The Carmelites
Australia and Timor-Leste
community • prayer • action

Carmelite Fathers
Safeguarding Audit Report
May 2022

National Catholic
Safeguarding Standards

Report prepared by:

ACSL
AUSTRALIAN CATHOLIC SAFEGUARDING LTD

A safe Church for everyone

Australian Catholic Safeguarding 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.

Australian Catholic Safeguarding Ltd is committed to fostering a culture of safety and care for children, and adults at risk.

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1. Executive Summary

1.1 Context

Australian Catholic Safeguarding Ltd (ACSL) was established in 2020, to bring together the work of Catholic Professional Standards Ltd (CPSL), the Australian Catholic Centre for Professional Standards (ACCPS) and the Australian Catholic Ministry Register (ACMR). ASCL is a company limited by guarantee, owned by the Australian Catholic Bishops Conference, Catholic Religious Australia, and the Association of Ministerial Public Juridic Persons.

ACSL is committed to fostering a nationally consistent culture of safety and care throughout the Catholic Church in Australia. This includes providing a range of services to support the implementation of the National Catholic Safeguarding Standards (NCSS), a framework for the protection and care of adults at risk and children. ACSL maintains the NCSS, undertakes audits and reviews of Church entities, and publishes reports which demonstrate a Church entity's commitment to the NCSS.

ACSL's core values are courage, compassion, and honesty. These values guide the way we work and inform cultural change within the Catholic Church and the wider community. We take our duty to care for and protect all children and adults at risk seriously and have zero tolerance for abuse of any kind.

This audit report includes the results of the NCSS compliance assessment for The Carmelites Australia and Timor-Leste, also known as The Carmelite Fathers.

1.2 Background

The Carmelites Fathers have a tradition spanning eight centuries originating in the 1190's in the Holy Land with the first Carmelites arriving in Australia in 1802. Since arriving in Australia the Carmelites Fathers have been actively involved with Australian communities through parish ministry, schools, spirituality and retreat centres, with a library offering pastoral and spiritual companionship to people. In Australia the Carmelites work in a variety of areas serving communities and offering their prayer and companionship. The ministries involve

- Running a Catholic College for boys.
- Administering three parishes (one in Victoria, one in New South Wales and one in Queensland).
- Supporting lay men and women to live a reflective life.
- Providing pastoral support to those suffering in our communities.
- Working as chaplains in hospitals and schools to support people at their most vulnerable.
- Providing a theological resource in The Carmelite Library for academics and those seeking a deeper meaning in life.
- Offering courses through The Carmelite Centre which supports people in their life journey.
- Running a Spirituality and retreat centre for spiritual healing which offer a place for reflection and pastoral care.
- Offering a reflective place at The National Shrine of Our Lady of Mount Carmel where people can share together through companionship and prayer.

In 2001, the Carmelites began supporting the people of Timor-Leste, both spiritually and through assisting in the reconstruction of their communities. Through the friendships that have been established, the Carmelite Fathers aim to empower the Timorese people to rebuild their own communities and help them recover from the hurt of their painful past. Timor-Leste is the poorest country in the Asia Pacific region and a very close neighbour to Australia. The Timorese people have lived through traumatic experiences and the Carmelite Fathers support is needed to assist them on the journey from despair to living richer fuller lives. The Carmelites Fathers mission in Timor-Leste is to:

- Educate young men to become Carmelites and work within their communities.
- Educate students, through offering scholarships and traineeships.
- Train young people in skills to gain employment in industries.
- Refurbish essential buildings e.g., schools, youth centres.
- Provide training and equipment to assist in agricultural programs.
- Provide safe drinking water.
- Offer Sacramental Programs for communities.
- Provide pastoral and spiritual companionship for life's journey.

The Carmelite Fathers Incorporated (VIC) has been assessed as a "Category Two" Church entity for application of the NCSS (Working with Children). There are 7 NCSS Standards, 33 NCSS Criteria and 84 NCSS Indicators that apply to Category Two entities. ACSL also agreed to audit compliance on the Carmelite Father's ministries in Timor-Leste. For further details of the category system and the Indicators which are applicable, refer to the NCSS documentation available on the Assessment and Accreditation page of the ACSL website.

ACSL assessment of The Carmelite Fathers' compliance with the relevant Indicators is detailed in Section 2 of this report. Our recommendations for improvement, including The Carmelite Australia Timor-Leste management responses, are included in Section 3 of this report.

The full audit report is also publicly available on the Publications and Reports page of the ACSL website.

1.3   Audit Approach

The purpose of the NCSS is to build a culture of shared responsibility for safeguarding and to ensure that policies, practices, and codes of behaviour work together 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.

Therefore, this report provides a point-in-time assessment of the safeguarding practices implemented by the Carmelite Fathers in Australia and Timor-Leste and the extent to which it meets the requirements of the NCSS. Our testing procedures included the following:

- Interviews, observations and enquiry with the Carmelite Fathers leadership team, as well as interviews with 20 (28%) of Carmelite Fathers Australian and Timor-Leste members in relation to their understanding of safeguarding practices;
- Review of key safeguarding documents, policies and procedures;
- Assessment and testing of the design and operation of safeguarding controls implemented by the Carmelite Fathers in Timor-Leste; and
- A site visit to one parish with observations and interview of key personnel.

The ACSL Audit scope included a review of the operations in Timor-Leste. ACSL did not travel to Timor-Leste however had access to the report and supporting documentation from the safeguarding consultant who has worked with the Carmelite Fathers for the past three years. ACSL also interviewed several clergy and students in the seminary. The audit team interviewed members who spoke English which provided sufficient information to inform the audit findings. The identity of these men was confirmed by the Provincial of the Carmelite Fathers. The findings from these interviews have been incorporated into the Assessment of Compliance in the following section of the report. In summary, ACSL supports the work of the Carmelite Fathers in Timor-Leste and acknowledge the cultural and other barriers in their ministry and in creating and embedding a safeguarding culture for children and adults at risk.

Whitefriars College was established as a Catholic Secondary School for boys by the Carmelite Order in 1961. Whitefriars offer a secondary education which is built on the foundation of the Carmelite tradition, of being aware of the Presence of God in everyday things, or walking in the Presence of God. Whitefriars has a range of policies and procedures to ensure they provide the best learning environment for our students and ensure the safety and wellbeing of the whole College community. The College policy list, available on their

website, has extensive safeguarding materials that would be of interest to all parents. Whitefriars College has been admitted to the National Redress Scheme, which provides acknowledgement and support to people who could have possibly experienced institutional child sexual abuse. Whitefriars College is a CIS (Council of International Schools) Accredited School. The school has completed a Declaration of Assurance which confirms their activities, including their child safety practices, are subject to existing regulatory requirements and external accreditations. Accordingly, under the current ACSL audit framework the school is not required to be re-audited by ACSL.

1.4   Overall Audit Findings

Assessment of the implementation of NCSS Indicators has been determined using a four-point maturity scale.[1]

Our assessment indicates that the Carmelite Fathers have fully implemented or have substantially progressed in the implementation of 76[2] (97%) indicators which are relevant to their operations. The key findings from the audit are summarised below.

NCSS Standard 1 – Committed leadership, governance and culture

There is a comprehensive suite of safeguarding policies which have been disseminated to all personnel and ministries, along with associated training, resources and support materials.

The Carmelite Fathers have substantially progressed in the development of a formal risk management framework, with risk assessments having been completed for a number of key activities and ministries. Specific training has also been developed and disseminated on the risk assessment process.

The Carmelite Fathers have also progressed on the implementation of the NCSS in its overseas ministries in Timor-Leste, with personnel in these areas having a strong understanding of safeguarding requirements and how these could be practically applied within the local context.

The Carmelite Fathers are yet to formally appoint a safeguarding representative in Timor-Leste. The Safeguarding Officer role is held unofficially by a member of clergy in Timor-Leste and whilst all those interviewed know who the person is, ACSL recommends as a matter of urgency that a person is named and confirmed in the role. ACSL further recommends that the person appointed has a role description and that the person's appointment and their responsibilities are communicated to the Carmelites in Australia and Timor-Leste.

The Carmelites Fathers are aware of the cultural differences between Australia and Timor-Leste and in response to NCSS governance requirements commissioned a report from a reputable Safeguarding Consultant to assess, analyse and recommend changes to their operations. Since the report findings in 2019, the Carmelite Fathers have undertaken significant work in Timor-Leste to strengthen their safeguarding practices. The recommendations from the findings from these reports have and are still being implemented.

For parishes managed by the Carmelite Fathers in Australia, documentation reflects the diocesan approach to safeguarding, since the Fathers' contact with children primarily occurs in these settings. Nonetheless, it would be beneficial for the Carmelite Fathers to develop their own accessible documentation for their Order.

As the report findings are being implemented in Timor-Leste, ACSL recommends that all risk management processes for activities are reviewed, and where processes are not yet in place that management processes are developed and implemented for all activities.

NCSS Standard 5 – Robust human resource management

Operations in Timor-Leste can prove challenging given the local administrative arrangements. It is impossible for the Carmelite Fathers to secure a legal document from police authorities, which is the equivalent of a

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[1] Refer Appendix A for definitions of the maturity scale used for the Compliance Assessment.
[2] Of the 84 NCSS Indicators applicable to Category Two, 6 of these are not relevant to the Carmelite Fathers operations.

Working With Children/Vulnerable Adult check, for any candidate. Despite this, the Carmelite Fathers are able to secure a police and identity check on all candidates. The Carmelite Fathers are to be commended for their work in this country and their sensitivity to implementing standards in a different cultural context. Implementing a formal supervision policy for members in Australia and Timor-Leste will assist the Carmelite Fathers to continue to comply with best practice human resource management.

There are two main Carmelite centres in Timor-Leste. In the capital Dili, the Carmelites have a home of hospitality for Carmelite seminarians and accommodation for scholarship recipients from the parish of Zumalai. At Hera, just outside Dili, the Carmelite Fathers operate a formation house for young Carmelites. The seminary runs several subjects on safeguarding in their ethical and moral philosophy courses throughout their formation program. Safeguarding elements covered include the provision of training materials from the external safeguarding consultant who has previously reviewed the Carmelite Fathers' operations. ACSL recommends that specific safeguarding courses that detail the Carmelite Fathers' operational polices and safeguarding systems are developed and introduced to the formation program and these courses are delivered annually whilst candidates are in formation.

NCSS Standard 6 – Effective complaints management

The ACSL 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.

The Carmelite Fathers have a detailed complaints handling section and flowchart as part of their Safeguarding Policy, which provides guidance on receiving and managing potential complaints. There have been complaints in the Australian operation's history and there are complaints in progress.

ACSL recommends the Carmelite Fathers develop a child friendly and accessible or 'Easy Read' version of the Complaints Handling Policy.

NCSS Standard 7 – Ongoing education and training

The Carmelite Fathers have provided appropriate safeguarding training to all personnel, with formal records maintained. Relevant members of the leadership team attended the NCSS Introductory Session for Leaders. There have also been opportunities for personnel to participate in safeguarding programs.

NCSS Standard 8 – Safe physical and online environments

The Carmelite Fathers Code of Conduct provides guidance on appropriate and expected standards of behaviour in relations to online environment. The Carmelite Fathers would benefit from an IT Policy that includes website protocols and procedures addressing e-safety and providing guidance on the expectations regarding use of technology and the internet.

Third parties and contractors who conduct work on the Carmelite Fathers premises are required to sign in and out and are appropriately supervised.

NCSS Standard 9 – Continuous improvement

The Carmelite Fathers have well documented safeguarding procedures, which are updated as required on a regular basis. They continue to implement the recommendations of their safeguarding consultant in relation to ministries in Timor-Leste.

NCSS Standard 10 – Policies and procedures support child safety

Key policies and procedures relating to safeguarding requirements are in place.

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

National Catholic Safeguarding Standard	# NCSS Indicators (Category Two)	Not Relevant to Carmelite Fathers	Assessment of Compliance			
			Managed & measurable	Defined & developed	Initial / Ad hoc	Not addressed
1: Committed leadership, governance & culture	**14**	-	9	5	-	-
5: Robust human resource management	**21**	-	16	5	-	-
6: Effective complaints management	**24**	-	22	2	-	-
7: Ongoing training & education	**7**	-	5	2	-	-
8: Safe physical and online environments	**6**	4	-	-	2	-
9: Continuous improvement	**6**	2	2	2	-	-
10: Policies and procedures support child safety	**6**	-	6	-	-	-
TOTAL	**84**	**6**	**60**	**16**	**2**	**-**
			76 (97%)		**2 (3%)**	

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

There are no Priority 1 (high rated) audit recommendations for the Carmelite Fathers. There are six Priority 2 (medium rated) audit recommendations for the Carmelite Fathers which are detailed in Section 3 of this report. These recommendations contain the Carmelite Fathers response to the audit findings and associated management actions.

We would like to thank the Provincial of the Carmelite Fathers and members of the leadership team and all who were involved in the audit for their cooperation and assistance.

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[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

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

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: Requirements of the Indicators 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: • promoting child safeguarding regularly; • emphasising that child-safeguarding is everyone's responsibility; and • actively monitoring safeguarding compliance and risk management.	✓			
1.2.4	Personnel understand that child safeguarding is everyone's responsibility and are empowered to provide input on child safeguarding practices.	✓			
Observations: Requirements of the Indicators are in place. No recommendations for improvement noted.					

Criterion 1.3 - Governance arrangements facilitate implementation of a Child Safeguarding Policy across the entity's activities.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.3.1	Governance arrangements are transparent and include safeguarding roles and responsibilities to ensure accountability for safeguarding is clear.		✓		
1.3.2	Where the Church Authority's governance includes countries other than Australia, the entity must apply these Standards taking into account relevant international declarations and local legislation.		✓		
Observations: 1.3.1. & 1.3.2. The Carmelite Fathers have not officially confirmed a safeguarding officer in Timor-Leste and ACSL recommend that a person is named. The Carmelite Fathers have undertaken considerable work in safeguarding in Timor-Leste. ACSL recommends that it continues to implement the report findings. Refer Recommendation #1.					

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	✓			

		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
	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:

1.4.2. ACSL recommend the Carmelite Fathers develop their own accessible language Code of Conduct for their Order rather than rely on resources developed by the dioceses in which they operate. Refer to Recommendation #1.

Criterion 1.5 - The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.5.1	The entity has a clearly documented child safeguarding risk management plan, as part of its overall risk management strategy, which considers actual and potential risks relating to children.	✓			
1.5.2	The entity has appropriate risk management processes in place to assess, evaluate, review and oversee the safeguarding of children participating in, or receiving, ministries offshore including cultural immersions, pilgrimages, solidarity campaigns and world youth days.		✓		
1.5.3	Leaders of the entity manage safeguarding risks effectively, through regular identification, monitoring, reporting and review of risks.		✓		

Observations:

1.5.2 & 1.5.3. There are some risk management processes in place for some of the activities in Timor-Leste, however risk management processes need to be fully implemented for all activities. Refer to Recommendation #1.

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:

Requirements of the Indicators 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	✓			

		Managed & Measurable	Defined & developed	Initial/ Ad-hoc	Not Addressed
	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: • that children are valued and respected. • the commitment of the entity to child safeguarding; and • where appropriate to the role, an understanding of children's developmental needs and culturally safe practices.	✓			

Observations:

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

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: • personnel have a current working with children check as required by legislation, prior to working with children; and • where a working with children check is not required by legislation, other background checks for personnel are conducted prior to working with children.		✓		
5.2.2	The entity keeps records and monitors the status of working with children checks and/or background checks for all personnel.	✓			

Observations:

5.2.1. There are no working with children statutory checks available in Timor-Leste. There are police checks available and these are in place for personnel. Refer Recommendation #2.

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 ACSL are required to participate in the NCSS Introductory Session for Leaders within four months of commencement.	✓			

Observations:

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

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

		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 o 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:

5.5.2. Implementing all the NCSS requirements across the operations in Timor-Leste prove challenging given the local administrative arrangements. The Carmelite Fathers are to be commended for their work in this country and their sensitivity to implementing standards in a non-western culture. A formal supervision policy for Australia and Timor-Leste will assist the Carmelite Fathers to continue to comply with this indicator. The Carmelite Fathers should make use of any further statutory reporting that becomes available in Timor-Leste for candidates or any personnel.

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. The seminary runs several courses in their formation program which incorporate safeguarding. Refer to Recommendation #2.

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.	✓			

Criterion 5.8 - Entities which receive overseas clergy and religious for work in ministry have targeted programs for the screening, induction, professional supervision, and development of these individuals.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
5.8.1	Selection and screening procedures for overseas clergy and religious are targeted, thorough and follow, as far as practicable, the same processes as for Australian personnel. This includes the Australian Church Authority obtaining screening information from the International Church Authority.	✓			
5.8.2	All overseas clergy and religious participate in a Safeguarding Induction program, documented by the entity, before work with children begins.	✓			
5.8.3	Overseas clergy and religious are supported with a suitable mentor for at least the first two years of their time in Australia.	✓			
5.8.4	The entity promotes as normative the participation of all overseas clergy and religious in active ministry in no less than six hours of professional/pastoral supervision per year.	✓			

Observations:

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

Standard 6	Effective complaints management

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

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 Indicator 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. There is work still to be done to fully develop and embed the use of child-friendly policies throughout the Carmelite Fathers ministries. ACSL notes that the Carmelite Fathers have yet to fully develop child-friendly versions of their own key safeguarding policies and where appropriate rely on the child-friendly polices they rely on in the parishes they minister. Refer to Recommendation #3.

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		✓		

		Managed & Measurable	Defined & developed	Initial/ Ad-hoc	Not Addressed
	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:

6.3.3. The Carmelite Fathers are yet to develop a Safeguarding Disciplinary and Grievance Policy. Refer to Recommendation #3.

6.3.7. The Carmelite Fathers are yet to develop a Whistleblowers Policy. Refer to Recommendation #3.

Criterion 6.4 - The entity has policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether 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: • 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

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

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: • 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. Refer to Recommendation #2 which recommends ongoing training for seminarians and personnel in Timor-Leste.
7.1.2. The Carmelite Fathers have stable personnel, with few people leaving or being onboarded, and this indicator has yet to be tested. It was noted that some personnel will be leaving a Diocese in which they operate later this year; there is now an opportunity for the Carmelite Fathers to provide their own induction training to new personnel, alongside induction training authorised by the diocese in which they operate

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: • Reporting criminal behaviour to police; • Mandatory reporting to child protection authorities; • Reportable Conduct Scheme; and • Reporting to regulatory authorities/government departments	✓			

Observations:

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

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

Criterion 8.2 - The online environment is used in accordance with the entity's Code of Conduct, safeguarding policies and procedures.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
8.2.1	Personnel access and use online environments in line with the entity's Code of Conduct and relevant communication protocols.			✓	
8.2.2	The entity routinely monitors the online environment, reporting and responding to breaches of its Code of Conduct or child safeguarding policies in accordance with the entity's disciplinary, complaint handling or other relevant processes.			✓	

Observations:

8.2.1 & 8.2.2. The clergy in the Carmelite Fathers use a range of different email services to engage in work associated with the Carmelite Fathers. ACSL recommend these arrangements are ceased and all personnel are required to use the Carmelite domain name to engage in work associated with the Carmelite Fathers Inc. Refer to Recommendation #5.

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.	Not applicable to the Carmelite Fathers			
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 applicable to the Carmelite Fathers			

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.	Not applicable to the Carmelite Fathers		
8.4.2	The entity has conducted sufficient due diligence on all third parties who use the entity's facilities to ensure child safeguarding practices and policies are in place.	Not applicable to the Carmelite Fathers		

Observations:

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

Standard 9	**Continuous improvement**

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

Criterion 9.1 - The entity regularly reviews and improves child safeguarding practices.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
9.1.1	The entity has a clearly documented Safeguarding Implementation Plan which outlines the monitoring and continual improvement of child safeguarding practices. The Child Safeguarding Implementation Plan is regularly reviewed, progress is tracked, and actions/strategies updated.	✓			
9.1.4	The entity's Child Safeguarding Policy is subject to regular review – at least every three years.	✓			

Observations:

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.		✓		

Observations:

9.2. The audit noted that the Registrar of Incidents does not include details of the investigation process that would be applied. Refer to Recommendation #6.

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 ACSL			
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

Policies and procedures document how the entity is safe for children

Criterion 10.1 - Policies and procedures address National Catholic Safeguarding Standards.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
10.1.1	All relevant policies and procedures reference appropriate safeguarding approaches, requirements and responsibilities.	✓			

Observations:
Requirements of the Indicator 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 all personnel	✓			

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

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	
Criterion 1.3 – Governance arrangements facilitate implementation of a Child Safeguarding Policy across the entity's activities.	**Priority 2**
Criterion 1.4 – A Code of Conduct provides guidelines for personnel on expected behavioural standards and responsibilities.	
Criterion 1.5 – The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children	

Details of finding	Our audit procedures indicate that in general, there is compliance with these requirements, with key personnel receiving the required training. The following points were noted: 1. The Safeguarding Officer role is held unofficially by a member of clergy in Timor-Leste. 2. The Carmelites Fathers are aware of the cultural differences between Australia and Timor-Leste and in response to NCSS governance requirements commissioned a report from a reputable Safeguarding Consultant to assess, analyse and recommend changes to their operations. 3. The Carmelite Fathers rely on the various diocesan accessible, child friendly documentation in their parishes since their contact with children primarily occurs in these settings. The Carmelite Fathers have not developed their own specific accessible documentation which could be used across their operations. 4. Risk assessments need to be completed for all activities in Timor-Leste.
Recommendation	1. A person, after a suitable discernment process, is officially appointed to the Safeguarding Officer role in Timor-Leste. ACSL further recommends that the person appointed has a role description and that the persons appointment and their responsibilities are communicated to the Carmelites in Australia and Timor-Leste. 2. The recommendations developed from the 2019 report conducted by the external safeguarding consultant continue to be implemented. 3. The Carmelite Fathers develop their own accessible language documentation for children and adults at risk. 4. ACSL recommends that all risk management processes for activities are reviewed and where there are no processes in place that management processes are developed and implemented for all activities.
Agreed Action	1. An appropriate person will be appointed to the Safeguarding Officer role in Timor-Leste with a role description. The appointment and responsibilities will be communicated to the Carmelites in Australia and Timor-Leste. 2. The Timor-Leste Report recommendations will continue to be implemented. 3. The Carmelite Fathers will develop accessible language documentation. 4. Risk management processes for Carmelite activities will reviewed and management processes developed and implemented for all activities.
Responsibility	Provincial
Due date	30 June 2023

Standard 5: Robust human resource management

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

Recommendation #2	
Criterion 5.2. – Relevant personnel (including all seminarians, clergy and religious) have current working with children checks or equivalent background checks.	**Priority 2**
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.	
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	1. The Carmelite Fathers parishes operate within the Archdioceses of Melbourne (Port Melbourne), Diocese of Paramatta (Wentworthville) and Archdiocese of Brisbane (Coorparoo) and thus are supported by the relevant professional safeguarding teams of each governing entity. ACSL conducted a site visit to one parish (as a representative sample). Testing procedures in this parish demonstrated strong compliance with the relevant NCSS indicators. 2. The operations in Timor-Leste prove challenging for the Carmelite Fathers given the local administrative arrangements. While the Carmelite Fathers can secure a police and identity check on all candidates, it is impossible for the Carmelite Fathers to secure a legal document from police authorities the equivalent of a Working With Children/Vulnerable Adult check for any candidate. 3. The Carmelite Fathers are to be commended for their sensitivity to implementing standards in a different cultural context. 4. The seminary runs several subjects on safeguarding throughout courses in the formation program and also incorporates training from the safeguarding consultant who reviewed their operations.
Recommendation	1. ACSL recommends a formal Supervision Policy is introduced for all personnel, detailing requirements of regular supervision and yearly appraisal expectations for all personnel and seminarians. 2. The Carmelite Fathers continue to secure police checks for potential candidates and review these regularly. If other regulatory checks become available in the future the Carmelite Fathers should use these to screen potential candidates. 3. ACSL recommends that specific courses on safeguarding and combating clericism are introduced to the formation program and these made available whilst candidates are in formation.
Agreed Action	1. The Carmelite Fathers will introduce a formal Supervision Policy for all personnel, detailing requirements of regular supervision and yearly appraisal expectations for all personnel and seminarians. 2. The Carmelite Fathers continue to secure police checks for potential candidates and review these regularly. If other regulatory checks become available in the future the Carmelite Fathers should use these to screen potential candidates. 3. The Carmelite Fathers will introduce specific courses on safeguarding and clericism to the formation program and these made available whilst candidates are in formation.
Responsibility	Provincial
Due date	30 June 2023

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 #3	Priority 2
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.	
6.3.3 – The Complaints Handling Policy is aligned and operates in conjunction with the entity's 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.	
6.3.7 – Documented policies and processes empower and support personnel to raise, in good faith, concerns and allegations about unacceptable behaviour towards children by other personnel.	

Details of finding	The following points were noted: 1. The Carmelite Fathers have a detailed complaints handling section and flowchart as part of its Safeguarding Policy, which provides guidance on receiving and managing potential complaints. These have been translated into Tetum. 2. There have been complaints in the Australian Order's history and there are complaints in progress. 3. The Carmelite Fathers have yet to develop a child friendly and accessible or 'Easy Read' version of the Safeguarding Complaints Handling Policy.
Recommendation	1. The Carmelite Fathers develop and embed child-friendly policies for their Institute and ensure parishes have such policies in place accordingly to local diocesan processes. 2. The Carmelite Fathers a develop a Safeguarding Disciplinary and Grievance Policy. 3. The Carmelite Fathers develop a Whistleblowers Policy to complement their Complaint Policy.
Agreed Action	1. The Carmelite Fathers will develop and embed child-friendly policies for their Institute and ensure parishes have such policies in place accordingly to local diocesan processes. 2. The Carmelite Fathers will develop a Safeguarding Disciplinary and Grievance Policy. 3. The Carmelite Fathers will develop a Whistleblowers Policy to complement their Complaint Policy
Responsibility	Provincial
Due date	30 June 2023

Standard 7: Ongoing education and training

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

Recommendation #4	
Criterion 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).	**Priority 2**
Criterion 7.1.2 – The entity's induction and refresher safeguarding training must as a minimum cover: • **Code of Conduct;** • **Safeguarding risk management;** • **Child Safeguarding Policy and procedures;** • **Complaints Handling Policy and procedures;** • **Reporting obligations; and e-safety training.**	
Details of finding	The following points were noted: 1. The Carmelite Fathers have provided appropriate safeguarding training to all personnel, with formal records maintained. Relevant members of the leadership team attended the NCSS Introductory Session for Leaders. 2. There have also been opportunities for personnel to participate in safeguarding training in Timor-Leste.
Recommendation	1. Refer to Recommendation #2 2. It was noted that some personnel will be leaving a diocese later this year. As well as relying on diocesan safeguarding induction training for new personnel, the Carmelite Fathers should provide their own safeguarding induction to new personnel.
Agreed Action	1. The Carmelite Fathers will provide induction training on their organisational safeguarding polices to all new personnel.
Responsibility	Provincial
Due date	30 June 2023

Standard 8: Safe physical and online environments

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

Recommendation #5	
8.2.1 – Personnel access and use online environments in line with the entity's Code of Conduct and relevant communication protocols.	**Priority 2**
8.2.2 – The entity routinely monitors the online environment in line with the entity's Code of Conduct and relevant communication protocols.	
Details of finding	The following points were noted:

	1. The Carmelite Fathers Code of Conduct provides guidance on appropriate and expected standards of behaviour in relations to online environment.
	2. The Carmelite Fathers should improve their Use of IT Policy as well as website protocols and procedures to address e-safety and provide guidance on the expectations regarding use of technology and the internet.
	3. Some clergy do not utilize the Carmelite domain name when sending and receiving emails.
Recommendation	1. The Carmelite Fathers implement a Use of IT policy which will address website protocols and procedures.
	2. All Carmelite Fathers and personnel should be provided with a Carmelite domain based email address for use throughout their ministries.
Agreed Action	1. The Carmelite Fathers will implement a Use of IT Policy.
	2. The Carmelite Fathers will use their domain name for the conduct of their ministries and operations.
Responsibility	Provincial
Due date	June 30, 2023

Standard 9: Continuous improvement
Entities regularly review and improve implementation of their systems for keeping children safe

Recommendation #6	
Criterion 9.2.1 –Processes are in place to analyse individual incidents or complaints relating to child safeguarding practices and/or failures.	**Priority 2**
Criterion 9.2.2 –Processes are in place to identify systemic issues or patterns and drive continuous improvement.	
Details of finding	The following points were noted: 1. The audit noted that the Registrar of Incidents does not include details of the investigation process applied.
Recommendation	1. A Safeguarding Implementation Plan, including monitoring and self-audit processes, should be developed and actioned, with target dates identified and monitored.
Agreed Action	1. The Carmelite Fathers Registrar of Interests will be updated to include details of the process applied to investigate the incident.
	2. A comprehensive Safeguarding Implementation Plan will be developed and implemented.
Responsibility	Provincial
Due date	June 30, 2023

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	• 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.	• Processes are non-existent. • Processes exist however the specific requirements of the Indicator have not been addressed.	• No resources have been assigned.

Initial/Ad-Hoc	• The entity has commenced to address the Indicator, however processes are ad-hoc or are applied on a case-by-case basis.	• Some relevant processes have been implemented which align with the requirements of the Indicator, however they are:
		  • siloed; and/or
		  • undocumented; and/or
		  • inconsistent; and/or
		  • lack clarity.
			• Capabilities vary across the entity.
			• Resources are not formally assigned.

Defined and Developed	• The entity has addressed the Indicator and is in the process of implementing the requirements across the entity.	• Relevant processes have been defined and developed, however are yet to be rolled out across the full operations of the entity.	• 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	• The entity has demonstrated that Indicator requirements are formally embedded and are operating effectively and continuously.	• Relevant processes are integrated and coordinated, including remote operations and activities.	• 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

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

Priority 1	Priority 2	Priority 3
Gaps or control weaknesses have been identified resulting in non-compliance with the indicator.	Progress has been made with respect to implementation of the required indicator, however full compliance is yet to be achieved.	Issues have been identified which represent minor procedural weaknesses or improvement opportunities with respect to the operation of the indicator.
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.	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.	Expected resolution is within 12 months or earlier from the issuance of this report.

Appendix C

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	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 Child abuse, when referenced throughout the National Catholic Safeguarding Standards, includes: • 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;
	• 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: • recruitment; • risk management; • complaints handling; and • acceptable use (information and communication technology).
Church Authority	means: A. the diocesan bishop (or archbishop, as appropriate) of a diocese or his administrator from time to time; B. the Australian major superior in respect of religious institutes; or C. the canonical steward in relation to a particular Catholic entity in respect of other Catholic entities not referred to in (a) or (b) above.
Civic engagement	means individual and collective actions designed to identify and address issues of public concern. Civic engagement includes citizens working together to make a change or difference in the community. The goal of civic engagement is to address public concerns and promote the quality of the community.
Clergy	means the body of those ordained in sacred ministry in the Church. They are either deacons, priests or bishops.
Cleric	means a member of the clergy.
Clericalist/ism	means an attitude toward clergy/religious characterised by an excessive deference and an assumption of their moral superiority. Pope Francis has said of clericalism that it occurs when "clerics feel they are superior, [and when] they are far from the people." He goes on to say that clericalism can be "fostered by priests themselves or by lay persons".

	When fostered by priests it may be demonstrated in an attitude where clerics see themselves as self-sufficient, superior to and separate from accountabilities of the world beyond the Church. When fostered by lay people it may be demonstrated by thinking that their contributions to the life of the Church are second-rate, or that in all things, surely 'Father knows best'.
	The features of clericalism are not restricted to the ordained (clergy and religious) nor to the Church alone. Abuse of an individual's function, role or power could be considered clericalist and could be exemplified through other attitudes such as not allowing criticism, being didactic rather than dialogical and being controlling rather than caring. It exists in hierarchical institutions such as academia, legal and medical establishments, the police and the military.
Complainant	means any person who makes a complaint that may include any allegation, suspicion, concern, or report of a breach of the entity's code of conduct. It also includes disclosures made to an institution that may be about, or relate to, abuse in the entity's context.
Conflicts of interest	means situations where a conflict arises between a person's official duties and their private interests, which could influence the performance of those official duties. Such conflict generally involves opposing principles or incompatible wishes or needs.
Cultural safety	means an environment that is safe for people of all ethnicities and cultural identities: where there is no assault, challenge or denial of their identity, of who they are and what they need. It is about shared respect, shared meaning, shared knowledge and experience, of learning, living and working together with dignity and truly listening.
Dicastery	means departments of the Roman Curia, including the Secretariat of State, congregations, tribunals, councils and offices.
Diocese	means ecclesiastical jurisdiction under the leadership of a bishop or an archbishop. In this document it is used as an inclusive term, including eparchies, ordinariates and personal prelatures.
Entity	means an entity that has been identified as Catholic by a competent authority within the Catholic Church.
Eparchy	means a term used by the Eastern Catholic Churches to denote ecclesiastical jurisdictions under the leadership of a bishop or an archbishop (also called an eparch or an archeparch).
Exposure to family violence	refer to 'child abuse'.
Formation/formation program	means a program preparing individuals for ordination or profession of vows as well as a life-long journey to the invitation of Christ to proclaim and live the Gospel message within the life of the Church.
Grooming/grooming behaviour	refer to 'child abuse'.
Institutional abuse	means, in the formal setting of an institution, child abuse caused by factors such as:
	• 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 prelature	means a canonical structure of the Catholic Church which comprises a prelate, clergy and laity who undertake specific pastoral activities. The first personal prelature 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.