of Religious Institutes</b>	means the person acting in that canonical role (by whatever name) from time to time.
<b>Mentor</b>	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.
<b>Ministerial PJP</b>	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].
<b>Ministry</b>	means any activity within, or delivered by, an entity that is designed to carry out the good works of the Catholic Church.
<b>Neglect</b>	refer to ‘child abuse’.
<b>Offender</b>	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.
<b>Ordinariate</b>	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.
<b>Overseas clergy and religious</b>	means any cleric or member of a religious institute who is specifically recruited from overseas by a Church Authority or entity.
<b>Personal prelatore</b>	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.
<b>Personnel</b>	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.
<b>Physical abuse</b>	refer to ‘child abuse’.
<b>Position description</b>	means a document which details the role, responsibilities and expectations of a role within an entity and outlines reporting lines.
<b>Professional/pastoral supervision</b>	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.

<b>Protective behaviours program</b>	means an age-appropriate structured education program to equip children and young people with the skills and knowledge to enhance their personal safety.
<b>Psychological abuse</b>	refer to 'child abuse'.
<b>Religious Institute</b>	means an institute of consecrated life, a secular institute or society of apostolic life, and their provinces or equivalent.
<b>Respondent</b>	means a person against whom a complaint is made.
<b>Safeguarding</b>	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.
<b>Safeguarding Committee</b>	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.
<b>Safeguarding Co-ordinator</b>	means an individual who champions safeguarding and co-ordinates the implementation of the National Catholic Safeguarding Standards within an entity.
<b>Safeguarding Implementation Plan</b>	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.
<b>Seminary</b>	means a centre for the formation and education of students preparing for ordination.
<b>Sexual abuse</b>	refer to 'child abuse'.
<b>Spiritual abuse</b>	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.
<b>Substantiated complaint</b>	means allegations proven to be true or supported with evidence.
<b>Third parties</b>	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.
<b>Working with children check</b>	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.