Sisters of Mercy - Parramatta

Safeguarding Audit Report
March 2023

National Catholic
Safeguarding Standards

Report prepared by:

ACSL
AUSTRALIAN CATHOLIC SAFEGUARDING LTD

A safe Church for everyone

Australian Catholic Safeguarding Ltd acknowledges the lifelong trauma of abuse victims, survivors and their families, the failure of the Catholic Church to protect, believe and respond justly to children and vulnerable adults, and the consequent breaches of community trust.

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

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1. Executive Summary

1.1 Context

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

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

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

This audit report includes the results of the assessment against the National Catholic Safeguarding Standards for Sisters of Mercy Parramatta.

1.2 Background

The Sisters of Mercy were founded in Ireland by Catherine McAuley and opened the first ministry in 1827. The first group of Sisters of Mercy to come to Australia arrived in Perth in 1846 from Ireland. From then on, there was a succession of foundations of the Sisters of Mercy in Australia; Parramatta in 1888 was among the last. Parramatta was founded from Callan in County Kilkenny, Ireland.

The foundation from Callan to Parramatta was a direct result of the close relationship between Cardinal Moran and the Sisters of Mercy in Callan. Cardinal Moran had a strong sense of mission, and this spirit was shared by the Sisters at Callan. Mother Clare Dunphy was the leader of a group of nine sisters who responded to the Cardinal's invitation. The Sisters of Mercy Parramatta have offered ministries to children, through education and in retreat work in the Parramatta district and beyond since their arrival in Australia.

The ACSL audit of Sisters of Mercy Parramatta is assessed against the first version of the National Catholic Safeguarding Standards (NCSS). There are 10 NCSS Standards, 49 NCSS Criteria and 111 NCSS Indicators that apply to Sisters of Mercy Parramatta. For further details of the category system and the Indicators which are applicable, refer to the NCSS documentation available on the Audit Framework page of the ACSL website.

Our assessment of Sisters of Mercy Parramatta's implementation of the NCSS is detailed in Section 2 of this report. Our recommendations for improvement, including the Sisters of Mercy - Parramatta's management responses, are included in Section 3 of this report.

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

1.3 Audit Approach

The purpose of the NCSS is to build a culture of shared responsibility for safeguarding and to ensure that policies, practices, and codes of behaviour work together to prevent, detect, and respond appropriately to potential or actual incidents of child abuse.

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 Sisters of Mercy Parramatta and the extent to which it meets the requirements of the NCSS. Our testing procedures included the following:

- interviews, observations and enquiry with the Congregation leadership which incorporates their Safeguarding Committee, sisters and relevant ministerial personnel.
- visit to administration centre.
- review of key safeguarding documents, policies and procedures; and
- assessment of the design and testing of the operation of safeguarding controls implemented by the Congregation.

The audit commenced with a review of the self-assessment completed on the NCSS Self-Assessment Portal and a desktop audit in December 2022. A site visit was conducted on March 9, 2023. Whilst the NCSS Self-Assessment Portal is focused on the second edition of the National Catholic Safeguarding Standards (NCSS) which covers children as well as adults at risk, interviews with key personnel addressed the indicators which are unique to the first iteration of the NCSS which are focused on child safeguarding practices.

The audit included detailed in-person interviews and review of safeguarding documentation in the Art and Family Therapy ministry.

1.4   Overall Audit Findings

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

Our assessment indicates that Sisters of Mercy Parramatta has fully implemented or has substantially progressed in the implementation of 97 (100%) of the 111[2] indicators which are relevant to their operations.

The key findings from the audit are summarised below.

NCSS Standard 1 – Committed leadership, governance and culture

Sisters of Mercy Parramatta has a dedicated (part-time) Safeguarding Coordinator focused on safeguarding and a leadership team which is responsible for overseeing the implementation and monitoring of compliance with the NCSS. There is sufficient time available for the Co-ordinator to support the congregation to implement, support and monitor their safeguarding framework.

A comprehensive suite of safeguarding materials and guidance has been developed and provided to members, personnel and ministries. This includes a detailed Safeguarding Policy, Commitment Statement and Safeguarding Code of Conduct. The Safeguarding Co-ordinator provides support and direction through ongoing visits, formation, and regular phone and electronic communication.

A risk assessment has been completed for the key children's activity, (an Art and Clinical Therapy program). We noted that the risk assessment would benefit from an assessment of the risks of parents/carers who may transport children to appointments. This form of assessment is a stated expectation of the congregation's Management of Child Safeguarding Risk Procedure.

NCSS Standard 2 – Children are safe, informed and participate

The sister who provides the Art and Clinical Therapy ministry has various strategies in place for this children's ministry to engage with families and communities and obtain feedback on its safeguarding practices. This includes providing information on safeguarding in the bulletins and proactive dissemination of safeguarding information and materials by the Therapist and the Safeguarding Co-ordinator.

The children's ministry has disseminated child-friendly complaints materials, as well as information to children on safe and respectful peer relationships.

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[1] Refer Appendix A for definitions of the maturity scale used for the Compliance Assessment.
[2] Of the 111 NCSS Indicators applicable to Category One, 14 of these are not relevant of the Sister of Mercy - Parramatta operations.

NCSS Standard 3 – Partnering with families, carers and communities

Child-friendly posters and statutory pamphlets on reporting safeguarding concerns information are displayed in the children's ministry to inform families, carers and communities about their rights and to provide age-appropriate information for children to raise concerns or complaints.

NCSS Standard 4 – Equity is promoted, and diversity is respected

Sisters of Mercy Parramatta has a strong focus on equity and diversity and has provided fact sheets highlighting safeguarding practices for children in various circumstances and environments. During the audit however, ACSL noted there is no specific information on how to address cultural safety for Aboriginal and Torres Strait Islander children, safety of children with a disability and safety of children from culturally and linguistically diverse backgrounds. ACSL recommends that material specific to these groups is developed in the event such persons are provided with ministry.

NCSS Standard 5 – Robust human resource management

Sisters of Mercy Parramatta has comprehensive recruitment policies and procedures that outline safeguarding requirements in its advertising, vetting and screening of personnel. ACSL commends the sample interview questions which have been developed as part of the screening process for suitably qualified personnel.

Formal performance reviews are conducted for personnel, and knowledge of safeguarding policies are assessed as part of this review. The requirement for personnel to undertake professional/pastoral supervision is implemented by Sisters of Mercy Parramatta.

Sister of Mercy Parramatta has no formal service agreement or secondment arrangements in place for Members who are actively engaged with different Church Authorities and Agencies. ACSL recommends the Leadership team through the Safeguarding Coordinator arrange for service agreements with these groups.

NCSS Standard 6 – Effective complaints management

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

The Counsellor - Professional Standards is responsible for investigating and managing complaints and works closely with the Leader and relevant peers, as well as with an external panel of senior and experienced legal practitioners. Sisters of Mercy Parramatta has no current or history of safeguarding complaints.

The Sisters of Mercy Parramatta Safeguarding Policy contains comprehensive complaints handling procedures. Ministries have been provided with a variety of materials which provide greater detail and information to personnel, and the general community on the processes for reporting, investigating, and managing complaints. Audit procedures indicate that complaints handling procedures are operating effectively. ACSL recommends that Sisters of Mercy Parramatta develops a Risk Assessment proforma which could be used to assess any complaints that are made to the congregation and to assist with allocating resources.

We note the requirement to maintain safeguarding records for a minimum of 50 years is documented in the Privacy Policy and is appropriately implemented.

NCSS Standard 7 – Ongoing education and training

Interviews with Sisters of Mercy Parramatta 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 congregation has provided various forms of safeguarding training to personnel with records of attendance appropriately kept. We note the requirement that personnel are not to commence in child-

related ministry until they have attended the required training is well understood and has been appropriately implemented.

NCSS Standard 8 – Safe physical and online environments

Sisters of Mercy Parramatta Use of Information Technology Policy outlines its expectations around online activity. Online risks are well understood and included in risk assessments for ministry activities where required.

Filtering is in place to block inappropriate online activity for technological devices which are networked with the IT system.

Sisters of Mercy Parramatta has a hire agreement template for hiring out any premise to third parties, which contains the appropriate safeguarding clauses.

ACSL notes the Management of Child Related Safeguarding Risk policy and procedure needs to incorporate a process to manage the risk posed to children of a person attending any of its ministries who is the subject of a substantiated complaint of child sexual abuse or who has been convicted of an offence relating to child sexual abuse.

NCSS Standard 9 – Continuous improvement

Sisters of Mercy Parramatta 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. A Congregational Chapter meeting will occur in March 2023 and these audit findings will be reflected upon and actions developed following the meeting.

NCSS Standard 10 – Policies and procedures support child safety

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

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

National Catholic Safeguarding Standard	# NCSS indicators	Not Relevant to Sisters of Mercy - Parramatta	Assessment of Compliance			
			Managed & measurable	Defined & developed	Initial / Ad hoc	Not addressed
1: Committed leadership, governance & culture	16	2	13	1	-	-
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	10	12	1	-	-
6: Effective complaints management	24	-	22	2	-	-
7: Ongoing training & education	9	-	9	-	-	-
8: Safe physical and online environments	10	-	9	1	-	-
9: Continuous improvement	8	2	6	-	-	-
10: Policies and procedures support child safety	6	-	6	-	-	-
TOTAL	111	14	91	6	-	-
			97 (100%)			

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

There are no Priority 1 (high rated) audit recommendations for the Sisters of Mercy Parramatta.

There are five Priority 3 (low rated) recommendations, which are detailed in Section 3 of this report. Each recommendation also contains the Sisters of Mercy Parramatta response to the audit findings, including associated management actions.

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

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

2. Assessment of NCSS Indicators

Standard 1	Committed leadership, governance and culture

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

Criterion 1.1 - The entity publicly commits to child safeguarding and takes a zero-tolerance approach to child abuse.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.1.1	The entity has a Child Safeguarding Policy that is approved and endorsed by the Church Authority and/or relevant leadership body and is publicly available.	✓			
1.1.2	The entity publishes a Child Safeguarding Commitment Statement which is openly displayed and publicly available.	✓			

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

Criterion 1.2 - A child safeguarding culture is championed and modelled at all levels of the entity from the top down and bottom up.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.2.1	The Church Authority and leaders of the entity create and maintain an entity's culture of safeguarding by: • promoting child safeguarding regularly; • emphasising that child-safeguarding is everyone's responsibility; and • actively monitoring safeguarding compliance and risk management.	✓			
1.2.2	The entity appoints a Safeguarding Committee at the highest level of leadership to oversee the effective ongoing implementation of child safeguarding practices, including the Child Safeguarding Policy and related procedures and practices.	✓			
1.2.3	The entity appoints and promotes the role of Safeguarding Co-ordinator(s), with clearly defined responsibilities for safeguarding children at diocesan, religious institute or ministerial PJP level.	✓			
1.2.4	Personnel understand that child safeguarding is everyone's responsibility and are empowered to provide input on child safeguarding practices.	✓			

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

Criterion 1.3 - Governance arrangements facilitate implementation of a Child Safeguarding Policy across the entity's activities.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.3.1	Governance arrangements are transparent and include safeguarding roles and responsibilities to ensure accountability for safeguarding is clear.	✓			
1.3.2	Where the Church Authority's governance includes countries other than Australia, the entity must apply these Standards taking into account relevant international declarations and local legislation.	Not relevant to current activities			

Observations:

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

Criterion 1.4 - A Code of Conduct provides guidelines for personnel on expected behavioural standards and responsibilities.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.4.1	The Code of Conduct explicitly and equally applies to all personnel and provides guidance on appropriate and expected standards of behaviour of personnel towards children.	✓			
1.4.2	The Code of Conduct is written in accessible language and communicated to personnel, children, families and carers.	✓			
1.4.3	The Code of Conduct takes into account the needs of all children, paying particular attention to Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds and children with particular vulnerabilities, for example, children who can't live at home.	✓			

Observations:

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

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

Observations:

1.5.1 A risk assessment has been completed for the Art and Clinical Therapy Program, the key children's activity. The risk assessment would benefit from an assessment of the risks of parents/carers who may transport children to appointments. Refer recommendation #1.

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

Observations:

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

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.	✓			

Observations:

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).	✓			

Observations:

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.	✓			

Observations:

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.	✓			

Observations:

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

Criterion 3.5 - The entity takes a leadership role in raising community awareness of the dignity and rights of all children.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
3.5.1	Appropriate to the context or setting, the entity actively promotes and/or participates in civic engagement activities/campaigns which promote whole of community awareness of children's rights and child abuse prevention.	✓			

Observations:

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.	✓			

Observations:

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

Criterion 4.2 - All children have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
4.2.1	The entity produces child-friendly material in accessible language and formats that promotes inclusion and informs all children of the support and complaints processes available to them.	✓			

Observations:

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

Criterion 4.3 - The entity pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with a disability, and children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and children of diverse sexuality.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
4.3.1	The entity's Child Safeguarding Policy and practices reflect attitudes and behaviours that respect the human rights of all children and are inclusive and responsive to diverse needs.		✓		

Observations:

4.3.1 ACSL notes the Safeguarding Policy is inclusive of these different groups. However, developing specific safeguarding materials for these groups of people in the children's ministry may assist in attracting persons to the children's ministry. Refer recommendation #2.

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

		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: • that children are valued and respected. • the commitment of the entity to child safeguarding; and • where appropriate to the role, an understanding of children's developmental needs and culturally safe practices.	✓			

Observations:

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

Criterion 5.2 - Relevant personnel (including all seminarians, clergy and religious) have current working with children checks or equivalent background checks.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
5.2.1	The entity has a policy which is implemented that ensures: • personnel have a current working with children check as required by legislation, prior to working with children; and • where a working with children check is not required by legislation, other background checks for personnel are conducted prior to working with children.	✓			
5.2.2	The entity keeps records and monitors the status of working with children checks and/or background checks for all personnel.	✓			

Observations:

Requirements of the Indicator 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.	✓			

Observations:

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

Criterion 5.4 - Ongoing supervision and people management is focused on child safeguarding		Managed & Measurable	Defined & developed	Initial/ Ad-hoc	Not Addressed
5.4.1	Support, mentoring, oversight and professional supervision processes for personnel include child safeguarding.	✓			

| 5.4.2 | Annual performance reviews for personnel include child safeguarding responsibilities relevant to their role. | | ✓ | | |

Observations:

5.4.2. ACSL notes that annual performance reviews are in place. However, the Members who work for other Church Authorities and Agencies do not have secondment agreements in place with these entities. Refer recommendation #3.

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 current activities			
5.5.2	Seminary and initial formation programs have robust screening processes for candidates for religious ministry, including external psychological and psychosexual assessments.	Not relevant to current activities			
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.	Not relevant to current activities			

Observations:

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

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 current activities			
5.6.2	Seminary and initial formation programs ensure promotion of pastoral responses to victims/survivors of sexual abuse.	Not relevant to current activities			
5.6.3	Seminary and initial formation programs are delivered in such a way as to protect against the development and/or reinforcement of clericalist attitudes and behaviours.	Not relevant to current activities			

Observations:
N/A.

Criterion 5.7 - Credentialing and movement of seminarians, clergy and religious is appropriately managed.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
5.7.1	The entity implements a system to assess the credentials and manage movement of all seminarians, clergy and religious moving between different seminaries and Church jurisdictions.	✓			

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

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

Observations:
Not applicable

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	✓			

			Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
6.1.5	Key roles and responsibilities in relation to handling complaints are articulated within the Complaint Handling Policy and procedures.		✓			
6.1.6	The Complaint Handling Policy and procedures differentiate, where appropriate, between a child victim and an adult bringing forward a complaint of abuse suffered as a child.		✓			
6.1.7	A process is in place to record all child abuse complaints, incidents, allegations, disclosures, concerns and referrals. The system must be secure so that confidential information is stored, protected and retained for 50 years.		✓			

Observations:

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

Criterion 6.2 - The entity has a child-focused complaints handling system that is understood by children, families, carers and personnel.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
6.2.1	The complaints handling system prioritises the safety and well-being of children.	✓			
6.2.2	The Complaints Handling Policy and procedures are publicly available in a variety of formats, including age and developmentally appropriate for children, enabling complaints processes to be easily understood.	✓			

Observations:

Requirements of the Indicators 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.	✓			

		Managed & Measurable	Defined & developed	Initial/ Ad-hoc	Not Addressed
6.3.5	Support and care are provided to a child who has experienced or is alleging abuse, and other affected parties.	✓			
6.3.6	Appropriate confidentiality is maintained with due regard for the Australian Privacy Principles and relevant legislation in relation to information sharing in the context of child safeguarding.	✓			
6.3.7	Documented policies and processes empower and support personnel to raise, in good faith, concerns and allegations about unacceptable behaviour towards children by other personnel.	✓			
6.3.8	Where a complaint related to child sexual abuse against a seminarian, clergy or religious is substantiated on the balance of probabilities, with due respect to the rights of individuals, the Church Authority should remove that individual from ministry.	✓			
6.3.9	Where a seminarian, clergy or religious is convicted of an offence relating to child sexual abuse, that individual should be permanently removed from ministry. The Church Authority must take practicable steps to prohibit that individual from holding themselves out as being a person with religious authority and should present a case to the relevant dicastery for dismissal from the clerical state and/or dispensation from vows.	✓			

Observations:

Requirements of the indicators are mostly in place.

6.3.1. ACSL recommends develop a 'Risk Assessment' pro forma to formally identify and record the level of risk upon receiving a complaint. Refer recommendation #4.

Criterion 6.4 - The entity has policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether the law requires reporting, and co-operates with law enforcement.	Managed & Measurable	Defined & developed	Initial/ Ad-hoc	Not Addressed
6.4.1 The Complaints Handling Policy requires that: • concerns and complaints of child abuse occurring within the entity be reported to the appropriate statutory authority/ies, regardless of whether the reporting is mandated; and • personnel cooperate with law enforcement procedures and directives.	✓			

Observations:

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

Criterion 6.5 - Reporting, privacy and employment law obligations are met.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
6.5.1 The Complaints Handling Policy requires that all relevant reporting, privacy and employment law obligations are met.	✓			

Observations:

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

Criterion 6.6 - The Church Authority ensures mechanisms are in place to care for adult complainants.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed

		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
6.6.1	The entity offers appropriate pastoral care to adult complainants, which recognises their unique needs. This should include an offer from the Church Authority to meet the complainant in person.	✓			
6.6.2	The Church Authority facilitates adult complainants' access to appropriately trained personnel whose clearly defined roles are to listen to and represent the pastoral needs of the complainant. This is done in consultation with the complainant.	✓			

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

Criterion 6.7 - The Church Authority ensures mechanisms are in place to monitor and support respondents facing allegations.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
6.7.1	The Church Authority has access to appropriately trained personnel - lay, religious or clergy - whose clearly defined roles are to listen to and represent the pastoral needs of the respondent. This is done in consultation with the respondent.	✓			
6.7.2	The Church Authority has suitable arrangements in place for the monitoring and support of a respondent, where there is a plausible complaint, until (and if) the Church Authority no longer has responsibility for monitoring the respondent.	✓			

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

Standard 7	Ongoing education and training

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

Criterion 7.1 - Personnel are trained and supported to effectively implement the entity's child safeguarding policies and procedures.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
7.1.1	The entity provides regular opportunities to educate/train personnel on its Child Safeguarding Policy and procedures including through induction and refresher safeguarding training (at least every three years).	✓			
7.1.2	The entity's induction and refresher safeguarding training must as a minimum cover: • Code of Conduct. • safeguarding risk management. • Child Safeguarding Policy and procedures. • Complaints Handling Policy and procedures. • reporting obligations. • and e-safety training.	✓			
7.1.3	The entity keeps records of participation to ensure all personnel attend induction and refresher safeguarding training.	✓			

7.1.4	The entity ensures that personnel who have specific child safeguarding responsibilities, such as those appointed to the role of safeguarding co-ordinator and those appointed to the Safeguarding Committee, receive ongoing support and professional development relevant to their role.	✓			

Observations:

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

Criterion 7.2 - Personnel receive training to recognise the nature and indicators of child abuse, including harmful behaviours by a child towards another child.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
7.2.1	The entity provides regular training to relevant personnel which equips them with the knowledge to: • understand the nature and impact of child abuse. • understand the nature, factors, and impact of institutional abuse. • identify risk factors, such as grooming behaviours; and understand, identify, and respond to abusive behaviours by a child towards another child.	✓			

Observations:

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

Criterion 7.3 - Personnel receive training to enable them to respond effectively to child safeguarding risks, concerns, disclosures, and allegations of child abuse.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
7.3.1	The entity provides training to equip relevant personnel to appropriately respond to and support those bringing forward concerns, disclosures and allegations of child abuse.	✓			
7.3.2	The entity provides training to ensure personnel are aware of information sharing and record keeping policies and procedures.	✓			
7.3.3	The entity provides training to ensure personnel are aware of their reporting obligations under state/territory legislative requirements including: • reporting criminal behaviour to police. • mandatory reporting to child protection authorities. • Reportable Conduct Scheme; and reporting to regulatory authorities/government departments	✓			

Observations:

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

Criterion 7.4 - Personnel receive training and information on how to build culturally safe environments for children.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
7.4.1	The entity provides cultural safety training to equip relevant personnel to create culturally safe environments for Aboriginal and Torres Strait Islander children and children from culturally and linguistically diverse backgrounds.	✓			

Observations:

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

Standard 8	Safe physical and online environments

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

Criterion 8.1 - Personnel identify and mitigate risks in online and physical environments without compromising a child's right to privacy, access to information, social connections and learning opportunities.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
8.1.1	The entity's safeguarding risk management plan addresses physical and online risks including risks arising from child to child and adult to child interactions, and the nature of physical spaces.	✓			
8.1.2	The entity's policies require the use of safe online applications for children to learn, communicate and seek help.	✓			
8.1.3	Personnel are proactive in identifying and mitigating physical and online risks to children.	✓			
8.1.4	A policy is documented and implemented that ensures where one-to-one interactions between an adult and child take place, they are conducted in an open or visible space, or within the clear line of sight of another adult. This includes ministries/services such as counselling, one-to-one tuition, the sacrament of reconciliation, coaching, spiritual direction and mentoring.	✓			

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

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

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

Criterion 8.3 - Risk management plans consider risks posed by the entity's settings, activities and physical environments.		Managed & Measurable	Defined & Developed	Initial/Ad-hoc	Not Addressed
8.3.1	The entity assesses safeguarding risks in the physical environments under its control or management including buildings, structures, open spaces, grounds, homes of religious and clergy, and arrangements for live-in carers/caretakers.	✓			

8.3.2	Where an entity becomes aware that a person (other than personnel of that entity) attending any of its services or activities is the subject of a substantiated complaint of child sexual abuse or has been convicted of an offence relating to child sexual abuse, the entity has in place and implements a process for assessing and managing the risks posed to children by that person's ongoing involvement in the service or activity.		✓		

Observations:

8.3.2 - Training should be provided on the "Guidelines for Managing High Risk Individuals" to all key personnel/volunteers who manage or participate in ministry events. Refer to recommendation #5.

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:

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

Criterion 9.2 - The entity analyses concerns and complaints to identify causes and systemic failures to inform continuous improvement.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
9.2.1	Processes are in place to analyse individual incidents or complaints relating to child safeguarding practices and/or failures.	✓			
9.2.2	Processes are in place to identify systemic issues or patterns and drive continuous improvement.	✓			

Observations

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

Criterion 9.3 - The Church Authority reports on the findings of relevant reviews to personnel, children, families, carers and community.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
9.3.1	The Church Authority promotes to all its stakeholders any audit reports relating to the Church Authority, and related entities, published by Catholic Professional Standards Ltd	Not applicable – this is the first audit by ACSL			
9.3.2	The Church Authority reports on findings of relevant reviews of safeguarding policies, procedures and practices to its stakeholders.	Not applicable – no such reviews have been conducted to date			

Observations:

N/A

Standard 10	Policies and procedures support child safety

Policies and procedures document how the entity is safe for children

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

Observations:

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

Criterion 10.2 - Policies and procedures are accessible and easy to understand.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
10.2.1	The entity's policies and procedures relevant to safeguarding are readily available and accessible to all personnel	✓			

Observations:

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

Criterion 10.3 - Best practice policy models and stakeholder consultation inform the development and review of policies and procedures.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
10.3.1	The entity has processes in place to monitor adherence to policies and procedures relevant to safeguarding.	✓			

10.3.2	The entity has processes in place to develop and review its policies and procedures relevant to safeguarding. These processes include consulting with and incorporating advice from experts, children, families, carers and communities.	✓			

Observations:

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

Criterion 10.4 - The Church Authority and leaders model compliance with policies and procedures.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
10.4.1	The Church Authority and leaders promote and enact all policies and procedures relevant to safeguarding.	✓			

Observations:

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

Criterion 10.5 - Personnel understand and implement the policies and procedures.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
10.5.1	The entity encourages regular discussion and feedback from personnel on their understanding and practical implementation of policies and procedures.	✓			

Observations:

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

3.   Detailed Findings

Standard 1: Committed leadership and Culture

Recommendation #1	
Criterion 1.5 – The entity has risk management strategies focusing on preventing, identifying and mitigating risks to children.	**Priority 3**

Details of finding	The following points were noted: 1. A comprehensive suite of safeguarding materials and guidance has been developed and provided to members, personnel and ministries. 2. A risk assessment has been completed for the key children's activity. 3. The risk assessment would benefit from an assessment of the risks of parents/carers who may transport children to appointments. 4. This form of assessment is a stated expectation of the congregation's Management of Child Safeguarding Risk Procedure.
Recommendation	1. The current Risk Assessment for the children's ministry is updated to assess the risks of parents/carers who may transport children to appointments.
Agreed Action	Sisters of Mercy Parramatta has updated the risk assessment to include parents/carers who may transport children to appointments
Responsibility	Safeguarding Coordinator
Due date	31 December 2023

Standard 4: Equity is promoted and diversity is respected

Recommendation #2	
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.	**Priority 2**

Details of finding	The following points were noted: 1. The safeguarding framework has a strong focus on equity and diversity. 2. There is no specific safeguarding information on how to address cultural safety for Aboriginal and Torres Strait Islander children, safety of children with a disability and safety of children from culturally and linguistically diverse backgrounds.
Recommendation	1. Safeguarding material specific to these groups is developed in the event such persons are provided with ministry.
Agreed Action	Sisters of Mercy Parramatta will develop specific safeguarding material relevant to children from Aboriginal and Torres Strait backgrounds, children with a disability and children from culturally and linguistically diverse backgrounds.
Responsibility	Safeguarding Coordinator
Due date	31 December 2023

Standard 5: Robust Human Resource Management

Recommendation #3		Priority 3
Criterion 5.3 - Personnel receive an appropriate induction and are aware of child safeguarding responsibilities, including reporting obligations.		
Criterion 5.4 - Ongoing supervision and people management is focused on child safeguarding.		
Details of finding	The following points were noted: 1. There are comprehensive recruitment policies and procedures that outline safeguarding requirements in its advertising, vetting and screening of personnel. 2. There are no formal service agreement or secondment arrangements in place for Members who are actively engaged with different Church Authorities and Agencies.	
Recommendation	1. Service Agreements for Sisters in external ministries are developed and confirmed.	
Agreed Action	Sisters of Mercy Parramatta will develop service agreements and secondment arrangements for Members who are actively engaged with different Church Authorities and Agencies.	
Responsibility	Safeguarding Coordinator	
Due date	31 March 2024	

Standard 6: Effective Complaint Management

Recommendation #4		Priority 3
Criterion 6.3 - Complaints are taken seriously and responded to promptly and thoroughly.		
Details of finding	1. The Sisters of Mercy – Parramatta have not received any complaints. Interviews with personnel indicate that any complaint will be treated seriously. 2. If the congregation were to receive a complaint, following a 'Risk Assessment' proforma will provide objectivity to identifying risks and strategies that can appropriately respond to the complaint.	
Recommendation	1. ACSL recommends the Sisters of Mercy – Parramatta develop a 'Risk Assessment' pro forma to formally identify and record the level of risk upon receiving a complaint.	
Agreed Action	Sisters of Mercy Parramatta will develop a proforma to identify informally and record the level of risk upon receiving a complaint.	
Responsibility	Safeguarding Coordinator	
Due date	31 December 2023	

Standard 8 Safe physical and online environment

Recommendation #5	
Criterion 8.3 - Risk management plans consider risks posed by the entity's settings, activities and physical environments.	**Priority 3**

Details of finding	The following points were noted: 1. The Use of Information Technology policy and processes outlines its expectations around online activity. 2. Online risks are well understood and included in risk assessments for ministries activities where required. 3. Filtering is in place to block inappropriate online activity for technological devices which are networked with the IT system. 4. The Management of Child Related Safeguarding Risk policy and procedure does not incorporate a process to manage a person (other than personnel of that entity) who attends any of its ministries who is the subject of a substantiated complaint of child sexual abuse or has been convicted of an offence relating to child sexual abuse.
Recommendation	1. The Management of Child Related Safeguarding Risk policy and procedure needs to incorporate a process to manage a person (other than personnel of that entity) who attends any of its ministries who is the subject of a substantiated complaint of child sexual abuse or has been convicted of an offence relating to child sexual abuse.
Agreed Action	Sisters of Mercy Parramatta will review its Management of Child Related Safeguarding Risk Policy to incorporate a process to manage a person (other than personnel of Sisters of Mercy Parramatta) who attends any of its ministries who is the subject of a substantiated complaint of child sexual abuse or has been convicted of an offense relating to child sexual abuse.
Responsibility	Safeguarding Coordinator
Due date	31 December 2023

Appendix A

COMPLIANCE ASSESSMENT SCALE

The compliance assessment of the entity's performance against each indicator will be determined using a four-point scale, as follows:

	General	Processes	People/Resources
Not Addressed	• The entity has not addressed the required Indicator or is unable to demonstrate that the requirements of the indicator are in place and/or are operating effectively and continuously.	• Processes are non-existent. • Processes exist however the specific requirements of the indicator have not been addressed.	• No resources have been assigned.

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

Defined and Developed	• The entity has addressed the indicator and is in the process of implementing the requirements across the entity.	• Relevant processes have been defined and developed, however are yet to be rolled out across the full operations of the entity.	• Resources have been assigned and responsibilities defined, however there is no formal training or communication of standard procedures, and it is unlikely that deviations will be detected.
Managed and Measurable	• The entity has demonstrated that Indicator requirements are formally embedded and are operating effectively and continuously.	• Relevant processes are integrated and coordinated, including remote operations and activities.	• Personnel have been trained to detect and report on deviations or break downs in processes. • Resources have been assigned to monitor and address non-compliance.

Appendix B

AUDIT FINDING PRIORITIES

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

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

Appendix C

The definitions of terms used in the National Catholic Safeguarding Standards consider Australian State, Territory and federal laws and relevant regulations, canon law, information from the Holy See, the Royal Commission into Institutional Responses to Child Sexual Abuse, the National Principles for Child Safe Organisations and the Glossary on Sexual Exploitation and Abuse published by the United Nations in 2017.

The glossary does not have any legal force and is meant only to serve as a reference tool for the National Catholic Safeguarding Standards. All terms and definitions are to be read in the context of these Standards alone.

Accessible language	means information is provided in multiple formats for individuals with different levels of English literacy and proficiency, modes of communication, languages and cognitive abilities.
Allegation	means a complaint, still to be verified, claiming or asserting that someone has committed an act of abuse against a child. The term is used interchangeably and in combination with "complaint".
Australian Catholic Bishops Conference	means the national episcopal conference of the Catholic bishops of Australia. It is the instrumentality used by the Australian Catholic bishops to act nationally and address issues of national significance.
Bishop	means a diocesan bishop and archbishop and the ordinary of an ordinariate in the Latin Church and an eparch in the Eastern Churches.
Canon law	means the revised Code of Canon Law promulgated by His Holiness Pope John Paul II in 1983 and the Code of Canons of the Eastern Churches as promulgated in 1990 and any other universal or particular legislation promulgated by the competent ecclesiastical authority.
Canonical Steward	means the person(s) or other entity canonically responsible for the Catholic Entity.
Catholic Religious Australia	means the public name of the Australian Conference of Leaders of Religious Institutes (ACLRI). It is the peak body for leaders of Religious Institutes and Societies of Apostolic Life resident in Australia.
Child/ren	means individuals under 18 years of age.
Child abuse	there are different legal definitions of child abuse in Australia. Most commonly, the categories of child abuse include sexual, physical, psychological, neglect, ill-treatment, exploitation and exposure to family violence. The following provides general definitions only. For specific legal definitions related to your state or territory please go to: https://aifs.gov.au/cfca/publications/cfca-resource-sheet/reporting-child-abuse-and-neglect Child abuse, when referenced throughout the National Catholic Safeguarding Standards, includes: • physical abuse refers to any non-accidental physically aggressive act towards a child. Physical abuse may be intentional or may be the inadvertent result of physical punishment. Physically abusive behaviours include shoving, hitting, slapping, shaking, throwing, punching, biting, burning and kicking; • sexual abuse refers to a person who uses power, force or authority to involve a child or young person in any form of unwanted or illegal sexual activity. This can involve touching or no contact at all. This may take the form of taking sexually explicit photographs or videos of children, forcing children to watch or take part in sexual acts and forcing or coercing children to have sex or engage in sexual acts with other children or adults;

	- neglect refers to a failure by a caregiver to provide the basic requirements for meeting the physical and emotional developmental needs of a child. Physically neglectful behaviours include a failure to provide adequate food, shelter, clothing, supervision, hygiene or medical attention; - psychological abuse refers to inappropriate verbal or symbolic acts and a failure to provide adequate non-physical nurture or emotional availability. Psychologically abusive behaviours include rejecting, ignoring, isolating, terrorising, corrupting, verbal abuse and belittlement; - exposure to family violence is generally considered to be a form of psychologically abusive behaviour, where a child is present (hearing or seeing) while a parent or sibling is subjected to physical abuse, sexual abuse or psychological maltreatment, or is visually exposed to the damage caused to persons or property by a family member's violent behaviour; and - grooming refers to a pattern of behaviour aimed at engaging a child as a precursor to sexual abuse. It includes establishing a 'special' friendship/ relationship with the child. Grooming can include the conditioning of parents and other adults to think that the relationship with the child is 'normal' and positive. The process can take as little as a few days or as long as months or even years.
Child Safeguarding Commitment Statement	means a commitment statement describing an entity's commitment to keep children safe from harm. It informs the entity's culture with respect to child safeguarding.
Child safeguarding policies and procedures	means any policies or procedures of the entity that address elements of child safety. For example, but not limited to: - recruitment; - risk management; - complaints handling; and - acceptable use (information and communication technology).
Church Authority	means: A. the diocesan bishop (or archbishop, as appropriate) of a diocese or his administrator from time to time; B. the Australian major superior in respect of religious institutes; or C. the canonical steward in relation to a particular Catholic entity in respect of other Catholic entities not referred to in (a) or (b) above.
Civic engagement	means individual and collective actions designed to identify and address issues of public concern. Civic engagement includes citizens working together to make a change or difference in the community. The goal of civic engagement is to address public concerns and promote the quality of the community.
Clergy	means the body of those ordained in sacred ministry in the Church. They are either deacons, priests or bishops.
Cleric	means a member of the clergy.
Clericalist/ism	means an attitude toward clergy/religious characterised by an excessive deference and an assumption of their moral superiority. Pope Francis has said of clericalism that it occurs when "clerics feel they are superior, [and when] they are far from the people." He goes on to say that clericalism can be "fostered by priests themselves or by lay persons". When fostered by priests it may be demonstrated in an attitude where clerics see themselves as self-sufficient, superior to and separate from accountabilities of the world beyond the Church. When fostered by lay

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

Leaders	means personnel who are responsible for important governance decisions within a Church entity and/or who lead and coordinate Church improvement initiatives.
Leaders of Religious Institutes	means the person acting in that canonical role (by whatever name) from time to time.
Mentor	means an experienced and trusted advisor or a person who gives a younger or less experienced person help and advice over a period of time.
Ministerial PJP	means a public juridic person established by a religious institute which provides sponsorship and lay leadership for ministries of the religious institute, to ensure their continuation as works of the Catholic Church. The establishing authority for these entities is varied – some ministerial PJPs have been established by the Holy See through the Congregation for Institutes of Consecrated Life and Societies of Apostolic Life and are known as PJPs of pontifical right, others have been authorised by diocesan or provincial bishops. Canon law defines a public juridic person (PJP) as 'an aggregate of persons or things constituted by the competent ecclesial authority to fulfil a proper function given them in view of the common good' [Can. 114 §1].
Ministry	means any activity within, or delivered by, an entity that is designed to carry out the good works of the Catholic Church.
Neglect	refer to 'child abuse'.
Offender	means a person who has admitted abuse or whose responsibility for abuse has been determined by a court of law (criminal or civil), statutory or Church procedure.
Ordinariate	means a non-geographical diocese, an example of which is the Catholic Military Ordinariate of Australia which is administered by a bishop with the faculties of an Ordinary and thus this organisation is known by the term ordinariate.
Overseas clergy and religious	means any cleric or member of a religious institute who is specifically recruited from overseas by a Church Authority or entity.
Personal prelature	means a canonical structure of the Catholic Church which comprises a prelate, clergy and laity who undertake specific pastoral activities. The first personal prelature is Opus Dei.
Personnel	means a cleric, member of a religious institute or other person who is employed by the entity or engaged on a contract, subcontract, voluntary or unpaid basis.
Physical abuse	refer to 'child abuse'.
Position description	means a document which details the role, responsibilities and expectations of a role within an entity and outlines reporting lines.
Professional/pastoral supervision	means a forum for reflection and learning, an interactive dialogue between at least two people, one of whom is professionally trained as a supervisor. The dialogue shapes a process of review, reflection, critique and replenishment for personnel. Supervision is a professional activity in which personnel are engaged regardless of experience or qualification. Supervision assists personnel in their accountabilities for professional standards (including in relation to maintenance of professional boundaries), defined competencies for their role and understanding and implementation of organisational policy and procedures. For clerics and religious, professional/pastoral supervision assists in the maintenance of boundaries of the pastoral relationship and enhances the quality of their ministry. A cleric/ religious' commitment to conscious and critical reflection on their ministry and ministry experiences is recognised as being important for the

	wellbeing of the cleric/religious, the people with whom they exercise ministry, the wider Church and the community.
Protective behaviours program	means an age-appropriate structured education program to equip children and young people with the skills and knowledge to enhance their personal safety.
Psychological abuse	refer to 'child abuse'.
Religious Institute	means an entity within the Catholic Church whose members commit themselves through religious vows to lead a life of poverty, chastity and obedience. Societies of apostolic life resemble religious institutes in that their members also live a life in common. They do not take religious vows but live out the apostolic purpose of the group. In these Standards, the term 'religious institutes' is used to include religious institutes, societies of apostolic life and secular institutes.
Respondent	means a person against whom a complaint is made.
Safeguarding	means measures to protect the safety, human rights and well-being of individuals, which allow people – in this context children – to live free from abuse, harm and neglect.
Safeguarding Committee	means a committee established to advise and support the Church Authority on all matters relating to safeguarding, including the development and implementation of a Safeguarding Implementation Plan and coordination of annual self-audits at a local level. Committee members need relevant and varied professional expertise in relation to, but not limited to safeguarding, child protection, organisational culture and structure, policy development, and need to include lay women and men.
Safeguarding Co-ordinator	means an individual who champions safeguarding and co-ordinates the implementation of the National Catholic Safeguarding Standards within an entity.
Safeguarding Implementation Plan	means a documented plan which articulates actions to be taken across the entity to ensure safeguarding practices are in place. It includes actions, strategies, responsibilities and delegations and tracks review and progress. It is overseen by the Safeguarding Committee.
Seminary	means a centre for the formation and education of students preparing for ordination.
Sexual abuse	refer to 'child abuse'.
Spiritual abuse	means the abuse of a child that is perpetrated by an individual in a position of authority and trust within the Church, supposedly in the name of God. It can cause a child to have lifelong loss of faith and/or feel distanced from the Church.
Substantiated complaint	means allegations proven to be true or supported with evidence.
Third parties	means any individual, group or organisation outside the entity who either contract services and facilities to or from the entity. For example, groups hiring Church facilities for private or public use (for example birthday parties, men's sheds, exercise groups), companies contracted to provide design and print work for an entity, and consultants.
Working with children check	is a generic term used in the Standards to denote the statutory screening requirement for people who work or volunteer in child-related work. There is no single national framework setting out requirements for 'working with children' checks. Each state or territory in Australia has its own name, procedures and differences in scope regarding what this type of check entails. They are one part of a Church entity's recruitment, selection and screening processes.