

Order of the Servants of Mary  
Australian Delegation

# Order of Servants of Mary

## Safeguarding Audit Report September 2022

National Catholic  
Safeguarding Standards

Report prepared by:

**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.**

This report is available on the Publications and Reports page of the [ACSL website](#).

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# 1. Executive Summary – Order of the Servants of Mary

## 1.1 Context - Order of the Servants of Mary

Australian Catholic Safeguarding Ltd (ACSL) is responsible for supporting a nationally consistent approach to safeguarding across the Catholic Church in Australia. Established in 2020, ACSL brings together the work of Catholic Professional Standards Ltd (CPSL), the Australian Catholic Centre for Professional Standards (ACCPs) and the Australian Catholic Ministry Register (ACMR). ACSL 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 leadership, integrity, and compassion. 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 assessment against the National Catholic Safeguarding Standards for the Order of the Servants of Mary and the Servite College in Perth. The Order of the Servants of Mary requested that ACSL complete a separate audit report for the Servite College to ensure that one of their primary ministries, given the nature of their activities, are implementing the National Catholic Safeguarding Standards.

## 1.2 Background - Order of the Servants of Mary

The Order of the Servants of Mary (also known as Servite Friars or the Servite Order) 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 86 NCSS Indicators that apply to Category Two entities. For further details of the category system and the Indicators which are applicable, refer to the NCSS documentation available on [ACSL's website](#). The Order of the Servants of Mary have three parishes and one school ministry, with the parish ministries under the auspice of the Archdiocese of Perth. There are nine friars in the Community, two of whom are retired from active ministry. The assessment of how the Order of the Servants of Mary has implemented the National Catholic Safeguarding Standards is detailed in Section 2 of this report. Our recommendations for improvement, including the Order's management responses, are included in Section 3 of this report.

The Servite Order has governance over the [Servite College](#), a co-educational secondary school based in Perth. The Order of Servants of Mary requested a separate audit for the Servite College. There are 10 NCSS Standards, 49 NCSS Criteria and 111 NCSS Indicators that apply as the College is a Category One entity. The details of the audit findings and recommendations for the Servite College are presented in this report under the Annexure – Servite College.

The full audit report is also publicly available on the Publications and Reports page of the [ACSL website](#).

## 1.3 Audit Approach - Order of the Servants of Mary

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.

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 Order of the Servants of Mary and the extent to which it meets the requirements of the NCSS.

Our testing procedures included the following:

- interviews, observations and enquiry with the Order of the Servants of Mary Leadership Team, parish visits, and meetings with a Parish Council, individual Order members and relevant personnel. The audit team interviewed over 25% of the Order's personnel.
- a review of key safeguarding documents, policies, and procedures.
- a site visit to a parish, the priory for the friars, and Servite College; and
- an assessment of the design and testing of the operation of safeguarding controls implemented by the Order of the Servants of Mary.

The Provincial of the Order of the Servants of Mary contacted ACSL in December 2021 to discuss the possibility of conducting the audit in mid-2022. This audit was commenced in May 2022 with a review of the Order's documents and an assessment of policies and procedures. Discussions and interviews with personnel were conducted remotely, until the audit team visited from July 18 to July 24, 2022.

The findings in this report relate solely to the ministries or activities of the Order of the Servants of Mary which are not subject to external accreditation or processes. Annexure – Servite College details the findings of the Servite College which is subject to regulation through the Western Australian government and Catholic Education Western Australia.

## 1.4 Overall Audit Findings - Order of the Servants of Mary

Assessment of the implementation of NCSS Indicators has been determined using a four-point maturity scale.<sup>1</sup>

Our assessment indicates that the Order of the Servants of Mary has fully implemented or has substantially progressed in the implementation of 62<sup>2</sup> out of 69 (90%) indicators which are relevant to their operations.

The key findings from the audit are summarised below.

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

The executive team of the Order of the Servants of Mary serves as a Safeguarding Committee. ACSL recommends that the draft Terms of Reference for the Order's Safeguarding Committee be confirmed, which include the defined role, scope and accountabilities of the Safeguarding Committee to maintain and focus attention on safeguarding systems and practices. The current Safeguarding Committee comprises of the Provincial, Executive Officer and one of the friars. The proposed Terms of Reference opens the Committee to external membership providing a greater level of accountability.

A comprehensive suite of safeguarding materials and guidance has been developed and provided to members of the Order (friars), staff and volunteers. This includes a detailed Safeguarding Policy for Children and Young People (Safeguarding Policy), Commitment Statement and a draft Code of Conduct.

The Order has a strong framework around risk management.

### NCSS Standard 5 – Robust human resource management

The Order of the Servants of Mary has recruitment policies and procedures that outline safeguarding requirements in its advertising, vetting and screening of personnel. The Induction and Recruitment Policy and procedures clearly express zero tolerance of child abuse. The Order's draft Code of Conduct needs to be fully implemented for all personnel; that is, universally distributed and signed after training is provided. The Register of WWCC and other documentation including the member exemption table (for those outside of active ministry) is in keeping with requirements.

There is a requirement for personnel to undertake professional/pastoral supervision articulated in the Safeguarding Policy. However, this has yet to be fully implemented. The position description for the Administrator, Service Response, needs to be revised and updated since they hold primary responsibility for coordinating safeguarding activities across the Order. Moreover, all personnel are required to have supervision and annual appraisals. All

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

<sup>2</sup> Of the 86 NCSS Indicators applicable to Category Two, 17 of these are not relevant to the Order of the Servants of Mary operations.

position descriptions and employment contracts are to be reviewed to incorporate safeguarding clauses and adherence with the Order's Code of Conduct.

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

The ACSL audit does not re-assess the outcomes of individual complaints. The audit assesses procedures in place to prevent, detect, report and respond to any incidents and complaints, and the associated training, awareness and education available for all personnel.

The Order's Safeguarding Policy contains comprehensive complaints handling procedures, and all personnel have been provided with a range of materials which provide greater detail and information on the processes for reporting, investigating and managing complaints. Audit procedures indicate that complaints handling procedures are appropriate. There are no current complaints against the Servite Order, although there were three legacy complaints, some of which were considered during the Royal Commission hearings.

We note that the requirement to maintain safeguarding records for a minimum of 50 years, as directed by canon law, is documented in the Privacy Policy. The policy needs to be appropriately implemented.

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

Interviews with Order personnel indicate a strong understanding of the requirements for child safeguarding, including knowledge of the appropriate response should a complaint or concern be raised.

The Order has provided safeguarding training to all personnel, with records of attendance appropriately kept. The Order has developed additional safeguarding educational materials for the parishes in which they minister. Interviews with personnel and site visits indicate there is strong awareness and knowledge of safeguarding practices across the Servite community

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

The Order has a strong policy outlining its expectations around online activity, and online risks are well understood. The Order has instigated very high levels of online monitoring in all but one of its premises. As there is considerable cost to this level of monitoring and surveillance, the Order may want to consider whether this level of security is necessary or proportionate to the risk presented by personnel. The Order has procedures in place to manage contractors conducting work on their property.

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

The Order has a formal Safeguarding Implementation Plan, including self-audit and monitoring processes, which will be updated to include any actions arising from the ACSL audit.

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

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

Table 1 (next page) shows the overall assessment for each of the relevant Standards.

National Catholic Safeguarding Standard	# NCSS Indicators (Category Two)	Not Relevant to OSM	Assessment of Compliance			
			Managed & measurable	Defined & developed	Initial / Ad hoc	Not addressed
1: Committed leadership, governance & culture	14	1	8	2	3	-
5: Robust human resource management	23	12	8	1	2	-
6: Effective complaints management	24	-	19	4		1
7: Ongoing training & education	7	-	5	1	1	-
8: Safe physical and online environments	6	2	-	4	-	-
9: Continuous improvement	6	2	1	3	-	-
10: Policies and procedures support child safety	6	-	3	3	-	-
<b>TOTAL</b>	<b>86</b>	<b>17</b>	<b>44</b>	<b>18</b>	<b>6</b>	<b>1</b>
			62 (90%)		7 (10%)	

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

There are 4 Priority 1 (high rated) audit recommendations for the Order of the Servants of Mary. There are 8 Priority 2 (medium rated) recommendations and there is 1 Priority 3 (low rated) recommendation for the Order, which are detailed in Section 3 of this report. These recommendations also contain the Order's response to the audit findings, including associated management actions.

We would like to thank the Order of the Servants of Mary leadership team and all 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 - Order of the Servants of Mary

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: <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>	✓			
1.2.4	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 considering relevant international declarations and local legislation.	Not relevant to current operations			
Observations:					
Requirements of the Indicators are in place. However, one improvement could be made by The Order of the Servants of Mary by confirming the Safeguarding Committee Terms of Reference. Refer to <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 considers 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:**

1.4.1 – 1.4.3. The Order of the Servants of Mary have yet to finalise their Code of Conduct. It has also yet to be presented in alternative formats and training provided to members. Personnel have yet to confirm their adherence to the Code in writing. The Order's Code will (a) need to address the needs of all children including those of ATSI and CALD backgrounds and children with a disability; and (b) the Code of Conduct of Conduct is yet to be referenced in the Complaint Handling Policy and Procedures. Refer [recommendation #2](#).

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

**Observations:**

1.5.3. The Order of the Servants of Mary could define their safeguarding risks through reporting to the Safeguarding Committee. Refer [recommendation #3](#).

Criterion 1.6 - Personnel understand their obligations on information sharing and record keeping.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.6.1	The entity has documented information sharing and record keeping policies and procedures which are communicated to personnel.	✓			
1.6.2	The entity's information sharing and record keeping policies and procedures relating to all aspects of child safeguarding, including incidents and complaints, apply sound record keeping principles.	✓			

**Observations:**

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 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> 5.1.3. & 5.1.4 Whilst all staff have attended safeguarding induction/training, we note that safeguarding clauses should be inserted into any position descriptions, duty statements and employment contracts. Refer <a href="#">recommendation #4</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> Requirements of the Indicators are in place. No recommendations for improvement noted.					
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.	✓			
<b>Observations:</b> Requirements of the Indicators are in place. No recommendations for improvement noted.					

Criterion 5.4 – Ongoing supervision and people management is focused on child safeguarding		Managed & Measurable	Defined & developed	Initial/ Ad-hoc	Not Addressed
5.4.1	Support, mentoring, oversight and professional supervision processes for personnel include child safeguarding.			✓	
5.4.2	Annual performance reviews for personnel include child safeguarding responsibilities relevant to their role.			✓	
<b>Observation:</b> 5.4.1 & 5.4.2. The Order of the Servants of Mary supervision and annual appraisal processes are yet to focus on child safeguarding for all personnel. 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.	Not Relevant to the Order of Servants of Mary.			
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> Not applicable.					
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	Not relevant to the Order of the Servants of Mary.			
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 clericalism attitudes and behaviours.				

<b>Observations:</b> Not applicable.					
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.					

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:					
6.1.3. The Order of the Servants of Mary Complaint Handling process does not currently outline a procedure for identifying and mitigating actual and perceived conflict of interest in complaint management.					
6.1.5. The Order of the Servants of Mary is yet to clearly articulate the roles and responsibilities of key personnel in relation to handling complaints.					
6.1.6. The Order of the Servants of Mary has yet to identify the procedures and differentiate the process between a child victim and an adult bringing forward a complaint of abuse suffered as a child.					

6.1.7. The Order of the Servants of Mary needs to institute a process to record, store, protect and retain all child abuse complaints, incidents, allegations, disclosures, concerns and referrals for 50 years.

Refer [recommendation #6](#).

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:**

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> 6.3.3. The Complaints Handling Policy is yet to be fully aligned, and operate in conjunction, with the Order's documented disciplinary and grievance policies and processes. The current misalignment could cause confusion on which process will be followed in the event of a complaint. Refer <a href="#">recommendation #6</a> .					
<b>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.</b>		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.					
<b>Criterion 6.5 - Reporting, privacy and employment law obligations are met.</b>		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.					
<b>Criterion 6.6 - The Church Authority ensures mechanisms are in place to care for adult complainants.</b>		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.					
<b>Criterion 6.7 - The Church Authority ensures mechanisms are in place to monitor and support respondents facing allegations.</b>		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			
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: <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; and</li><li>• reporting obligations; and 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.		✓		
Observations:					
7.1.4. Members of the Safeguarding Committee have yet to undertake ACSL's NCSS Introductory Session for Leaders training. Members of the Safeguarding Committee should receive ongoing and professional development relevant to their role. 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 reporting to regulatory authorities/government departments</li> </ul>				
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**Observations:**

7.3.1 The Order should provide ongoing training to all personnel to equip them to appropriately respond to and support those bringing forward concerns, disclosures and allegations of child abuse. Refer [recommendation #8](#).

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 Order's Code of Conduct should reflect that online activity will be monitored. Refer <a href="#">recommendation #9</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.		✓		
Observations:					
It was noted that one of the physical environments used by the Order of the Servants of Mary is not monitored by the IT surveillance systems.					
8.3.1. All the Order of the Servants of Mary physical environments should be included in the IT surveillance systems. Refer <a href="#">recommendation #10</a> .					
8.3.2. The Order has yet to finalise their process for assessing and managing the risks posed to children in the event of a person with a substantiated complaint of child sexual abuse ongoing involvement in ministry. Refer <a href="#">recommendation #11</a> .					
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	Not applicable			



	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.	Not applicable
<b>Observations:</b> Not applicable		

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.		✓		
<b>Observations:</b> 9.1.4. An annual schedule for reviewing safeguarding policies and processes is not in place. Refer <a href="#">recommendation #12</a> .					
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> 9.2.1 & 9.2.1. There is no regular agenda item for the Order of the Servants of Mary Safeguarding Committee meetings to analyse individual incidents or complaints. Doing so would help to identify any systemic issues or patterns and drive continuous improvement. Refer <a href="#">recommendation #13</a> .					
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 Australian Catholic Safeguarding 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			
<b>Observations:</b> Not applicable N/A					

Standard 10	Policies and procedures support child safety
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<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> 10.1.1. Policies and procedures should be reviewed through the annual review schedule to ensure appropriate safeguarding approaches, requirements and responsibilities. Refer to <a href="#">recommendation #12</a> .					
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	✓			
<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> 10.3.1. & 10.3.2. Refer to <a href="#">recommendation #12</a> .					
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.	✓			
<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 - Order of the Servants of Mary



#### Standard 1: Committed leadership, governance and culture

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

Recommendation #1		Priority 1
1.3.1. Governance arrangements are transparent and include safeguarding roles and responsibilities to ensure accountability for safeguarding is clear.		
Details of finding	The Order of the Servants of Mary has draft Terms of Reference for their Safeguarding Committee, but these have yet to be ratified, formally implemented and communicated to personnel. The lack of full awareness of the Committee’s Terms of Reference could create some confusion from personnel on how safeguarding is embedded in the Order’s leadership, governance, and culture without this information. When the Terms of Reference are ratified then there will be greater clarity on governance arrangements including Safeguarding Committee roles, responsibilities, and accountability.	
Recommendation	The Terms of Reference for the Order of the Servants of Mary Safeguarding committee be endorsed and disseminated internally to personnel and externally to stakeholders such as community groups.	
Agreed Action	1. The Order of the Servants of Mary will confirm their Terms of Reference for the Safeguarding Committee. 2. When confirmed, the Terms of Reference will be communicated to all personnel.	
Responsibility	Fr. Peter Porteous, Provincial Delegate.	
Due date	October 14, 2022	

Recommendation #2		Priority 1
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 considers the needs of children, paying particular attention to Aboriginal and Torres Strait Islander children, children with a disability, children from a culturally and linguistically diverse backgrounds and children with vulnerabilities, for example, children who can't live at home.		
Details of finding	The Order of the Servants of Mary are developing a Code of Conduct which will align with that of the Archdiocese of Perth and the above NCSS indicators. The Order have developed some easy-to-read posters and documents which are used in parishes. As the Code of Conduct is ratified, the Order should present this in easy-to-read formats and consider if it needs to be translated to make it easier for the wider community to understand.	
Recommendation	<p>The Order of the Servants of Mary expedite this development, present it in alternative formats, provide training on the Code, and have all their personnel confirm their adherence via a written endorsement of the Code.</p> <p>The Order also ensure the Code addresses the needs of all children including those of Aboriginal Torres Strait Islander children and those from culturally and linguistically diverse backgrounds and children with a disability.</p>	

<b>Agreed Action</b>	<ol style="list-style-type: none"> <li>1. The Order of the Servants of Mary expedite the development of their Code of Conduct.</li> <li>2. The Code will also be available in multiple formats.</li> <li>3. The Order of the Servants of Mary will provide training on the Code and have all their personnel confirm their adherence via a written endorsement of the Code.</li> <li>4. The Order also ensure the Code addresses the needs of all children including those Of Aboriginal Torres Strait Islander children and those from culturally and linguistically diverse backgrounds and children with a disability.</li> </ol>
<b>Responsibility</b>	Fr. Peter Porteous, Provincial Delegate.
<b>Due date</b>	14 October, 2022

Recommendation #3		Priority 1
1.5.3. Leaders of the entity manage safeguarding risks effectively, through regular identification, monitoring, reporting and review of risks.		
Details of finding	The Order of the Servants of Mary have a draft Terms of Reference for their Safeguarding Committee.	
Recommendation	The Order endorse the Safeguarding Committee Terms of Reference and disseminate to internal and external stakeholders.	
Agreed Action	1. When the Safeguarding Committee Terms of Reference are endorsed by the Servants of Mary, they will be disseminated to internal and external stakeholders.	
Responsibility	Fr. Peter Porteous, Provincial Delegate.	
Due date	14, October 2022	



## Standard 5: Robust human resource management

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

Recommendation #4		Priority 2
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, reference 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 safeguarding; and</li><li>• Where appropriate to the role, an understanding of children’s developmental needs and culturally safe practices.</li></ul>		
Details of finding	The position descriptions of the Order of the Servants of Mary do not currently include safeguarding clauses.	
Recommendation	ACSL recommend that all Order of the Servants of Mary personnel have safeguarding clauses inserted into position descriptions, duty statements and employment contracts.	
Agreed Action	1. All Order of the Servants of Mary personnel will have safeguarding clauses inserted into position descriptions, duty statements and employment contracts.	
Responsibility	Fr. Peter Porteous, Provincial Delegate.	

<b>Due date</b>	31 March 2023
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Recommendation #5		Priority 1
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.		
Details of finding	The Order of the Servants of Mary are developing a Code of Conduct which will be congruent with the Archdiocese of Perth Code of Conduct.	
Recommendation	The Order of the Servants of Mary implement an ongoing supervision and annual appraisal processes that are focused on child safeguarding for all personnel.	
Agreed Action	1. The Order of the Servants of Mary will implement an ongoing supervision and annual appraisal processes that are focused on child safeguarding for all personnel.	
Responsibility	Fr. Peter Porteous, Provincial Delegate.	
Due date	14 October 2022	



### 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
6.1.3. There are clear procedures for identifying and mitigating actual and perceived conflict of interest in complaint management.		
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.		
Details of finding	The Order of the Servants of Mary NCSS complaint handling policies are in place. The procedures, that is, how the policy will be implemented need to be developed and communicated to personnel and wider community.	
Recommendation	6.1.3. The Order outline a procedure for identifying and mitigating actual and perceived conflict of interest in complaint management. 6.1.5. The Order clearly articulate the roles and responsibilities of key personnel in relation to handling complaints. 6.1.6. The Order identify the procedures and differentiate the process between a child victim and an adult brining forward a complaint of abuse suffered as a child. 6.1.7. The Order institute a process to record, store, protect and retain all child abuse complaints, incidents, allegations, disclosures, concerns, and referrals for 50 years.	

<b>Agreed Action</b>	<p>The Order of the Servants of Mary will:</p> <ol style="list-style-type: none"> <li>1. Develop a procedure for identifying and mitigating actual and perceived conflict of interest in complaint management.</li> <li>2. Clearly articulate the roles and responsibilities of key personnel in relation to handling complaints.</li> <li>3. Identify the procedures and differentiate the process between a child victim and an adult bringing forward a complaint of abuse suffered as a child.</li> <li>4. Institute a process to record, store, protect and retain all child abuse complaints, incidents, allegations, disclosures, concerns, and referrals for 50 years.</li> </ol>
<b>Responsibility</b>	Fr. Peter Porteous, Provincial Delegate.
<b>Due date</b>	31 March 2023



### Standard 7: Ongoing education and training

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

Recommendation #7		Priority 3
Criterion 5.1 – The entity ensures that personnel who have specified child safeguarding responsibilities, such as those applied to safeguarding co-ordinator and those appointed to the Safeguarding Committee, receive ongoing support and professional development in their role.		
Details of finding	ACSL note that when the draft Terms of Reference for the Order are endorsed, the membership of their Safeguarding Committee may change, and the new personnel will require formation in this role.	
Recommendation	When the membership of the Safeguarding Committee is confirmed, all personnel are to undertake ACSL’s NCSS Introductory Session for Leaders training and receive ongoing professional development relevant to their role.	
Agreed Action	<ol style="list-style-type: none"><li>1. All members of the Safeguarding Committee will undertake ACSL’s NCSS Introductory Session for Leaders training.</li><li>2. All members of the Safeguarding Committee will undertake professional development relevant to their role annually.</li></ol>	
Responsibility	Fr. Peter Porteous, Provincial Delegate.	
Due date	30 September 2023	

Recommendation #8		Priority 2
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.		
Details of finding	The Order’s personnel require annual refresher training on responding appropriately to anyone bringing forward concerns, disclosures and allegations of child abuse.	
Recommendation	The Order of the Servants of Mary provide training to all personnel to equip them to appropriately respond to and support those bringing forward concerns, disclosures and allegations of child abuse.	

<b>Agreed Action</b>	1. The Order of the Servant's personnel will undertake annual refresher training on responding appropriately to anyone bringing forward concerns, disclosures and allegations of child abuse.
<b>Responsibility</b>	Fr. Peter Porteous, Provincial Delegate.
<b>Due date</b>	31 March 2023



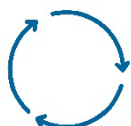
## Standard 8: Safe physical and online environments

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

Recommendation #9		Priority 2
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.		
Details of finding	The Provincial and executive team in the Order of the Servants of Mary must confirm their Code of Conduct and ensure this online monitoring clause is included.	
Recommendation	The Code of Conduct reflect that online activity will be monitored.	
Agreed Action	1. The Order of the Servant’s of Mary Code of Conduct will state that online activity will be monitored.	
Responsibility	Fr. Peter Porteous, Provincial Delegate.	
Due date	31 March 2023	

Recommendation #10		Priority 2
8.3.1. The entity assesses safeguarding risks in the physical environment under its control or management including buildings, structures, open spaces, grounds, homes of religious and clergy, and arrangements for live-in carers/caretakers.		
Details of finding	The Order of the Servants of Mary have yet to monitor the online environment of all the homes of clergy.	
Recommendation	Include all the physical environments of the Order of the Servants of Mary in the IT monitoring system.	
Agreed Action	1. The Order of the Servants of Mary will monitor all physical environment that personnel (including clergy) occupy.	
Responsibility	Fr. Peter Porteous, Provincial Delegate.	
Due date	31 March 2023	

Recommendation #11		Priority 2
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.		
Details of finding	If a known person of a substantiated complaint of child sexual abuse engages with the Order of the Servants of Mary, the draft process on how to manage this engagement has not been confirmed.	
Recommendation	The Order develop a process for assessing and managing the risks posed to children in the event of a person with a substantiated complaint of child sexual being involved in ministry.	
Agreed Action	1. The Order of the Servants of Mary will finalise their process for assessing and managing the risks posed to children in the event of a person with a substantiated complaint of child sexual being involved in ministry.	
Responsibility	Fr. Peter Porteous, Provincial Delegate.	
Due date	31 March 2023	



### Standard 9: Continuous improvement

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



### Standard 10: Policies and procedures support child safety

*Policies and procedures document how the entity is safe for children*

Recommendation #12		Priority 2
9.1.4. The entity's Child Safeguarding Policy is subject to regular review – at least every three years.		
10.1.1. All relevant policies and procedures reference appropriate safeguarding approaches, requirements and responsibilities.		
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.		
Details of finding	The Safeguarding Committee have yet to regularly review their suite of safeguarding policies. Policies and procedures will be reviewed through the annual review schedule to ensure appropriate safeguarding approaches, requirements and responsibilities.	
Recommendation	The Order of the Servants of Mary Safeguarding Committee develop an annual schedule for reviewing safeguarding policies and processes.	
Agreed Action	1. The Order of the Servants of Mary Safeguarding Committee will develop an annual schedule for reviewing safeguarding policies and processes.	
Responsibility	Fr. Peter Porteous, Provincial Delegate.	
Due date	31 March 2023	



Recommendation #13		Priority 2
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.		
Details of finding	The Order is yet to fully manage and analyse concerns and complaints to identify causes and systemic failures.	
Recommendation	The standard agenda of Safeguarding Committee meetings include an item to analyse individual incidents or complaints and then identify any systemic issues or patterns in order to drive continuous improvement.	
Agreed Action	1. The Order of the Servants of Mary Safeguarding Committee agenda will be sufficiently comprehensive to include reports on individual incidents and complaints whilst also analysing systemic issues and patterns that emerge from these complaints/incidents.	
Responsibility	Fr. Peter Porteous, Provincial Delegate.	
Due date	31 March 2023	

## Annexure – Servite College (Audit findings & Recommendations)

The Servite College is a coeducational Catholic secondary college under the governance of the Order of the Servants of Mary. The College is located in Tuart Hill, Perth and has recently acquired another campus at Nannup, a small town between Albany and Mount Barker in the Greater Southern region of Western Australia. The school has just over 1000 students enrolled in the College.

The Servite College 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 [ACSL website](#).

Our assessment of the Servite College’s compliance with the Category One Indicators is detailed in section A.3 of this report. Our recommendations for improvement, including College management responses, are included in section A.4 of this report.

The audit report is also publicly available on the Publications and Reports page of the [ACSL website](#).

### A.1 Audit Approach – Servite College

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.

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 Servite College and the extent to which it meets the requirements of the NCSS. Our testing procedures included the following:

- interviews, observations and enquiry with the Provincial, School Principal, Leadership Team, School Board, students, family members and relevant personnel.
- review of key safeguarding documents, policies and procedures.
- a visit to the Nannup campus; and
- assessment of the design, and testing of the operation of safeguarding controls implemented by the College.

### A.2 Overall Audit Findings – Servite College

Assessment of the implementation of NCSS Indicators has been determined using a four-point maturity scale.<sup>4</sup>

Our assessment indicates that the College has fully implemented or has substantially progressed in the implementation of 89 (98%) of the 91<sup>5</sup> Indicators which are relevant to their operations.

The key findings from the audit are summarised below.

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

The College leadership team demonstrates a strong commitment to safeguarding, which is evident in the culture of the College, and acknowledged by parents, students, and staff. The College draws on the Berry Street trauma-informed learning framework to support safeguarding and learning diversity. As an active participant in Catholic

<sup>4</sup> Refer Appendix B for definitions of the maturity scale used for the Compliance Assessment.

<sup>5</sup> Of the 111 NCSS Indicators applicable to Category One, 20 of these are not relevant to the Servite College’s operations.



Education Western Australia (CEWA)'s communities of practice, the College contributes to system-wide knowledge and practice in safeguarding. The College has embedded the 'Safe Care' curriculum from CEWA, at age-appropriate levels, and provides many opportunities for students and staff to explore contemporary issues around safeguarding.

A comprehensive suite of safeguarding materials and guidance has been developed and provided to members of the College community and staff. This includes a detailed Safeguarding Policy for Children and Young People.

The Servite College School Council does not have a Safeguarding Committee in place. Appointing a safeguarding committee would ensure that safeguarding responsibilities are shared throughout the College Community rather than relying on one role only (Safeguarding Coordinator) to take responsibility within the leadership team. Terms of Reference outlining the role and scope of this committee should be documented and its meetings formally recorded

The Servite College has a strong framework around risk management.

In relation to the new campus at Nannup, ACSL notes that a comprehensive safeguarding risk management plan will need to be developed and implemented prior to hosting further College activities. The campus is currently implementing the Work, Health and Safety audit findings from an independent consultant.

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

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

Servite College demonstrates a strong commitment to ensure its students are safe, informed and participate in decisions about their safety. A range of strategies are in place for engaging with children, carers and families to obtain feedback on its safeguarding policies and practices.

One student described this experience over several years in positive terms: *"I feel very heard, respected and important"*.

A key theme emerged from interviews with students and families: members of the College community have personally adopted the maxim – *once a Servite, always a Servite*. For students and staff interviewed, the meaning is clear. They feel they have absorbed and live the charisma, values, and principles of the Servite Order.

The values upheld by the College are congruent with safeguarding principles, for instance: Respect, Justice, and Courage. The College leadership, through surveys and consultations with families and students, explore to what extent the College values are being embraced, upheld and put into practice. Feedback is reviewed by the College's leadership team with a view to continuous improvement of the College's safeguarding policies and practices.

Child-friendly complaints materials, as well as information for children on safe and respectful peer relationships, including through social media, are being developed.

Students, parents and staff are confident in the use of 'Servite Concern', an app available to all associated with the College (student, personnel and families) to report concerns anonymously, and to identify issues or situations where there are real or perceived safety issues. This is considered a very important asset to safeguarding within the College community and is monitored constantly, with issues escalated to the appropriate level, including to the regulatory authorities when required.

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

Servite College has a strong focus on equity and diversity and the promotion of cultural safety through its engagement with local culturally and linguistically diverse communities. The vertical integration of the College fosters the engagement of students within the learning diversity stream, and this enables these students to participate in many mainstream activities. There are many safe places and activities organised to support neurodiverse students.

The College needs to continually incorporate information on equity and diversity into its general safeguarding training for all personnel. The College has yet to develop a policy on gender identity and diversity. The College could also translate their safeguarding resources into languages used by student families.

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

The College does not engage any volunteers and this decision has been determined through a safeguarding risk assessment.

All personnel employed by the College have position descriptions and are appropriately screened through a recruitment process that includes working with children checks. They receive a formal induction into their roles, which includes a compulsory safeguarding module. ACSL recommends that position descriptions include responsibilities for safeguarding awareness. ACSL recommends that all personnel should have regular and annual performance appraisals that includes feedback on safeguarding systems and practices.

The School Council membership does not appear to reflect the diversity of gender or cultures of the school students and their families. As vacancies arise, the College would benefit from having members on the Council who are more representative of the current College community.

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

The College has strong and effective complaint management processes in place, supported by CEWA. These policies and procedures are available to students, parents and staff through 'SEQTA' the College's information portal. All staff are aware of mandatory reporting requirements and complete a compulsory module during induction. The designated mandatory reporters are known to staff and parents. The use of the 'Servite Concern' app is supplemented by the online complaints management system facilitated through CEWA, for recording the management and outcomes of all complaints, critical incidents, and mandatory reporting events.

All of the College's records are stored on servers located in Australia. Access to records is managed by the College's IT Department. Complaints management processes adhere to CEWA requirements, as outlined in the WA legislation. The Royal Commission into Institutional Responses to Child Sexual Abuse has recommended that documented allegations of abuse are kept for 45 years and canon law for 50 years. The interrelationship between the College and the Servite Order requires any such records to be stored by both the College and Order in accordance with the Royal Commission recommendation.

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

Interviews with College personnel indicate a strong understanding of the requirements for child safeguarding, including knowledge of the appropriate response should a complaint or concern be raised.

ACSL note that annual refresher safeguarding training that covers the following elements will enhance the knowledge and skills of personnel:

- Code of Conduct.
- Safeguarding risk management.
- Child Safeguarding Policy and procedures.
- Complaints Handling Policy and procedures.
- Reporting obligations; and e-safety training.
- Cultural training; and
- Record keeping.

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

The College's use of Information Technology policy outlines its expectations around online activity. Online risks are well understood and included in risk assessments for College activities where required. Filtering is in place to block inappropriate online activity for devices which are networked with the College IT system.

The College has existing systems in place for the management of contractors.

The College conduct their arts and technology courses on an adjacent campus next to the College and whilst acknowledging resource implications, ACSL supports the College's future planning which includes moving these facilities into the College campus to offer greater safeguarding oversight.

The opening of the new campus at Nannup will require the College to undertake some detailed risk assessment activities which address safeguarding practices. Whilst the College has detailed assessments for the Tuart Hill campus, Nannup is a rural property, and the activities that may be undertaken will be different and therefore presents different safeguarding challenges.

The audit findings note the College needs to develop a policy and processes around managing any high-risk individual they become aware of, who may become a member of the wider school community.

## NCSS Standard 9 – Continuous improvement

The College has a formal Safeguarding Implementation Plan, including self-audit and monitoring processes, which will be updated to include the actions arising from the ACSL audit.

ACSL recommends the College hold a meeting to bring together key College leadership personnel, the Provincial, and Servite Order personnel for a briefing on the audit findings and to jointly develop strategies to address audit findings.

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

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

The following table shows the overall implementation assessment for each of the Standards

National Catholic Safeguarding Standard	# NCSS Indicators (Category One)	Not Relevant to Servite College	Assessment of Implementation			
			Managed & measurable	Defined & developed	Initial / Ad hoc	Not addressed
1: Committed leadership, governance & culture	16	2	12	2	-	-
2: Children are safe, informed and participate	5	-	5	-	-	-
3: Partnering with families, carers and communities	6	-	6	-	-	-
4: Equity is promoted, and diversity is respected	4	-	3	1	-	-
5: Robust human resource management	23	14	8	1	-	-
6: Effective complaints management	24	2	22	-	-	-
7: Ongoing training & education	9	-	7	2	-	-
8: Safe physical and online environments	10	-	9	1	-	-
9: Continuous improvement	8	2	2	2	2	-
10: Policies and procedures support child safety	6	-	4	2	-	-
<b>TOTAL</b>	<b>111</b>	<b>20</b>	<b>78</b>	<b>11</b>	<b>2</b>	<b>-</b>
			89 (98%)		2 (2%)	

Audit recommendations are classified according to priority and urgency for remediation.<sup>6</sup>

There are no Priority 1 (high rated) audit recommendations for the Servite College.

There are 11 Priority 2 (medium rated) recommendations and 1 Priority 3 (low rated) recommendations, which are detailed in Section A.3 of this report. Each recommendation also contains the Servite College's response to the audit finding, including management actions.

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

<sup>6</sup> Refer Appendix B for definitions of the Priority ratings used for audit recommendations.

### A.3. Assessment of Compliance with NCSS Indicators – Servite College

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.	✓			
<b>Observations:</b> 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: <ul style="list-style-type: none"><li>regularly promoting child safeguarding;</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> 1.2.2. The College does not have a Safeguarding Committee at the highest level of leadership. ACSL recommends that the Servite School Council point a Safeguarding Committee with appropriate terms of reference. Refer <a href="#">recommendation #1</a> .					
Criterion 1.3 - Governance arrangements facilitate implementation of a Child Safeguarding Policy across the entity's activities.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.3.1	Governance arrangements are transparent and include safeguarding roles and responsibilities to ensure accountability for safeguarding is clear.	✓			
1.3.2	Where the Church Authority's governance includes countries other than Australia, the entity must apply these Standards taking into account relevant international declarations and local legislation.	Not applicable to the College			

<b>Observations:</b> Requirements of the Indicators are in place. No recommendations for improvement noted.					
<b>Criterion 1.4 - A Code of Conduct provides guidelines for personnel on expected behavioural standards and responsibilities.</b>		<b>Managed &amp; Measurable</b>	<b>Defined &amp; Developed</b>	<b>Initial/ Ad-hoc</b>	<b>Not Addressed</b>
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 Indicators are in place. No recommendations for improvement noted.					
<b>Criterion 1.5 - The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children.</b>		<b>Managed &amp; Measurable</b>	<b>Defined &amp; Developed</b>	<b>Initial/ Ad-hoc</b>	<b>Not Addressed</b>
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 the College			
1.5.3	Leaders of the entity manage safeguarding risks effectively, through regular identification, monitoring, reporting and review of risks.	✓			
<b>Observations:</b> Requirements of the Indicators are in place. No recommendations for improvement noted.					
<b>Criterion 1.6 - Personnel understand their obligations on information sharing and record keeping.</b>		<b>Managed &amp; Measurable</b>	<b>Defined &amp; Developed</b>	<b>Initial/ Ad-hoc</b>	<b>Not Addressed</b>
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> 1.6.2. The College need to update their sharing and record keeping policy and procedures relating to all aspects of abuse, including incidents and complaints and apply sound record keeping principles. Refer <a href="#">recommendation #2</a> .					

## Standard 2

## Children are safe, informed and participate



Children are informed about their rights, participate in decisions affecting them and are taken seriously					
Criterion 2.1 - Children are informed about their rights, including safety, information and participation.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
2.1.1	The entity has age-appropriate strategies to proactively engage with children; seek children’s views; consult children about decisions that affect them; and consult children about what makes them feel safe and how this can be recognised and implemented by the entity.	✓			
2.1.2	The entity ensures children are made aware of their rights, including their right to be safe from abuse, and are informed whom to contact if they have concerns about their safety or the safety of their peers.	✓			
Observations: 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.	✓			
Observations: Requirements of the Indicator are in place. No recommendations for improvement noted.					
Criterion 2.3 - Where relevant to the setting and context, children and families may be offered access to abuse prevention programs and related information that is age-appropriate.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
2.3.1	Where relevant, the entity provides children and families with information, access and/or referral to abuse prevention programs, appropriate to the child’s age, development, ability and level of understanding.	✓			
Observations: Requirements of the Indicator are in place. No recommendations for improvement noted.					
Criterion 2.4 - Personnel are attuned to signs of harm and facilitate child-friendly ways for children to express their views, participate in decision-making and raise their concerns.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
2.4.1	Personnel have the knowledge, skills and awareness to identify potential signs of harm and actively support children to raise any concerns.	✓			
Observations: Requirements of the Indicator are in place. No recommendations for improvement noted.					
Standard 3		Partnering with families, carers and communities			
Families, carers and communities are informed and involved in promoting child safeguarding					
Criterion 3.1 - Families and carers participate in decisions affecting their child.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed



3.1.1	The entity supports and encourages families/carers to take an active role in monitoring children’s safety when participating in activities.	✓			
<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 abuse prevention.	✓			
<b>Observations:</b> Requirements of the Indicator are in place. No recommendations for improvement noted.					
Standard 4		Equity is promoted and diversity is respected			
Equity is upheld and diverse needs respected in policy and practice					
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> 4.1.1. The College needs to develop a policy and processes to support students who identify as gender diverse. Refer <a href="#">recommendation #3</a> .					
<b>Criterion 4.2 - All children have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.</b>		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. An observation, the College could translate their safeguarding materials into languages used by student families. Refer <a href="#">recommendation #3</a> .					
<b>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.</b>		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			
People working with children are suitable and supported to reflect child safeguarding values in practice					
Criterion 5.1 - Recruitment, including advertising, interview questions, referee checks and personnel pre-employment screening, emphasises child safeguarding.		Managed & Measurable	Defined & developed	Initial/ Ad-hoc	Not Addressed
5.1.1	The entity emphasises its commitment to child safeguarding and zero-tolerance approach to child abuse in all aspects of its advertising, screening and recruitment for personnel.	✓			
5.1.2	The entity documents its safeguarding approach in recruitment and screening procedures and processes.	✓			
5.1.3	Positions are assessed for the expected level of contact with children and appropriate child safeguarding recruitment procedures are implemented.	✓			
5.1.4	Position descriptions, selection criteria, referee checks and interview questions articulate:		✓		

	<ul style="list-style-type: none"> <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 need to be updated to include reference to the College's commitment to safeguarding. Refer <a href="#">recommendation #4</a> .					
<b>Criterion 5.2 - Relevant personnel (including all seminarians, clergy and religious) have current working with children checks or equivalent background checks.</b>		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> Requirements of the Indicator are in place. No recommendations for improvement noted.					
<b>Criterion 5.3 - Personnel receive an appropriate induction and are aware of child safeguarding responsibilities, including reporting obligations.</b>		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.		✓		
<b>Observations:</b> 5.3.2. The College leadership team and School Council have yet to attend the ACSL's NCSS Introductory Sessions for Leaders. Refer <a href="#">recommendation #5</a> .					
<b>Criterion 5.4 - Ongoing supervision and people management is focused on child safeguarding</b>		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. College personnel do not currently undergo annual appraisals which address safeguarding responsibilities, relevant to their role. Refer <a href="#">recommendation #6</a> .					
<b>Criterion 5.5 - 5.8 are not applicable to Servite College</b>					

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:					
6.1.6. The College should update their Complaint Handling Policy to reflect the different strategy which will be used when an adult brings forward a complaint of abuse suffered as a child. Refer <a href="#">recommendation #7</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.	✓			
Observations:					
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.	✓			
<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 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 Indicator 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 Indicator 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: <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 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. The College Induction process covers the safeguarding elements in 7.1.2. Nonetheless, topics such as e-safety are continually evolving, and personnel would benefit from annual refresher courses in all of these safeguarding domains. Refer <a href="#">recommendation #8</a> .					
<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>		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 understand, identify, and respond to abusive behaviours by a child towards another child.</li> </ul>	✓			
<b>Observations:</b> Requirements of the Indicators are in place. No recommendations for improvement noted.					
<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>		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 reporting to regulatory authorities/government departments.</li> </ul>	✓			
<b>Observations:</b> 7.3.2. The College record keeping policy is updated and disseminated to personnel. Refer <a href="#">recommendation #9</a>					
<b>Criterion 7.4 - Personnel receive training and information on how to build culturally safe environments for children.</b>		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> 7.4.1: The College provide annual cultural safety training to personnel. Refer <a href="#">recommendation #10</a> .					
<b>Standard 8</b>		<b>Safe physical and online environments</b>			

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

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
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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.	✓			

**Observations:**

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

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

**Observations:**

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

Criterion 8.3 - Risk management plans consider risks posed by the entity's settings, activities and physical environments.		Managed & Measurable	Defined & Developed	Initial/Ad-hoc	Not Addressed
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8.3.1	The entity assesses safeguarding risks in the physical environments under its control or management including buildings, structures, open spaces, grounds, homes of religious and clergy, and arrangements for live-in carers/caretakers.	✓			
8.3.2	Where an entity becomes aware that a person (other than personnel of that entity) attending any of its services or activities is the subject of a substantiated complaint of child sexual abuse or has been convicted of an offence relating to child sexual abuse, the entity has in place and implements a process for assessing and managing the risks posed to children by that person's ongoing involvement in the service or activity.		✓		

**Observations:**



8.3.1. The College has an Arts and Technology precinct adjacent to the main campus. A major road divides the campuses, which could pose significant safeguarding risks of student movement. The Arts and Technology precinct is poorly designed for managing safeguarding risks.

8.3.2 The College does not have a written policy to address the issue of a high-risk individual becoming a member of the school community. Refer [recommendation #11](#).

Criterion 8.4 - Entities that contract facilities and services to and from third parties have procurement policies that ensure safeguarding of children.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
8.4.1	The entity considers the risks posed to children arising from any third parties engaged by the entity and conducts sufficient due diligence to ensure that the third party has appropriate child safeguarding practices and policies in place.	✓			
8.4.2	The entity has conducted sufficient due diligence on all third parties who use the entity's facilities to ensure child safeguarding practices and policies are in place.	✓			

**Observations:**

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.		✓		
9.1.2	The Church Authority monitors compliance with the National Catholic Safeguarding Standards during systematic visits to parishes, ministries and/or congregational works.			✓	
9.1.3	The Safeguarding Committee co-ordinates annual self-audits at a local level (parishes, ministries and/or congregational works).			✓	
9.1.4	The entity's Child Safeguarding Policy is subject to regular review – at least every three years.	✓			

**Observations:**

9.1.1; 9.1.2; 9.1.3. The Safeguarding Coordinator and Principal currently take responsibility for reviewing and improving safeguarding practices. This work competes with their existing priorities and will only be fully satisfied through the work of an effective Safeguarding Committee. The Safeguarding Committee which will be established can be allocated responsibility for these tasks, refer [recommendation# 12](#).

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> 9.2.2. See <a href="#">recommendation #12</a> .					
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			
<b>Observations:</b> 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:					
10.1.1 See <a href="#">recommendation #12</a> .					
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:					
10.3.2 See <a href="#">recommendation #12</a> .					
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.

## A.4 Detailed Findings – Servite College



### Standard 1: Committed leadership, governance and culture

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

Recommendation #1		Priority 2
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.		
Details of finding	The College has a Safeguarding Coordinator who is committed to the role and ensuring safeguarding practices are incorporated into the College activities. The College have yet to appoint a Safeguarding Committee which will assist this role and take overall responsibility for the College safeguarding systems and practices.	
Recommendation	ACSL recommends the College establish a Safeguarding Committee that reports quarterly to the School Council and Provincial. The Committee will be constituted by terms of reference that encompass reporting on quality assurance and continuous improvement processes.	
Agreed Action	<ol style="list-style-type: none"><li>1. The College will establish a College Safeguarding Committee that reports quarterly to the School Council and Provincial.</li><li>2. The Safeguarding Committee will be constituted by Terms of Reference that encompass reporting on quality assurance and continuous improvement processes.</li></ol>	
Responsibility	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.	
Due date	31 March 2023	

Recommendation #2		Priority 2
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.		
Details of finding	The audit found that sound record keeping principles are in place without formal acknowledgement of the 45 years recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse.	
Recommendation	The College update their sharing and record keeping policy and procedures relating to all aspects of abuse, including incidents and complaints to apply the 45-year record keeping principle recommended by the Royal Commission and 50 years for canon law.	
Agreed Action	1. The College will update their sharing and record keeping policy and procedures relating to all aspects of abuse, including incidents and complaints to apply to relevant record keeping principles.	
Responsibility	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.	
Due date	31 March 2023	



### Standard 4: Equity is promoted, and diversity is respected

*Equity is upheld and diverse needs respected in policy and practice*

Recommendation #3		Priority 2
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.		
Details of finding	The College does not have a policy on gender identity and diversity. The College have yet to translate their safeguarding materials into languages used by student families whose first language is not English.	
Recommendation	The College develop a policy and processes to support, if required, students who identify as gender diverse. The College develop their safeguarding materials into languages used by student families.	
Agreed Action	1. The College will develop a policy and processes to support, if required, students who identify as gender diverse. 2. The College develop their safeguarding materials into languages used by student families.	
Responsibility	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.	
Due date	31 March 2023	



### Standard 5: Robust human resource management

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

Recommendation #4		Priority 2
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 where appropriate to the role, an understanding of children’s developmental needs and culturally safe practices.</li></ul>		
Details of finding	Position descriptions that were sampled did not mention safeguarding.	
Recommendation	Position descriptions are updated to note that students are respected and reference the College’s commitment to safeguarding.	
Agreed Action	1. The College will update all position descriptions to note that students are respected and reference the College’s commitment to safeguarding.	
Responsibility	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.	
Due date	31 March 2023	

Recommendation #5		Priority 3
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.		
Details of finding	Members of the College Leadership team have not attended ACSL’s NCSS Introductory Sessions for Leaders.	
Recommendation	The College leadership team and School Council plan to attend the ACSL’s NCSS Introductory Sessions for Leaders.	

<b>Agreed Action</b>	1. The College leadership team and School Council will attend the ACSL's NCSS Introductory Sessions for Leaders.
<b>Responsibility</b>	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.
<b>Due date</b>	30 September 2023

Recommendation #6		Priority 2
5.4.2 Annual performance reviews for personnel include child safeguarding responsibilities relevant to their role.		
Details of finding	Findings indicate that not all personnel are part of annual appraisal processes.	
Recommendation	All personnel are appraised annually in respect to their roles. Appraisals should address child safeguarding responsibilities relevant to the role.	
Agreed Action	1. The College will appraise all personnel annually in respect to their roles. 2. Appraisals will address child safeguarding responsibilities relevant to the role.	
Responsibility	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.	
Due date	31 March 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 #7		Priority 2
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.		
Details of finding	The College’s Complaint Policy does not differentiate between an adult making a complaint about an alleged safeguarding incident that occurred as a child, and a child bringing forward a complaint of abuse.	
Recommendation	The College update their policy to reflect the different approaches which will be used when and an adult brings forward a complaint of abuse suffered as a child, and a child who brings forward a complaint of abuse. The College should also develop a policy to manage complaints of peer-on-peer abuse.	
Agreed Action	<ol style="list-style-type: none"><li>1. The College will update their policy to reflect the different approaches which will be used when and an adult brings forward a complaint of abuse suffered as a child, and a child who brings forward a complaint of abuse.</li><li>2. The College will develop a policy to manage complaints of peer- on-peer abuse.</li></ol>	
Responsibility	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.	
Due date	31 March 2023	



### Standard 7: Ongoing education and training

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

Recommendation #8		Priority 2
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>		
Details of finding	Induction training offers comprehensive safeguarding training, however the College’s annual training calendar does not incorporate refresher courses on training in the elements identified in 7.1.2.	
Recommendation	The College’s introduces an annual refresher course that covers these topics.	
Agreed Action	The College’s ongoing teacher training will include refresher training on: <ul style="list-style-type: none"><li>1. Code of Conduct.</li><li>2. Safeguarding risk management.</li><li>3. Child Safeguarding Policy and procedures.</li><li>4. Complaints Handling policy and procedures.</li><li>5. Reporting obligations; and</li><li>6. E-safety training.</li></ul>	
Responsibility	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.	
Due date	31 March 2023	

Recommendation #9		Priority 2
7.3.2. The entity provides training to ensure personnel are aware of information sharing and record keeping policies and procedures.		
Details of finding	See Recommendation #2.	
Recommendation	The College’s record keeping policy is updated and disseminated to personnel.	
Agreed Action	1. The College will update its record keeping policy and disseminate it to personnel.	
Responsibility	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.	
Due date	31 March 2023	

Recommendation #10		Priority 2
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.		
Details of finding	The College’s training calendar does not include a focus on culturally safe environments for Aboriginal or Torres Strait Islander children or culturally and linguistically diverse (CALD) children.	
Recommendation	The College provide distinct and intentional cultural safety training that focuses on Aboriginal and Torres Strait Islander children as well as cultural training for children from CALD backgrounds.	

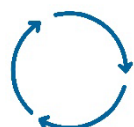
<b>Agreed Action</b>	1. As part of the College's ongoing staff training, it will provide distinct and intentional cultural safety training that focuses on Aboriginal and Torres Strait Islander children as well as cultural training for children from CALD backgrounds.
<b>Responsibility</b>	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.
<b>Due date</b>	31 March 2023



## 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 #11		Priority 2
8.3.1. 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.  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.		
Details of finding	<p>If a high-risk person became a member of the school community, there is no policy in place to manage potential safeguarding risks.</p> <p>The College conduct their arts and technology courses off campus. There are safeguarding risks associated with the venue and movement of students and ACSL recommend that these courses are moved to the College campus.</p>	
Recommendation	<ol style="list-style-type: none"><li>1. The College develop a policy to address the issue of a high-risk individual becoming a member of the school community.</li><li>2. The College develop a plan to move arts and technology courses to the College campus.</li></ol>	
Agreed Action	<p>The College will develop:</p> <ol style="list-style-type: none"><li>1. A policy to address the issue of a high-risk individual becoming a member of the school community.</li><li>2. A plan to move arts and technology courses onto the campus.</li></ol>	
Responsibility	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.	
Due date	31 March 2023	



## Standard 9: Continuous improvement

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



## Standard 10: Policies and procedures support child safety

*Policies and procedures document how the entity is safe for children*



Recommendation #12		Priority 2
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).		
9.2.2 Processes are in place to identify systemic issues or patterns and drive continuous improvement.		
10.1.1 All relevant policies and procedures reference appropriate safeguarding approaches, requirements and responsibilities.		
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.		
Details of finding	These tasks have yet to be fully implemented and will be best addressed through the establishment of a College Safeguarding Committee. Refer to Recommendation #1.	
Recommendation	The Safeguarding Committee which will be established can be allocated responsibility for these tasks.	
Agreed Action	1. The College will establish a Safeguarding Committee and take responsibility for developing and reviewing policies and procedures relevant to safeguarding.	
Responsibility	Fr. Peter Porteous, Provincial Delegate & Ms. Silvana Vicoli, Principal, Servite College.	
Due date	31 March 2023	

## Appendix A – Compliance Assessment Scale

### 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
<b>Not Addressed</b>	<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>
<b>Initial/Ad-Hoc</b>	<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>
<b>Defined and Developed</b>	<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>
<b>Managed and Measurable</b>	<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

### 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

### 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</li> </ul>

	<p>forcing or coercing children to have sex or engage in sexual acts with other children or adults;</p> <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>	<p>means any policies or procedures of the entity that address elements of child safety. For example, but not limited to:</p> <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>	<p>means:</p> <p>A. the diocesan bishop (or archbishop, as appropriate) of a diocese or his administrator from time to time.</p> <p>B. the Australian major superior in respect of religious institutes; or</p> <p>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.</p>
<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".

	<p>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'.</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 prelature's.
<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>Ordinate</b>	means a non-geographical diocese, an example of which is the Catholic Military Ordinate of Australia which is administered by a bishop with the faculties of an Ordinary and thus this organisation is known by the term ordinate.
<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 prelature</b>	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.
<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.