

Sisters of St. John of God

Safeguarding Audit Report March 2023

National Catholic Safeguarding Standards



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

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 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 Sisters of St. John of God.

1.2 Background

In 1895 the Sisters of St John of God (SSJG) responded to a request from Bishop Matthew Gibney of Western Australia, to minister to the sick and attend to the pastoral and social needs of the people in his diocese. Eight Sisters responded to that call for help, arriving in Perth on 25th November 1895.

Over the years the original Sisters were joined by other women from both Ireland and Australia, so that the number of Sisters gradually increased. By 1965 there were 328 Sisters in Australia, ministering primarily in healthcare, education and pastoral care. In response to needs and requests, the Sisters in Australia established and operated ministries in Western Australia, the Kimberley, Victoria, New South Wales, New Zealand, Ireland and Pakistan.

The SSJG have two ministries in Western Australia. The first is the Sisters of St. John of God Heritage Centre in Broome, a place of sharing of the social history related to SSJG and Aboriginal People of the Kimberley. The second ministry operated by SSJG in Western Australia is a retreat centre ministry in Safety Bay, Perth, a space for contemplation where individuals and groups can spend time together. In Victoria, The Open-Door ministry offers a safe space for people to explore contemplative spirituality in an environment that nurtures questions of faith and practice without fear of judgement.

SSJG has been assessed as a "Limited Audit" Church entity for application of the NCSS (Working with Children and Adults at Risk). There are 5 NCSS Standards, 29 NCSS Criteria and 76 NCSS indicators that apply to Limited Audited entities. For further details of the NCSS risk-based framework and the standards applicable to each entity type, visit the Assessment and Certification page of the ACSL website.

Our assessment of how SSJG has implemented the National Catholic Safeguarding Standards is detailed in Section 2 of this report. Our recommendations for improvement, including SSJG 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 or adult abuse.

In this context, the audit processes we have undertaken are intended to provide reasonable assurance that safeguarding controls have been designed appropriately and are operating effectively.

Therefore, this report provides a point-in-time assessment of the safeguarding practices implemented by Sisters of St. John of God (SSJG) the extent to which it meets the requirements of the NCSS.

Our testing procedures included the following:

- interviews, observations and enquiry with the SSJG Leadership Team, individual SSJG members, ministries and relevant personnel.
- review of key safeguarding documents, policies, and procedures; and
- assessment of the design and testing of the operation of safeguarding controls implemented by SSJG.

This audit was commenced in July 2022 with a site visit and interviews with relevant personnel; were held in February 2023 when both SSJG and ACSL were able to meet the audit schedule requirements. As such, the review of SSJG documents, assessment of policies and procedures, discussions and interviews with personnel were largely conducted remotely, using email, video conferencing and other electronic communication methods.

The audit included detailed safeguarding interviews and review of documentation including procedures in place around the governance and management of the program ministries.

As part of this audit, ACSL also had discussions with SSJG to determine how the activities of their ministries, including their safeguarding practices, would be subject to any existing regulatory requirements and external accreditations. SSJG does not initiate programs with children on the program locations premises. If children are at the retreat centre, they are supervised by school personnel that have responsibility for their welfare. SSJG requests that retreat groups and partners adhere to all their SSJG policies.

The findings in this report relate to the ministries of the SSJG; these ministries are not subject to external accreditation processes.

1.4 Overall Audit Findings

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

Our assessment indicates that SSJG has fully implemented or has substantially progressed in the implementation of 62^2 (100%) 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 SSJG Management Committee incorporates the Safeguarding committee, and the Committee has been meeting since 1909 and has always included an awareness of child welfare. The Committee takes responsibility for all ministries throughout the SSJG Community. The role and scope of this Committee would benefit with the development of a Management Committee Charter. Additionally, the current members are aware of their role and responsibility given their knowledge and longevity. However, ACSL

¹ Refer Appendix A for definitions of the maturity scale used for the Compliance Assessment.

² Of the 76 NCSS Indicators applicable to Limited Review, 14 of these are not relevant to Sisters of St. John of God's operations

recommends that a formal position description is developed and provided to any new members who join the Committee.

A comprehensive suite of safeguarding materials and guidance has been developed and provided to Sisters, staff and volunteers. This includes a detailed Safeguarding Policy for Children and Adults at Risk, Commitment Statement and Code of Conduct.

The SSJG has a strong framework around risk management.

NCSS Standard 5 – Robust human resource management

SSJG has comprehensive recruitment policies and procedures that outline safeguarding requirements in its advertising, vetting and screening of personnel. A monitoring system is also in place to ensure any clergy who direct retreats at the Retreat Centre, Safety Bay are of good standing to undertake this ministry. The Induction and Recruitment Policy/ procedures clearly express zero tolerance of child abuse. The Register of WWCC and other documentation including the member exemption table is in keeping with requirements. The requirement for personnel to undertake professional/pastoral Supervision is articulated in the Safeguarding Policy. SSJG personnel also have access to an Employment Assistance Program.

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 SSJG Safeguarding Policy contains comprehensive complaints handling procedures, and the Sisters have provided 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, and that no complaints have been made against SSJG.

ACSL recommends that a series of 'flash cards' are developed and easily accessible for personnel to remind them of the complaints process in the event they may need to use the process. Further, ACSL recommends that a Complaints 'Flow-Chart' which simply and clearly outlines the complaint process is developed and displayed in the ministries.

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

NCSS Standard 7 - Ongoing education and training

Interviews with SSJG staff indicate a strong understanding of the requirements for child and adults at risk safeguarding, including knowledge of the appropriate response should a complaint or concern be raised. In discussions with personnel, many staff indicated a desire to attend ACSL's updated NCSS Introductory Session for Leaders training.

SSJG has provided safeguarding training to the Sisters and staff, with records of attendance appropriately kept. There is strong awareness and knowledge of safeguarding practices across the SSJG community.

NCSS Standard 8 – Safe physical and online environments

SSJG has a strong policy outlining its expectations around online activity and online risks are well understood. SSJG has procedures in place to manage contractors conducting work on their property. Internet safety filters apply to all SSJG environments. ACSL recommends that the generic 'Hire Agreement Form' is listed on the website under the new 'Safeguarding' tab and on the Heritage Centre webpage. The Open Door Centre does not hire out their facilities to third party contractors and if they were to offer this facility the Centre will emulate a 'Hire Agreement Form' based on the Safety Bay document.

Table 1: shows the overall assessment for each of the relevant Standards.

Table 1:

	tors lit)	it to John	Asse	essment o	f Complia	nce
National Catholic Safeguarding Standard	# NCSS Indicators (Limited Audit)	Not Relevant to Sisters of St. John of God	Managed & measurable	Defined & developed	Initial / Ad hoc	Not addressed
1: Committed leadership, governance & culture	17	1	14	2	-	-
5: Robust human resource management	21	12	9	-	-	-
6: Effective complaints management	19	1	16	2	-	-
7: Ongoing training & education	11	-	11	-	-	-
8: Safe physical and online environments	8	-	7	1	-	-
TOTAL	76	14	57	5	-	-
	62	62		00%)	0 (0)%)

Audit recommendations are classified according to priority and urgency for remediation³

There are no Priority 1 (high rated) audit recommendations for Sisters of Saint John of God. There are 5 Priority 2 (medium rated) recommendation which are detailed in Section 3 of this report. These recommendations also contain SSJG's response to the audit finding, including management actions.

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

 $^{^{\}rm 3}$ Refer Appendix B for definitions of the Priority ratings used for audit recommendations.

2. Assessment of Compliance with NCSS Indicators

2.	Assessment of	Compliance with	1 NCSS I	ndicato	rs		
Standa	rd 1	Committed leadership, gove	rnance and cu	ılture			
The saj	feguarding of children an	d adults is embedded in the er	ntity's leaders	hip, governar	nce and cultu	re	
	on 1.1 - There is a public co kes a zero-tolerance appro	ommitment to safeguarding pach to abuse.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed	
1.1.1		approved and endorsed by the elevant leadership body and is	\				
1.1.2	The Safeguarding Commit widely displayed and made	ment Statement is published, is publicly available.		✓			
1.1.2 AC	ments of the indicators are in	eguarding Statement and other re o make it easier to access safegual					
champ	on 1.2 - A culture of safegui ioned and modelled at all ity from the top down and		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed	
1.2.1	 by the Church Authority ar promoting safeguardi everyone; emphasising that safe everyone's responsibility 	ng, and the dignity and rights of guarding children and adults is	√				
1.2.2	level of leadership to overs	is appointed at the highest see the effective ongoing ording practices, policies and	~				
1.2.3	A Safeguarding Co-ordinate defined safeguarding roles	or(s) is appointed with clearly and responsibilities.	✓				
1.2.4		good safeguarding practices are nd are encouraged to contribute uarding practices.					
Observa Require		n place. No recommendations for	improvement n	oted.			
	_	gements facilitate ling Policy across the entity's	Managed & Measurable	Defined &1.2 Developed	Initial/ Ad-hoc	Not Addressed	
1.3.1	safeguarding roles and res	are transparent and include consibilities to ensure that guarding of children and adults		✓			
1.3.2		alia, these Standards are applied ring cultural differences and	Not relevant to current operations				

Requirements of the indicators are in place.

1.3.1 ACSL note there are clear governance and accountable governance arrangements in place for the general business of the Committee. ACSL recommends that a formal Management Committee Charter for Committee members is developed which include a focus on safeguarding for greater accountability. Refer to recommendation#2.

	on 1.4 - The entity's Code of Conduct sets clear oural standards towards children and adults.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.4.1	The Code of Conduct is explicit and inclusive of all personnel and provides guidance on appropriate and expected standards of behaviour.	√			
1.4.2	The Code of Conduct is written in accessible language and communicated to personnel, children, adults, families and carers.	√			
1.4.3	The Code of Conduct considers the needs of all children and adults at risk, paying particular attention to • Aboriginal and Torres Strait Islander people; • individuals who are elderly, are living with disability, are suffering from an illness, or who are 'at risk'; • individuals from culturally and linguistically diverse (CALD) backgrounds; • children in out of home care, or those who are homeless; and • children and adults of diverse sexuality.	✓			
1.4.4	The Code of Conduct outlines the importance of how power imbalances can occur in ministries and services.	✓			

Observations:

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

Criterion 1.5 - The entity's risk management plan focuses on preventing, identifying, and mitigating safeguarding risks to children and adults.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.5.1	The Risk Management Plan considers the needs of children and adults with diminished capacity, and how and when adults at risk make informed choices (dignity of risk).	√			
1.5.2	The Risk Management Plan incorporates procedures to assess, evaluate, review, and oversee safeguarding of children and adults at risk within its ministry and/or service.	√			
1.5.3	There is a documented program to regularly identify, monitor, report, and review risks.	✓			

Observations:

Criterion 1.6 - Personnel understand their obligations on information sharing and record keeping for safeguarding and professional standards.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
1.6.1	Information sharing and record keeping policies and procedures are documented and communicated to personnel.	√			
1.6.2	Information sharing and record keeping policies and procedures align with best practice.	√			

Standa	rd 5	Robust human resource mar	nagement			
People	working with children a	nd adults are suitable and supp	oorted to refle	ct safeguardi	ng values in	practice
	on 5.1 - A strong commitr sins an entity's recruitme		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
5.1.1		uarding and zero tolerance plicit in advertising, screening, onnel.	√			
5.1.2	Recruitment and screenin fully documented.	g procedures and processes are	✓			
5.1.3	with children and/or adul	the expected level of contact ts at risk and appropriate procedures are implemented.	√			
Observa Require		in place. No recommendations for	improvement n	oted.		
examp	on 5.2 - Personnel have co le, working with children ound checks relevant to t	checks) and/or equivalent	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
5.2.1	All personnel are required clearance (as relevant to t	I to have a background check and their role).	✓			
5.2.2	working with children che	personnel must have a current ock (or working with vulnerable S Worker Screening Check prior or adults at risk.	\			
5.2.3	Records of all checks are accordance with legislation	maintained and monitored in on, for all personnel.	√			
	ments of the indicators are	in place. No recommendations for	improvement n			
are aw	· · · · · · · · · · · · · · · · · · ·	responsibilities including	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
5.3.1	All personnel participate i program, which occurs as commencement.	n a safeguarding induction soon as possible after	✓			
5.3.2		eir leadership team undertake guarding Standards Introductory	√			
Observa Require		in place. No recommendations for	improvement n	oted.		
	on 5.4 - Ongoing supervises an emphasis on safegu	ion and people management arding responsibilities.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
5.4.1	Professional supervision, performance reviews for paragraphs as a feguarding responsibility	personnel include a focus on				

Standard 6

Effective complaints management

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

Criterion 6.1 – The entity's Complaints Handling Policy outlines 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	Policies and procedures address mandatory reporting obligations.	√			
	There are clear procedures that provide step-by-step guidance on the response and what action to taken for different types of complaints, including:				
	 breaches of Codes of Conduct; 				
6.1.2	 disclosures, allegations or concerns of current abuse of a child; 		✓		
	 an adult brining forward a complaint of abuse suffered as a child; and 				
	 an adult brining forward a complaint of current or past abuse experienced as an adult. 				
6.1.3	The Complaints Handling Policy outlines how perceived or actual conflict of interest are managed.	✓			
6.1.4	The Complaints Handling Policy acknowledges power imbalances may exist between the complainant and respondent and has strategies in place to address this.	√			
6.1.5	The Complaint Handling Policy spells out who has responsibilities in relation to handling complaints and when procedures are enacted.	√			
6.1.6	All abuse complaints, incidents, allegations, disclosures, concerns and referrals are recorded, and confidential information is stored, protected and retained according to the Privacy Act, and for 50 years.	√			

Observations:

Requirements of the indicator are in place.

6.1.2 ACSL recommends that complaint process materials (posters) 'flow-charts' are developed and displayed in the ministries. Refer <u>recommendation #3</u>.

by child	on 6.2 - The Complaint Handling Policy is understood dren, adults, families, carers, and personnel, and s on the rights of children and adults at risk.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
6.2.1	The Complaints Handling Policy and procedures demonstrates how the safety and wellbeing of children and adults at risk are prioritised.	✓			

Observations:

	on 6.3 - Complaints are taken seriously and responded nptly and thoroughly.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
6.3.1	The Complaints Handling Policy is aligned and operates in conjunction, with the Code of Conduct, HR and other policies.	✓			

6.3.2	The Complaints Handling Policy commits to an initial risk assessment if a complaint of abuse is received, to identify and minimise any risk to children and adults. Ongoing risk assessments are carried out throughout investigation processes.		✓			
6.3.3	Complainants are responded to promptly and kept informed as to the progress of dealing with their complaint.	No complaints have ever been received				
6.3.4	Trauma-informed and victim-centred support and care is offered to any child or adult who has experienced or is alleging abuse.	Policy provides details of how support and care would be provided				
6.3.5	Sharing information relating to complaints adheres to the Australian Privacy Principles and relevant legislation.	√				
6.3.6	The Complaint Handling Policy and procedure empower and support personnel to raise, in good faith, concerns and allegations about unacceptable behaviour towards children and adults by other personnel.	✓				
6.3.7.	Where a complaint related to the sexual abuse of a child or adult against a clergy or religious is substantiated under a civil standard, the Church Authority undertakes a risk management process to determine the appropriate action, in keeping with Church protocols.	Documented in policy				
6.3.8	Where a cleric or religious is convicted of a canonical offence relating to sexual abuse, the respondent is to be prohibited from the exercise of ministry until such time as the process for imposing a penalty is completed by the relevant dicastery.	Not applicable				

Requirements of the indicators are in place.

6.3.2. ACSL recommends SSJG develop a 'Risk Assessment' pro forma to formally identify and record the level of risk upon receiving a complaint. ACSL recommends that a set of 'flash cards' are developed and easily accessible to personnel in the event the complaint process needs to be implemented Refer <u>recommendation #4</u>.

process authori	on 6.4 - The Complaints Handling Policy includes the sof reporting complaints and concerns to relevant ities, requiring cooperation with any statutory or ctual processes.	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;	√			
0.4.1	 concerns and/or complaints of serious offences against adults be reported to statutory authorities; and 				
	 personnel cooperate with law enforcement procedures and directives. 				

Observations:

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

Criterion 6.5 - The Church Authority ensures mechanisms are in place to support complainants of child and adult sexual abuse.		Managed &	Defined &	Initial/	Not
		Measurable	Developed	Ad-hoc	Addressed
6.5.1 Appropriate pastoral care is provided to complainants.		√			

Observations:

	on 6.6 - The Church Authority ensures respondents allegations are supported and monitored.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed	
6.6.1	Appropriately trained personnel are engaged in consultation with the respondent to counsel and represent the pastoral needs of the respondent.					
6.6.2	Arrangements are in place to monitor, supervise and support a respondent, where there is a complaint, until (and if) the Church Authority no longer has this responsibility.	Documented in Policy				
Observa	Observations:					

Standa	rd 7	Ongoing education and train	ing			
	nel are equipped with kn ation, ongoing education	owledge, skills and awareness and training	to keep child	ren and adult	s safe throug	ıh
	on 7.1 - Personnel are traively implement the safegulares.	• •	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
7.1.1	Personnel are provided re safeguarding policies and	gular education and training on procedures.	✓			
7.1.2	The entity's induction and Children and Adults trainin Code of Conduct; safeguarding risk manage Safeguarding Policy and Complaints Handling Policy Reporting obligations; as e-safety training.	gement; procedures; licy and procedures;	✓			
7.1.3		ensure all personnel attend ticipate in refresher safeguarding e years.	√			
7.1.4		safeguarding responsibilities nd professional development	√			
Observa Require		n place. No recommendations for	improvement i	noted.		
Criterion 7.2 - Personnel are supported to recognise the nature and indicators of child abuse, including harmful behaviours by a child towards another child. Managed & Defined & Initial/ Measurable Developed Ad-hoc			Not Addressed			
7.2.1.		orograms include materials may place children at risk of dge 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. on 7.3 - Personnel are supported to recognise the that contribute to adult abuse, with a focus on adults 	Managed &	Defined &	Initial/	Not
at risk.	and continuate to addit abase, with a focus off addits	Measurable	Developed	Ad-hoc	Addressed
7.3.1	Education and training programs include materials addressing factors that may place adults at risk of abuse, building knowledge to: understand the nature and impact of adult abuse; understand the nature, factors, and impact of institutional abuse; identify risk factors, such as abuse of power and exploitation; recognise how adults and institutions can be groomed, including how power imbalances can be exploited; and understand what could make specific adults at increased risk of abuse.	√			
	n 7.4 - Personnel have information and skills to	Managed &	Defined &	Initial/	Not
-	d effectively to safeguarding risks, concerns, ures, and allegations of abuse.	Measurable	Developed	Ad-hoc	Addressed
7.41.	Education and training programs equip relevant personnel to appropriately respond to and support anyone brining forward concerns, disclosures, and allegations of abuse.	√			
7.4.2	Personnel receive training on information sharing and record keeping policies and procedures.	✓			
7.4.3	Personnel receive training on information obligations under Commonwealth. State/Territory legislative and canon law, which includes: • reporting suspected criminal behaviour to police; • mandatory reporting to child protection authorities; • Reportable Conduct Scheme; • reporting to other regulatory authorities or government departments; and • Canonical reporting requirements.	✓			
	sonnel receive training and information on how to ulturally safe environments for children and adults.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
7.5.1	Cultural safety training is provided to equip personnel to create, culturally safe environments for Aboriginal and Torres Strait Islander people.	√	Developed	Au-110C	Addressed
7.5.2	Training is provided to relevant personnel to equip them with the knowledge and understanding of diverse cultural backgrounds and how to create safe environments for people from these groups.	√			

Standa	rd 8	Safe physical and online env	ironments			
	Physical and online environments promote safety and contain appropriate safeguards to minimise the opportunity for children and adults to be harmed					
both ph	ne Safeguarding Risk Mana nysical and online risks, w ual's right to privacy or we		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
8.1.1	the provision of ministry the risks arising from: one-to-one into and a child; ministries and/counselling, ho one tuition, the reconciliation, mentoring; potential physic penitent and the sacrament of reconciliation in adult-to-child in adult-to-child in adult-to-adult in considerations the nature of periods.	nteractions; nteractions (with of power imbalances); and	✓			
8.1.2	applications for children communicate and seek	and adults to learn, help.	√			
8.1.3	Personnel are involved i physical and online risks	n identifying and mitigating to children and adults.	✓			
Observa Require		n place. No recommendations for	improvement i	noted.		
	Criterion 8.2 - The online environment is used in accordance with the entity's Code of Conduct and Safeguarding Policy.		Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
8.2.1		online environments in line with ct, Privacy Act and relevant	√			
8.2.2	managed in accordance wi	monitored, and breaches are the disciplinary procedures or reported to the leadership.	√			
Observa Require		n place. No recommendations for	improvement i	noted.		

setting	on 8.3 - Risk management plans address the range of s, activities and physical environments in which y and/or services occur.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
8.3.1	A process is in place to assess and manage risk if the organisation becomes aware of the presence of someone who poses an unacceptable risk to others within their ministry and/or service.	✓			

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

and fro	on 8.4 - Where facilities and services are contracted to m third parties, contractual arrangements specify arding considerations.	Managed & Measurable	Defined & Developed	Initial/ Ad-hoc	Not Addressed
8.4.1	If a third party provides services or uses the organisation's facilities appropriate safeguarding policies are practices are in place.		✓		

Observations:

Requirements of the indicators are in place.

8.4.1 ACSL recommends that the SSJG standard 'Hire Agreement Form' is uploaded to the SSJG website under the 'Safeguarding tab' and the individual page of the Heritage Centre. See <u>recommendation #5</u>.

3. Detailed Findings

Standard 1: Committed leadership, governance and culture

The safety of children and adults safeguarding is embedded in the entity's leadership, governance and culture

Recommendation #1			
Criterion 1.1 - There approach to abuse.	Priority 2		
Details of finding	ACSL notes that SSJG have a public statement and takes a zero tolerance to information is not clearly found on the SSJG website. ACSL recommends the their website and include a specific page/tab for safeguarding and upload documentation here. This will make their information more accessible to expect the second seco	at SSJG reorganise safeguarding	
Recommendation	ACSL recommends that the Safeguarding Statement and other relevant documentation is listed under a separate 'tab' on the front page of the SSJG website.		
Agreed Action	SSJG will develop a separate 'Safeguarding Tab' on their website and upload documentation to this section. The 'Safeguarding Tab' will be visible on the SSJG website.		
Responsibility	Regional General Manager		
Due date	30 September 2023		

Recommendation #2			
Criterion 1.3 - Govern	Priority 2		
Details of finding	ACSL note there are clear governance and accountable governance arrange the SSJG. There are long serving members who have a depth of knowledge with the SSJG.	<u>-</u>	
Recommendation	ACSL recommends that a Management Committee Charter is developed and new Committee members are provided with an induction on this Charter n which includes a focus on safeguarding.		
Agreed Action	A Management Committee Charter will be developed and used for a variety including introduction any new Committee to the SSJG.	y of purposes	
Responsibility	Responsibility Regional General Manager		
Due date	March 2024		

Standard 6: Effective complaints management

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

Recommendation #3			
Criterion 6.1 - The er approaches to dealin keeping requirement	Priority 2		
Details of finding	ACSL notes the entity has an effective Complaints Handling Policy and Procedure which outlines roles and responsibilities, approaches to dealing with different types of complaints, reporting obligations and record keeping requirements. The people who use SSJG facilities might benefit from a publicly displayed simple 'flow-chart' that explains this process.		
Recommendation	ACSL recommends that a complaint process materials posters 'flow-chart' is developed and displayed in the ministries.		
Agreed Action	Agreed Action A complaint flow chart will be developed and displayed in ministries.		
Responsibility			
Due date			

Recommendation #4			
Criterion 6.3 - Compl	Priority 2		
Details of finding	SSJG have not received any complaints and interviews with personnel indicomplaint will be treated seriously. If SSJG were to receive a complaint, for Assessment' proforma will provide objectivity to identifying risks and strat appropriately respond to the complaint. Given that SSJG has not received personnel may find it difficult to know how to respond to a complaint as it activity. ACSL recommends that a series of 'flash cards' are developed and personnel to remind them of their obligations and SSJG processes.	llowing a 'Risk egies that can complaints, not a usual	
Recommendation	ACSL recommends SSJG develop a 'Risk Assessment' pro forma to formally identify and recommendation ACSL recommends SSJG develop a 'Risk Assessment' pro forma to formally identify and recommendation the level of risk upon receiving a complaint. ACSL recommends that a set of 'flash cards' are developed and easily accessible to personnel in the event the complaint process needs to be implemented.		
Agreed Action	A 'Risk Assessment' proforma to assess any complaints that may be received outlining the complaint process will be introduced	ed and a 'flash card'	
Responsibility	Responsibility Regional General Manager		
Due date	31 December 2023		

Standard 8: Safe physical and online environments

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

Recommendation #5			
Criterion 8.4 - Where contractual arrangen	Priority 2		
Details of finding	SSJG have a 'Hire Agreement' they use for third-party contractors who use their facilities. The Agreement is comprehensive and clearly outlines contractor and SSJG expectations. The form is yet to be uploaded to the Heritage Centre website.		
Recommendation	ACSL recommends that the SSJG standard 'Hire Agreement Form' is uploaded to the SSJG website under the 'Safeguarding tab' and the individual page of the Heritage Centre website.		
Agreed Action	Agreed Action The 'Hire Agreement Form' for the Heritage Centre will be revised and proportionate to the clients who use the Centre and uploaded to the website.		
Responsibility	Responsibility Regional General Manager		
Due date	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

Gaps or control weaknesses have been identified resulting in non-compliance with 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.

Priority 2

Progress has been made with respect to implementation of the required indicator, however full compliance is yet to be achieved.

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.

Priority 3

Issues have been identified which represent minor procedural weaknesses or improvement opportunities with respect to the operation of the indicator.

Expected resolution is within 12 months or earlier from the issuance of this report.

Appendix C

GLOSSARY

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

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

Abuse	when used throughout the NCSS document this is an inclusive term covering both child and adult abuse
Abuse of Power	means the abuse of position, function or duty to take advantage of another. This can take many forms and include situations where a person has power over another person by virtue of their relationship (e.g. employer and employee, teacher and student, coach and athlete, parent or guardian and child, clergy/religious and parishioner) and uses that power to their advantage.
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.
Adult	means any person 18 years or older. When used throughout the NCSS document this is an inclusive term referring to all adults, including adults at risk.
Adult abuse	means the improper treatment of a person that results in the actual and/or likelihood of causing physical or emotional harm. Abuse can come in many forms, such as: physical or verbal maltreatment, neglect, injury, assault, violation, rape, unjust practices, crimes, exploitation, or other types of aggression. There are several categories of abuse of adults, such as: Sexual abuse* Physical abuse* Emotional/psychological abuse* Neglect* Elder abuse* Financial abuse* Exploitation* Within the context of the Catholic church and faith-based entities, it is also important to recognise spiritual abuse* as an additional subtype of abuse.
Adult at risk	means any person aged 18 years and over who is at increased risk of experiencing abuse, such as people:

	 who are elderly with a disability who suffer from mental illness who have diminished capacity who have cognitive impairment who have suffered previous abuse who are experiencing transient risks
	 who in receiving a ministry or service are subject to a power imbalance who identify as Aboriginal and Torres Strait Islander who are from a culturally and linguistically diverse background who are of diverse sexuality who have any other impairment or adversity that makes it difficult for them to protect themselves from abuse.
Allegation	means a complaint, still to be verified, claiming, or asserting that someone has committed an act of abuse against a child or adult. The term is used interchangeably and in combination with "complaint".
Audit	means a mechanism to assess how a Church Authority, ministry or entity governed by a Church Authority, is implementing the National Catholic Safeguarding Standards.
Australian Catholic	means the assembly of Bishops of Australia exercising together certain pastoral
Bishops Conference	offices for the Catholics of Australia.
Bishop	means a diocesan bishop or archbishop, the ordinary of an Ordinariate and the prelate of a Personal Prelature of the Latin Church and an eparch of 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 legislation promulgated by the competent ecclesiastical authority.
Canonical Offence	means canonical crimes: of sexual abuse committed by clerics and religious are:
	 forcing someone, by violence or threat or through abuse of authority, to perform or submit to sexual acts; performing sexual acts with a minor or a vulnerable person; the production, exhibition, possession or distribution, including by electronic means, of child pornography, as well as by the recruitment of or inducement of a minor or a vulnerable person to participate in pornographic exhibitions. The canonical crimes/delicts/offences committed by clerics or religious as stated in Art. 1 §1 a) of Vos Estis Lux Mundi. Definition of vulnerable person as stated in Art. 1 §2 b) of Vos Estis Lux Mundi: "means: any person in a state of infirmity, physical or mental deficiency, or
	deprivation of personal liberty which, in fact, even occasionally, limits their ability to understand or to want or otherwise resist the offence". This definition is captured by the term 'Adult at risk' within the NCSS.
Catholic Religious	CRA is the conference of major superiors comprising leaders of religious institutes
Australia Certification	and societies of apostolic life within the Catholic Church in Australia. means the act of giving official authority or approval and certification of the implementation of the NCSS and permission to use the ACSL Certification symbol.
Child/ren	means individuals under 18 years of age.
Child abuse	There are different legal definitions of child abuse in Australia. Definition sourced from the Australian Institute of Family Studies:

	https://aifs.gov.au/cfca/publications/reporting-abuse-and-neglect
	Child abuse refers to any behaviour or treatment by parents, caregivers, other adults or older adolescents that results in the actual and/or likelihood of causing physical or emotional harm to a child. Such behaviours may be intentional or unintentional and can include acts of omission (i.e., neglect) and commission. Child abuse and neglect is commonly divided into five subtypes:
	 physical abuse emotional/psychological abuse neglect sexual abuse exposure to family violence
Church Authority	means:
	 a diocesan bishop or archbishop, an ordinary of an Ordinariate and the prelate of a Personal Prelature of the Latin Church and an eparch of an eparchy of an Eastern Church. the competent authority, howsoever titled, exercising the ministry of governance for religious institutes in Australia in accordance with their Constitutions; or for ministerial PJPS the competent authority in accordance with the statutes.
	 for any other Church entity, the senior authority within the organization in accordance with its rules.
Church Protocols	means official procedures or system of rules which govern the affairs of the Catholic Church in Australia, for example, Vos Estis Lux Mundi and the National Response Protocol.
Civil Standard	the most common standard of proof relates to civil proceedings, which is the balance of probabilities (incorporating the principles from Briginshaw v Briginshaw) – which means it is more probable than not that what the person says happened is true (in criminal cases, the standard is proof beyond reasonable doubt).
Clergy	includes bishops, priests and deacons.
Clergy and religious from countries other than Australia	means any cleric or member of a religious institute who is specifically recruited or welcomed from overseas by a Church Authority or entity.
Cleric	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 that it occurs when "clerics feel they are superior, [and when] they are far from the people." It can be "fostered by priests themselves or by lay persons".
Cognitive impairment	means when a person has trouble remembering, learning new things, concentrating, or making decisions that affect their everyday life, because of their condition. Some causes of long-term or permanent cognitive impairment include dementia, stroke, or brain injury. For further information see: https://www.healthdirect.gov.au/cognitive-impairment
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. A

complaint may also include disclosures made to an institution that may be about, or relate to, abuse in the entity's context. Conflicts of interest means situations (perceived or actual) where a conflict arises between a per official duties and their private interests, which could influence the perform those official duties. Such conflict generally involves opposing principles or incompatible wishes or needs and may occur when personnel function in moroles. Consecrated Life/Institute of Consecrated Life is an association of faithful in the Catholic Church erected by canon law who members profess the evangelical counsels of chastity, poverty, and obedier vows or other sacred bonds (as defined in the Code of Canon Law under care 573–730). Apart from being a member of an institute, consecrated life may also be livered individually; the Catholic Church recognises, as forms of individual consecrated virgins. 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, or they are and what they need. It is about shared respect, shared meaning, showledge, and experience, of learning, living and working together with displacements.	rson's nance of nultiple ose nce by nons ed ted life
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they are and what they need. It is about shared respect, shared meaning, sh	f who
and truly listening.	
Dicastery means a department of the Roman Curia.	
Dignity or Right to refers to enabling individuals the right (or dignity) to take reasonable risks.	lt
Risk recognises that restricting this right can stifle the individual's growth, self-e	steem
and the overall quality of life:	
'Given that an individual's personal dignity is manifested, in part, by	their
ability to remain autonomous, and being autonomous engenders ri	sk-
taking. Inhibiting an individual's ability to take risks erodes their dig	nity.
Dignity of risk is therefore the principle of allowing an individual the	
afforded by risk-taking, subsequently enhancing their personal grov	vth and
quality of life.'	_
(Joseph E Ibrahim and Marie-Claire Davis, 'Impediments to Applying the "Di	-
Risk" Principle in Residential Aged Care Services: "Dignity of Risk" in Residen	
Aged Care', Australasian Journal on Ageing 32, no. 3 (September 2013): 188	
Diminished capacity means if an adult needs to make a decision and is unable to carry out any p	
this process (as listed below), they have impaired decision-making capacity.	
There are three elements to making a decision:	
 understanding the nature and effect of the decision; 	
freely and voluntarily deciding; and	
 communicating the decision in some way. 	
Diocese means a diocese, archdiocese, ordinariate or personal prelature of the Latir	 1
Church and an eparchy of an Eastern Church.	
Disability (persons means those who have physical, mental, intellectual, or sensory impairmen	ts
with) which in interaction with various barriers may hinder their full and effective	
participation in society on an equal basis with others. (Article 2, United Nati	
Convention on the Rights of Persons with Disabilities.)	
Diversity means a range of people who have various racial, ethnic, socioeconomic, ar	nd
cultural backgrounds and various lifestyles, experience, and interests.	
Diverse sexuality refers to all the diversities of sex characteristics, sexual orientations, and ge	nder
identities, without the need to specify each of the identities, behaviours, or	
characteristics that form this plurality.	

Elder abuse	means a single or repeated act or lack of appropriate action, occurring within any relationship where there is an expectation of trust which causes harm or distress to an older person.
Emotional abuse (adults)	is a common form of abuse that occurs in close relationships. Emotional abuse is defined as abuse that occurs when a person is subjected to behaviours or actions aimed at preventing or controlling their behaviour, with the intent to cause them emotional harm or fear, through manipulation, isolation, or intimidation.
Emotional abuse (children)	Emotional abuse of children refers to a parent or caregiver's inappropriate verbal or symbolic acts towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability. Such acts of commission or omission are likely to damage a child's self-esteem or social competence.
Entity	means a diocese, religious institute, ministerial PJP (including their agencies) or association recognised as Catholic in accord with canon law.
Exploitation	is the deliberate maltreatment, manipulation or abuse of power and control over another person. It is taking advantage of another person or situation usually, but not always, for personal gain.
Exposure to family	is generally considered to be a form of psychologically abusive behaviour, where a
violence	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.
Financial abuse	involves the illegal or improper use or mismanagement of a person's money, property or resources. Stealing, fraud, forgery, embezzlement, forced changes to a will, inappropriate removal of a resident's decision-making powers and misuse of power of attorney are all forms of financial abuse or exploitation.
Formation/program	means a program preparing individuals for ordination or profession of vows and a life-long journey to the invitation of Christ to proclaim and live the Gospel message, within the life of the Church.
Good Standing	A person in good standing is regarded as having complied with all their safeguarding obligations, and is not subject to any form of allegation, disciplinary process, sanction suspension.
Grooming (child)	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.
Grooming (adult)	is the predatory act of manoeuvring another individual into a position that makes them more isolated, dependent, likely to trust, and more vulnerable to abusive behaviour.
Guardian	refers to the person(s) who has the legal authority to care for the personal and property interests of another person.
Institutional abuse	means abuse or poor care within an institution or specific care setting. Possible causes of institutional abuse include:

	a "closed" culture within an organisation where transparency is
	discouraged.
	 lack of flexibility and choice for people using the service.
	 failure to properly check the backgrounds and interview staff.
	inadequate training.
	lack of safeguarding policies and procedures.
	lack of support of staff by management.
	poor supervision; and
	 poor standards of care.
. //	·
Lay/lay person	means members of the Catholic Church and Church personnel 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.
Mentor	means an experienced and trusted advisor or a person who gives a younger or less
	experienced person help and advice over a period.
Ministerial PJP	means a legal entity which is constituted a public juridic person in canon law and
	carries on its mission in the name of the Church, in accordance with its statutes
	approved by the competent ecclesiastical authority.
Ministry	means any activity within, or conducted by, an entity, that is authorised by formal
	appointment and designed to carry out the apostolic and charitable works of the
	Catholic Church.
NDIS Worker	The NDIS Worker Screening Check is an assessment of whether a person who
Screening Check	works, or seeks to work, with people with disability poses a risk to them. The
	assessment determines whether a person is cleared or excluded from working in
	certain roles with people with disability.
	For further information see https://www.ndiscommission.gov.au/about/ndis-
	worker-screening-check
Neglect (adult)	is the failure of a carer to provide the necessities of life to a person for whom they
	are caring.
Neglect (child)	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.
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.
Organisation	means a ministry and/or service operating under the governance of a recognised
	authority (such as a legal entity) and/or a Church Authority.
Pastoral care	means when one person has responsibility for the wellbeing of another or for a
	faith community. It includes the provision of spiritual advice and support,
	education, counselling, medical care, and assistance in times of need. All work
	involving the supervision or education of children and young people is a work of
	pastoral care.
Personnel (Church	means a cleric, religious or other person who is employed by the entity or engaged
personnel)	on a contract, subcontract, voluntary or unpaid basis.
Physical abuse	is a non-accidental physically aggressive act which results in physical pain or injury,
	and which may include physical coercion and physical restraint. Physical abuse may
	be intentional or may be the inadvertent result of physical punishment.
Professional/pastoral	means a professional activity in which personnel are engaged in reflection and
supervision	learning, under the guidance of a supervisor. Supervision assists personnel in their

	accountabilities for professional standards, defined competencies for their role and
	understanding and implementation of organisational policy and procedures. For
	clerics and religious, professional supervision assists in the maintenance of
	boundaries of the pastoral relationship and enhances the quality of their
	ministry.
Protective behaviours	Is a type of abuse prevention program and means an age-appropriate structured
program	education program to equip children and young people with the skills and
	knowledge to enhance their personal safety.
Reflective practice	is a professional development technique that involves thoughtfully considering
	one's own experiences in applying knowledge to practice. It is expected to be a
	continuous process, whereby an individual explores an experience to identify what
	happened and what their role in this experience was, including behaviour, thinking,
	and related emotions. Reflective practice enables potential changes in approaches
	to similar future events to be identified, with the aim of improved performance.
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.
Religious	means a member of an institute of consecrated life or a society of apostolic life.
Respondent	means a person against whom a complaint is made.
Review	means an internal self-assessment of an entity's implementation of the National
	Catholic Safeguarding Standards. A review can also be an assessment that forms
	part of the process of continuous improvement which occurs when following up
	recommendations made during an audit.
Risk-based audit and	means a framework for assessing the implementation of the National Catholic
Review Framework	Safeguarding Standards that reflects a proportionate response based on the risk
	profile of the Church Authority.
Risk Profile	means an assessment against key safeguarding risk factors.
Safeguarding	means a committee established to advise and support the Church Authority on all
Committee	matters relating to safeguarding, including the development and implementation
	of a Safeguarding Implementation Plan and coordinating annual self-audits at a
	local level. Committee members need relevant and varied professional expertise in
	relation to safeguarding, child protection, organisational culture and structure,
	policy development, etc. and include lay women and men.
Safeguarding Culture	means embedding safeguarding into everything an organisation does. In promoting
	this culture, young people and adults at risk will understand they will be listened
	to, supported, and known action will be taken on their behalf.
Safeguarding	means a Commitment Statement describing an entity's commitment to keep
Commitment	children and adults safe from harm. It informs the entity's safeguarding culture.
Statement	
Safeguarding Co-	means an individual who champions safeguarding and co-ordinates the
ordinator	implementation of the National Catholic Safeguarding Standards within an entity.
Safeguarding	means a documented plan which articulates actions to be taken across the entity
Implementation Plan	to ensure safeguarding practices are in place. It includes actions, strategies,
	responsibilities, delegations, and accountabilities, and tracks review and progress.
	It is overseen by the Safeguarding Committee.
Safeguarding policies	means any policies or procedures of the entity that address elements of
and procedures	safeguarding children and adults. For example, but not limited to:

	has its own system. They are one part of a Church entity's recruitment, selection,
	and screening practices.
Working with	means the Working with Vulnerable People (Background Checking) Act 2011 in the
Vulnerable People	Australian Capital Territory which requires those working with children (and other
Check	vulnerable groups) to complete a Working with Vulnerable People Check and be
	registered before they can commence employment.
	Tasmania has a 'Working with Vulnerable People Check' which requires all
	employees and volunteers aged 16 and over working in childcare services or other
	child-related services to apply for a WWVP check.
	To date, only the ACT and Tasmania have this requirement.